

Rt Hon Priti Patel MP
Home Secretary
2 Marsham Street
London
SW1P 4DF

15th February 2022

Dear Home Secretary

Response to HMICFRS Report: ‘National Child Protection Inspection (NCP) Programme - Cambridgeshire Constabulary 5–16 July 2021’.

Under Section 55(5) of the Police Act 1996, as Police and Crime Commissioner I am pleased to provide my formal response to the report by HMICFRS entitled ‘National Child Protection Inspection (NCP) Programme - Cambridgeshire Constabulary 5–16 July 2021’.

Both the Chief Constable and I welcome the publication of the report.

Through my office I am ensuring the Constabulary and partner agencies are able to access additional resources, where appropriate, to enhance their responses in this area of work. This has included:

- 1) Funding for **Young Person Early Intervention Officers** to work with young people following their very first missing from home episode. These posts, based in the Constabulary, aim to enhance safeguarding, reduce vulnerability and exploitation, reduce the likelihood of missing episodes and to develop intelligence or disclosures in order to tackle the perpetrators of exploitation.
- 2) Support for the Youth Offending Service to develop a new model (**called SAFE**) of engaging with young people at risk of exploitation (either as a victim or offender). This has included a contribution to ongoing funding while the service looks at sustainable future delivery models.
- 3) Working in **partnership with a local Academy Trust** to explore how local young people can be provided with safe spaces and meaningful activity out of school hours but within the school estate.

I have also launched a **Youth Fund** to ensure local charities are able to access small pots of money to provide activities for young people.

Finally, I have ensured the **voices of young people** informs our commissioning approaches. A recent tender was shaped by the views of 175 young people.

A report from the Chief Constable in respect of Cambridgeshire Constabulary’s response to the recommendations made by HMICFRS is attached at Appendix 1.

I hope this response, and that of the Chief Constable, provides reassurance regarding the commitment of both myself and Cambridgeshire Constabulary in providing an effective service in relation to child protection.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Darryl Preston', written over a light grey rectangular background.

Darryl Preston
Police and Crime Commissioner for Cambridgeshire and Peterborough

cc PCC@hmic.gsi.gov.uk

Enc - Appendix 1 – Cambridgeshire Constabulary's response to HMICFRS report 'National Child Protection Inspection (NCP) Programme - Cambridgeshire Constabulary 5–16 July 2021'.

Cambridgeshire Constabulary's response to HMICFRS report 'National Child Protection Inspection (NCP) Programme - Cambridgeshire Constabulary 5–16 July 2021'.

HMICFRS have set out eleven recommendations for how Cambridgeshire Constabulary can improve its service when it comes to child protection:

1. Recommendation 1: Within six months, the Constabulary should strengthen its working practices with local authorities to ensure that children charged and refused bail are moved to appropriate alternative accommodation and not held in custody overnight.

Force response: Since this report a monthly meeting has been introduced with partners, attended by the Custody Lead. All young people in custody (YPIC) charged and remanded and not transferred to Local Authority (LA) accommodation for the preceding month are reviewed. Attendees at this meeting include youth offending, social care, emergency duty teams. This multi-agency group highlights any learning or good practice, which is shared across respective organisations.

Additional work being considered:

Policy changes are being considered to introduce an additional level of scrutiny. Currently Custody Officers complete PACE reviews post charge, and there is now consideration of the introduction of an Inspector review process post charge for young people held in custody – above and beyond PACE requirements.

2. Recommendation 2: We recommend that, within six months, Cambridgeshire Constabulary issues guidance to staff in instances where children are taken into police protection. This should include a) advice and what information they should record (and in what form) on their systems to support good-quality decisions; and b) an emphasis on the importance of ensuring that records are made promptly and kept up to date.

Force response: This recommendation features within the Child Sexual abuse and exploitation (CSA/E) response plan and is tracked through the Vulnerability Performance Group (VPG). There has already been messaging within VPG and a review of any children in police protection has been added to the Force Daily Management Meeting (FDMM) to ensure daily oversight around safeguarding, and to encourage and embed a culture of consideration and accurate recording. This has also been added to the

Vulnerability Focus Desks (VFD) area of oversight for intrusive supervision and support. Command Cells have also been directly engaged with to ensure correct recording and continuity.

3. Recommendation 3: We recommend that, within six months, Cambridgeshire Constabulary reviews the monitoring and effectiveness of arrangements for children in police detention with its safeguarding partners.

Force response: Cambridgeshire Constabulary have an agreed YPIC Policy, which was reviewed on 03/02/21 by the Custody Lead and is next due for review on 01/12/2024. This is available for all staff on the Cambridgeshire Policy Library and has been circulated to custody staff.

This policy has clear direction around:

- **Considerations for arrest**
- **Children arrested and not charged**
- **Children who have been charged and refused bail and the process for transfer into LA care as per statutory requirements.**

All other support services (incl. medical and Liaison and Diversion (LADS)) are available as they would be to other detainees in custody and are used.

Through Force Performance Governance a review of young persons in custody is included to allow oversight of trends, increases or reductions in detention to allow early identification should any issues arise. This includes ethnicity and search data for YPIC.

Through a monthly meeting attended by the Custody Lead, all YPIC charged and remanded and not transferred to LA accommodation for the preceding month are reviewed. Attendees at this meeting include youth offending, social care, emergency duty teams. This allow the group to discuss any learning or good practice, which is shared across respective organisations. An example of positive practice arising from the group is a terminology change around the wording 'Secure Bed', which had often led Custody Officers to believe that no LA accommodation (non-secure PACE bed) was available. Feedback from this meeting is shared via the Custody Policy team internally, and any issues arising are addressed directly with staff to educate and embed learning.

YPIC procedures have been shared with district leads to hopefully reduce occasions where young people are brought into custody.

The ACC will be discussing PACE bed provision in general at the next Youth Justice Board (YJB) and has also requested quarterly data from the custody department to support these conversations with partners.

Additional work to complete:

- **Improvement to quality assurance processes to ensure that Custody Officers are challenging partners if accommodation is not available, but also to ensure that Cambridgeshire Officers are recorded rationale when not transferring detained young persons to local accommodation**
- **Quality assurance checks to also include review to ensure that YPIC is being followed**
- **Structured feedback and training via custody continual professional development (CDP) events will be introduced to ensure improvements are realised**

4. Recommendation 4: We recommend that, within six months, Cambridgeshire Constabulary improves its missing persons practices to make sure that its response is consistent with the risks identified in relation to children who are regularly missing, and that the supervision of these enquiries are effective.

Force response: This recommendation is incorporated within the CSA/E response plan. A clear criterion has been devised that will engage both the partnership Vulnerability Action Tracker (VAT) and other objective factors to ensure trigger plans and safeguarding documentation are created in a uniform and consistent way. Improved use and recording of trigger plans are already being messaged and tracked via the new Vulnerability Performance Group and through the bespoke Missing from Home (MFH) and Makesafe inputs in this Force-level governance meeting. Child Abduction Warning Notices (CAWNS) and their appropriate usage and cross referencing will be messaged through the Vulnerability Focus Desks (VFDs), in addition to templated actions being considered for addition to COMPACT records.

5. Recommendation 5: Within six months, the Constabulary should improve its programme of vulnerability training for staff working in custody to improve: a) the recording of information within custody logs to reflect individual circumstances of a child and the investigation of the offence they have committed; b) a rationale for the action they have taken to detain, and continue to detain, a child; and c) how

to capture and record the voices of children by speaking to them and recording their wishes and demeanour.

Force response: Vulnerability Focus Desks (VFDs) will be conducting quality assurance through dip sampling and investigate support on areas. Early Intervention Domestic Abuse Desks (EIDADs) will also provide instruction and guidance. This will be incorporated into Project ARTEMIS with VFDs and EIDADs prompting and supporting officer action / recording at the scene, and promotion through messaging and Dip Sampling. Attitudinal inputs continue through IPLDP / recruit PVP training and CPDU training days. This will be absorbed into Project FLETCHER and within the Supervisors' E-Book and reflected in the wording of the supervisory framework. This will be further supported by the appointment of Custody Directors, and further communications will also be sent out via the VFDs to underline this. 101 forms have been redrafted to ensure greater awareness and uptake of Voice of the Child (VotC) recording by officers at the scene.

The Young Person Early Intervention Officer (YPEIO) role continues, and there has been an uplift of 1 officer in the (Missing/Exploited/Trafficked) MET Hub. Protecting vulnerable people (PVP) teams dip sample 3 different report types (MFH, Crime reports and 101s) to routinely assess how effectively the VoTC is being captured. A separate Task & Finish group, chaired by Police, is further exploring vulnerability through peer-on-peer indecent images of children (IIOC), and improving the police response. Crucially a victim feedback panel is also being devised – scheduled for launch in the first half of 2022 - which will also ensure a wider understanding of our ability to capture VotC.

6. Recommendation 6: We recommend that Cambridgeshire Constabulary immediately reviews its public protection unit (PPU) arrangements and capabilities to ensure that appropriate information about risk from offenders in the community is shared consistently with frontline officers.

Force response: Project BOYD, within Public Protection Unit (PPU), is now fully implemented with a series of improvement measures aggregated from the NCPI feedback. A full programme of transferring and mirroring appropriate data between ViSOR and ATHENA is underway. The increased sharing of information through intelligence briefings (Briefing and Tasking (BAT) slides), increased NPT engagement and input into the Key Offender Dashboard are also strands of Project BOYD.

The current cohort of Registered Sex Offenders (RSOs) on reactive management is being fully reviewed, to ensure appropriate risk assessment and research has been completed.

All nominals staying on reactive management have agreed wording added to their VISOR records and a diarised date for review to minimise any issues with change of risk.

The Reactive Management Policy will include ongoing information sharing with Neighbourhood Officers, Level 1 meetings and briefing slides:

- **Attending Level 1 meetings in North and South weekly**
- **Providing nominals for Key Offender Dashboard**
- **Adding any Very High Risk or active nominals to BAT**
- **RSOs updated weekly on the NHP OneNote for access by NPT supervisors**

Work ongoing includes:

- **Providing a weekly Top 5 North & South Nominals for BAT**
- **Mandatory referral of nominals for the Key offender Dashboards in North & South**

Work is also ongoing on a Beds, Cambs and Herts (BCH) tool to enable all Warranted Officers to access basic details on RSOs in the community. This is a new approved use of Microsoft 365 functionality, that will allow swifter registration and updating of records, whilst simultaneously allowing for the mapping and sharing of information with local Officers. This is expected to go online in the first half of 2022.

7. Recommendation 7: We recommend that, within six months, Cambridgeshire Constabulary reviews its arrangements and practices to ensure that officers responding to domestic abuse incidents implement appropriate risk assessments, so that all children affected are seen and spoken with and their vulnerability is recorded, fully assessed and acted upon.

Force response: Project KAIZEN is the Force-wide Domestic Abuse (DA) response plan led by PVP that will encompass the learning and Areas for Improvement (AFIs) from both the NCPI inspection and the VAWG report. It seeks to enhance the investigative performance of all departments and Officers that progress DA investigations, through a series of tactical and strategic measures. This will build upon the recent addition of EIDA Desks, VFDs, and be supported by the forthcoming Specialist Domestic Abuse Cases (SDAC) mentoring court programme and three new bespoke DA Perpetrator programmes. We are further assessing the effectiveness and appropriateness of our Domestic abuse, Stalking and harassment (DASH) and f101 processes, to ensure that the information submitted within them

captures all risk, and that the administration process allows for efficient, effective and timely information sharing and assessment of risk, to ensure Children and young people are protected and safeguarded.

With support from the Crime Standards Delivery Group (CSDG) we will introduce a suitable solution that enhances the DASH provision of NIDA in respect of children or the f101, to ensure a more consistent approach.

In January 2022, Project KAIZEN will introduce a graduated Force-wide use of tuServ, that will ensure the uniform usage of the DASH forms, and the swifter passage and assimilation of the risk factors described therein. Simultaneously, there will be a re-drafting of our 101 forms to ensure that with DA (Intimate Partner Violence (IPV) and non-IPV) instances of any risk or vulnerability relating to CYPS are better identified. This will be accompanied by suitable communications from our VFDs.

Since Autumn 2022, one of three bespoke DA related perpetrator programmes has been in operation, which specifically addresses Child and Adolescent to Parent Violence (CAPV) and looks at providing diversionary support and interventions for CYPs and their families, supported by a bespoke Independent Domestic Violence Advisor (IDVA) and the RESPECT charity.

8. Recommendation 8: We recommend that Cambridgeshire Constabulary acts immediately to improve its approach to investigations related to the exploitation and abuse of children via the internet, paying particular attention to a) making better use of the intelligence systems available to locate offenders; b) the risk assessment process; and c) sharing information sooner with safeguarding partners.

Force response: Engagement with Social Care - prior to or after warrants - Guidance has been sought from Senior Practice Advisor, National Policing Vulnerability Knowledge and Practice Programme (VKPP), to understand how other forces have responded to this alongside the response from social care in respect of agreed responses based on risk and Multi Agency safeguarding Hub (MASH) processes. Preliminary meeting was held with Police MASH colleagues on 06/10/21 and further meetings are planned with wider MASH partners to take this forward.

All risk assessments will use the KIRAT Risk Assessment Template and will not deviate from this. The whole template must be completed and will be used in all cases involving individuals suspected of possessing, making, taking and/or distributing indecent images of Children (IIOC). It is clear that

other factors may be present, and those dynamics will always be considered.

- **Very High: Immediate/Urgent – arrangements made to take execution action within 24 hours**
- **High Risk cases will be actioned within seven days or as soon as practicable in the case of very high risk**
- **Medium will be actioned with 6 weeks**
- **Low risk should be actioned within 3 months**

9. Recommendation 9: We recommend that, within six months, Cambridgeshire Constabulary reviews its missing persons arrangements and practices to ensure that there is an effective response to vulnerable children throughout any incidents involving missing children.

Force response: Trigger plans now show clear criteria for response, and we have enhanced focus through the Vulnerability assessment Tracker (VAT) tracker and Intelligence & Specialist Crime Department (ISCD) targeting. YPEIO and MET Hub Makesafe processes are also in place to review missing children.

Project ARTEMIS and the MFH Strategy / implementation plan are monitored through Vulnerability Performance Group (VPG).

The combination of renewed criteria for Trigger and Safeguarding plans, renewed Makesafe working practices and new pathway and liaison with TTCG ensures that the MET Hub makes best use of the VAT tracker to identify the key nominals to target and support.

Further reinforcing messaging will be delivered by VFDs regarding return interviews, and the VPG now ensures a monthly assessment of best practice and learning from MFH investigations - as well as an assessment of emerging trends and developments.

A joint working day with the Local Authority SAFE team is taking place on 07/02/22 to ensure regular co-working understanding around MFH and high vulnerability CYPs.

10. Recommendation 10: We recommend that Cambridgeshire Constabulary immediately reviews the application of the diary appointment system used within

the demand hub (control room) in domestic abuse incidents. This is to ensure children are appropriately safeguarded.

Force response: Project KAIZEN will have oversight of the response to this recommendation, and the new Volume Crime Team (VCT) will address this going forward, with further reviews to ensure that the appointments system is robust and ensuring appropriate safeguarding.

The Demand Hub has reviewed its diary appointment system, and appointments for DA are now only offered in appropriate circumstances, after a THRIVE assessment and an immediate, priority or prompt attendance is not deemed suitable.

Appointments will always be in person, save for absolutely exceptional circumstances. This will normally be when there are no other alternatives but to conduct the appointment remotely. This will include occasions where the victim refuses to engage with Police except by phone/video.

11. Recommendation 11: We recommend that, within six months, Cambridgeshire Constabulary acts to make sure that children's concerns and views are consistently obtained and recorded (including noting their behaviour and demeanour).

Force response: Vulnerability Focus Desks (VFDs) will be conducting quality assurance through dip sampling and investigate support on areas. Early Intervention Domestic Abuse Desks (EIDADs) will also provide instruction and guidance. This will be incorporated into Project ARTEMIS with VFDs and EIDADs prompting and supporting officer action / recording at the scene, and promotion through messaging and Dip Sampling. Attitudinal inputs continue through IPLDP / recruit PVP training and CPDU training days. This will be absorbed into Project FLETCHER and within the Supervisors' E-Book and reflected in the wording of the supervisory framework. This will be further supported by the appointment of Custody Directors, and further communications will also be sent out via the VFDs to underline this.

101 forms have been redrafted to ensure greater awareness and uptake of Voice of the Child (VotC) recording by officers at the scene. The Young Person Early Intervention Officer (YPEIO) role continues, and there has been an uplift of 1 officer in the (Missing/Exploited/Trafficked) MET Hub. PVP teams dip sample 3 different report types (MFH, Crime reports and 101s) to routinely assess how effectively the VotC is being captured. A separate Task & Finish group, chaired by Police, is further exploring vulnerability through peer-on-peer indecent images of children (IIOC), and improving the police response. Crucially a victim feedback panel is also

being devised – scheduled for launch in the first half of 2022 - which will also ensure a wider understanding of our ability to capture VotC.