



## **Norfolk's Police and Crime Commissioner's (PCC) response to inspections published by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)**

Section 55 of the Police Act 1996 (as amended by section 37 of the Policing and Crime Act 2017) requires local policing bodies to respond and publish comments on all inspection reports pertaining to your force within 56 days of report publication.

### **Inspection Title:**

An inspection of the effectiveness of the police and law enforcement bodies' response to group-based child sexual exploitation in England and Wales

### **Published on:**

8 December 2023

### **Publication Types:**

Child Protection and National Thematic

### **Police Forces:**

All local forces in England and Wales

### **Link to Report:**

[An inspection of the effectiveness of the police and law enforcement bodies' response to group-based child sexual exploitation in England and Wales \(justiceinspectorates.gov.uk\)](https://justiceinspectorates.gov.uk)

### **Section 55 Response Deadline:**

2 February 2024

### **Key Findings**

On 21 March 2022, the then Home Secretary, wrote to HMICFRS, requesting an inspection under section 54 (2B) of the Police Act 1996. The terms of reference asked HMICFRS to inspect the police and other law enforcement bodies in England and Wales and consider how effectively they respond to victims and perpetrators of group-based child sexual exploitation (CSE). HMICFRS were also asked to assess how their responses influence investigations and the ways in which they safeguard children.

During the inspection, HMICFRS focused on three broad areas:

- The nature and scale of offending
- The police's attitude towards victims

- The quality of investigations and wider outcomes

Within their inspection, HMICFRS found that the police service has taken steps to improve its response to CSE over the years. Police forces know more about the wider context in which cases of child abuse occur. Many forces now undertake Strategic Assessments of specific child protection issues, such as child sexual abuse, grooming and indecent images of children. These assessments help senior leaders to understand the nature and scale of these issues in order to inform the development of force priorities. However, HMICFRS commented that progress remains slow, and an accurate view of group based CSE was not available to the police service as data collection is unreliable and intelligence gathering is not prioritised.

HMICFRS found that forces were using different definitions to tackle group based CSE. Having multiple definitions creates problems for the police service and the Home Office when attempting to understand the true nature and scale of group based CSE. HMICFRS suggest that a shared definition would provide forces with greater clarity about their performance in tackling group based CSE.

During HMICFRS' inspection, group based CSE became part of the wider responsibilities of the child protection and abuse investigation portfolio. This avoids duplication, co-ordinates most child protection matters and provides national leadership for the policing response. HMICFRS regard the change as an important and positive development.

HMICFRS visited six forces and two regional organised crime units as part of their inspection. HMICFRS found inconsistencies in how they analysed and developed intelligence on group based CSE. Some forces held intelligence on local rather than central intelligence systems. This meant they didn't have a force-wide understanding of the problem. Furthermore, none of the six forces or two regional organised crime units inspected had produced a problem profile specifically for group based CSE. Before HMICFRS' inspection, the inspectorate asked each of the 43 forces in England and Wales whether they had a problem profile on CSE; only 24 said that they did and of those, only half updated it yearly.

The inspection found that forces struggled to identify group based CSE investigations among their wider CSE investigations when HMICFRS requested them. HMICFRS found that when specialist officers took charge of investigations, they were of a better quality. Specialist investigators were more likely to identify and pursue lines of enquiry promptly and to address any safeguarding concerns. This is because they have the right training and skills to investigate group based CSE offences. In some of the other investigations reviewed, HMICFRS found that non-specialist investigating officers lacked the experience and training to progress investigations promptly and effectively.

HMICFRS found that most officers understood that children were being sexually exploited and made efforts to avoid criminalising them. In the cases reviewed, HMICFRS didn't see any examples of officers making efforts to prosecute children when there was evidence of coercion and exploitation, nor did they find examples of victim-blaming language in three of the six forces inspected. The use of victim-blaming language indicates that some police personnel did not understand the vulnerability of children.

During the inspection, HMICFRS found that most forces' use of disruption was limited and didn't always involve partner agencies. The forces the inspectorate visited made limited use of campaigns to raise awareness of group based CSE. The campaigns HMICFRS saw were usually limited to one part of the force area and in some cases, were one-off local interventions.

## **Recommendations**

Nine recommendations were made by HMICFRS within their report, four of which were directed at Chief Constables. These are detailed below using the same numbering from the report itself:

### **Recommendation 2:**

By 31 December 2024, all Chief Constables should make sure that their forces have problem profiles for child sexual exploitation, each of which should include an assessment of the nature and extent of group-based child sexual exploitation. This should include relevant data from local partner agencies and should be updated frequently, at least annually.

### **Recommendation 4:**

By 31 December 2024, all Chief Constables and the relevant business user groups for police record management systems should make sure there are sufficient measures in place to identify group-based child sexual exploitation.

### **Recommendation 8:**

By 30 June 2024, all Chief Constables of forces that are yet to receive the Hydrant Programme's continuing professional development offer should arrange it.

### **Recommendation 9:**

With immediate effect, all Chief Constables should take effective steps to eradicate victim-blaming language in their forces.

## **Areas for Improvement**

One area for improvement was put forward by HMICFRS within their report, which is detailed below:

### **Area for improvement:**

All Chief Constables should work with their statutory safeguarding partners to review, promote and make sure that relevant group-based child sexual exploitation disruption and prevention initiatives are implemented effectively in their forces.

This should include consideration of options such as the advice given in the Home Office disruption toolkit and an Operation Makesafe (a national police initiative to raise awareness of child sexual exploitation in the business community) type of approach.

## Chief Constable response to report and any Recommendations/Areas for Improvement

This report entitled “*An inspection of the effectiveness of the police and law enforcement bodies’ response to group-based child sexual exploitation in England and Wales*” was a thematic inspection conducted by His Majesty’s Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS).

Norfolk Constabulary was one of the six police forces inspected in November 2022.

The report has resulted in nine recommendations, four of which were directed to all police forces and Chief Constables across England and Wales. The report also resulted in one Area for Improvement (AFI) for all forces.

Norfolk Constabulary accepts all these recommendations and the Area for Improvement.

We have reviewed our current position against each recommendation and the AFI and have developed a plan which will help us to achieve the standards outlined by HMICFRS.

### **Recommendation 2:**

**By 31 December 2024, all Chief Constables should make sure that their forces have problem profiles for child sexual exploitation, each of which should include an assessment of the nature and extent of group-based child sexual exploitation. This should include relevant data from local partner agencies and should be updated frequently, at least annually.**

The Home Office has recently published a Terms of Reference and methodology for completing Child Sexual Exploitation (CSE) problem profiles to ensure consistency across forces. We also expect to receive more direction about what should be included in the profile in the first or second quarter of 2024. We will have a Norfolk Child Sexual Exploitation problem profile by December 2024 which will be developed in consultation with local partner agencies and will be refreshed annually. The inclusion of an assessment of the nature and extent of group-based child sexual exploitation will require an element of professional judgement because there is no recording mechanism on our Crime and Intelligence system (Athena) to flag CSE offences which are group-based.

Recommendation 4 of this report requires police forces to ensure there are sufficient measures in place to identify group-based CSE. As this develops, we will be better placed to include group-based CSE information within our problem profile, but it will take time for trend analysis to be included within our profile due to the lack of available historical data on Athena.

### **Recommendation 4:**

**By 31 December 2024, all Chief Constables and the relevant business user groups for police record management systems should make sure there are sufficient measures in place to identify group-based child sexual exploitation.**

As explained above, we do not currently have a mechanism built into Athena to flag when a victim or offender is suspected of being involved in a group-based Child Sexual Exploitation

offence. This has been raised at the nine-force Athena Data Analysis User Group but there are currently no plans to create a flag. All police forces that use Athena are in the same position and the Home Office is aware of this recording and reporting issue.

In the absence of an automated Athena flag the Constabulary Multi-Agency Child Exploitation (MACE) team follows a daily scanning process to identifying CSE offences, including those that are group-based. This involves running automated searches which have been created on Athena for children who have been identified as being at risk of sexual exploitation.

In addition, when a new CSE case is allocated to the MACE team a number of initial safeguarding actions are undertaken. Two additional actions have recently been included within the team's checklist to support the identification of group-based CSE. The first is an action which prompts the case manager to consider whether group-based child sexual exploitation may be occurring. The second is an action which reminds the case manager to ensure that the Voice of the Child is being heard and that their opinions are recorded and reviewed.

A process has also been implemented between the MACE team and our Force Intelligence Bureau (FIB) which ensure that when intelligence reports are processed, any that have a CSE element are referred by FIB to the MACE team for review.

The MACE team also work with a range of partner agencies across the county. The close working relationships that have been established helps to ensure that any information relating to concerns about group-based CSE will be shared with the Constabulary.

To deliver this recommendation by December 2024 we will continue to further develop our processes for identifying group-based CSE, but this will be harder to achieve without an Athena flag.

#### **Recommendation 8:**

**By 30 June 2024, all Chief Constables of forces that are yet to receive the Hydrant Programme's continuing professional development offer should arrange it.**

We utilised the Hydrant Continuing Professional Development (CPD) programme in May 2022 for relevant Senior Investigators. This recommendation does not therefore apply to Norfolk. Nonetheless, our senior lead for Rape and Serious Sexual Offences (RaSSO) is in contact with the Deputy Director of the Hydrant Programme and National Child Sexual Exploitation Task Force to arrange further CPD opportunities relating to Child Sexual Exploitation.

In addition, we have developed the following CSE-linked training opportunities for officers and staff in relevant roles:

- We are training all RaSSO Detectives in the new College of Policing Rape Investigation Skills Development Programme (RISDP). The principles of this apply to CSE investigations.

- We have CPD days built into our Investigators shift pattern. The latest round of training includes an input from a Special Educational Needs school teacher, which is supporting our approach to trauma informed practice.
- Bespoke Child Exploitation CPD events are run for the Multi-Agency Child Exploitation (MACE) team.

### **Recommendation 9:**

**With immediate effect, all Chief Constables should take effective steps to eradicate victim-blaming language in their forces.**

Over the last 12 months we have been addressing victim-blaming language after an audit revealed occasional but unacceptable use of it, especially in missing person cases. This has been delivered through three workstreams:

- 1) Training was delivered to all Inspectors and Sergeants in Spring and Summer of 2023 which introduced new guidance on recognising and recording the Voice of the Child. The training explained the importance of using appropriate language so as not to bias safeguarding efforts through reinforcing negative stereotypes.
- 2) Training to all frontline officers via shift training days to reinforce the impact of both positive and negative language and engage officers in discussions about outdated preconceptions that underly victim-blaming language. This is an ongoing programme.
- 3) A force-wide communications strategy introducing a mnemonic to help officers organise and format their recording of the Voice of the Child, which further reinforces the need for sensitive and empathetic language.

The results are being tracked via the force Child Protection Standards Working Group using an audit mechanism.

### **Area for improvement:**

**All Chief Constables should work with their statutory safeguarding partners to review, promote, and make sure that relevant group-based child sexual exploitation disruption and prevention initiatives are implemented effectively in their forces. This should include consideration of options such as the advice given in the Home Office disruption toolkit and an Operation Makesafe (a national police initiative to raise awareness of child sexual exploitation in the business community) type of approach.**

Under the Vulnerable Adolescent Delivery plan, the Vulnerable Adolescent Group (VAG) continues to review and promote awareness and disruption of group-based CSE. The delivery plan is structured under four Pillars of work in this area, including Awareness Raising, Early Help and Identification, Safeguarding exploited young people, and Disruption. Statutory safeguarding partners provide updates on their work to progress and support these four Pillars. Norfolk Constabulary Community Safety Department are planning an Operation Makesafe initiative in early 2024.

## **PCC response to report and any Recommendations/Areas for Improvement**

Norfolk Constabulary was one of six forces visited by HMICFRS as part of fieldwork to deliver this report into the effectiveness of police and law enforcement bodies' response to group based child sexual exploitation. I note and endorse my Chief Constable's comments on the four recommendations and one area for improvement relevant to Norfolk.

However, I am concerned, at Recommendation 4, that we do not currently have a mechanism built into the Athena system to flag when a victim or offender is suspected of being involved in a group-based child sexual exploitation, and that there are no plans to create a flag. I note that Norfolk would continue to rely on daily scanning by the Multi-Agency Child Exploitation (MACE) team. While this may be a pragmatic, hopefully short-term, solution, I worry that this places additional pressure on the MACE team while increasing the scope for system or human error. I would suggest that we need greater responsiveness from the providers of Athena, and I will be taking this up with the PCGs in the nine-force area and the Athena Management Board.

As ever, I wish to note that, however welcome and important this report's recommendations may be, they create additional unfunded tasks at a time when I am having to ask my Chief Constable to find yet more efficiencies from his already too lean force. This report is just one issued by HMICFRS during FY23-24 and the volume of legislation, policy guidance, and inspection reports creates an ever-increasing list of unfunded additional tasks that inevitably result in competition for finite resources. This in turn creates pressure to accept operational risks, and in turn again creates an increasingly unfair challenge for our Chief Constables. It is imperative that future police funding settlements take account of the need to resource such recommendations to prevent the creation of conditions requiring the 'robbing of Peter to pay Paul'.

### **For Office Use Only:**

- Response submitted to the HMICFRS Monitoring Portal.
- Response forwarded to the Chief Constable.
- Response forwarded to the Norfolk Police and Crime Panel.
- Response published on the OPCCN website.