

National Child Protection Inspections

City of London Police

25 November – 6 December 2019

Foreword

All children deserve to grow up in a safe environment, cared for and protected from harm. Most children thrive in loving families and grow to adulthood unharmed. Unfortunately, though, too many children are abused or neglected by those responsible for their care; or need to be protected from other adults. Some of them occasionally go missing, or end up spending time in places, or with people, that are harmful to them.

While it is everyone's responsibility to look out for vulnerable children, police forces – working together and with other organisations – have a major role in protecting children and meeting their needs.

Protecting children is one of the most important things the police do. Police officers investigate suspected crimes involving children, arrest perpetrators, and have responsibilities to monitor sex offenders. A police officer can take a child in danger to a place of safety and can seek restrictions on offenders' contact with children. The police service also has a significant role, working with other organisations, in ensuring children's protection and wellbeing in the longer term.

As they go about their daily tasks, police officers must be alert to, and identify, children who may be at risk. To protect children effectively, officers must talk to children, listen to them, and understand their fears and concerns. The police must also work effectively with other organisations to play their part in ensuring that, as far as possible, no child slips through the net, and to avoid both over-intrusiveness and duplication of effort.

Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) is inspecting the child protection work of every police force in England and Wales. The reports are intended to provide information for the police, the police and crime commissioner (PCC) and the public on how well the police protect children and secure improvements for the future.

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Summary

This report is a summary of the findings of our inspection of police child protection services in the City of London, which took place during November and December 2019.

We examined the effectiveness of the decisions made by the police at each stage of their interactions with or for children, from initial contact through to the investigation of offences against them. We also scrutinised the treatment of children in custody, and assessed how the force is structured, led and governed, in relation to its child protection services.

Main findings from the inspection

Senior leaders in the force are highly committed to protecting vulnerable people, including children. There is strong governance, overseen by a chief officer and supported by regular meetings of both a vulnerability steering board and a vulnerability working group.

A public protection unit (PPU) operates as a central resource for managing reports of child protection abuse or where the victims are vulnerable adults, such as victims of domestic abuse. The PPU has good working relationships for conducting investigations with the other agencies that form the safeguarding partnership. The PPU is also responsible for managing the risk posed by registered sex offenders (RSOs) who live in the City of London.

These practical arrangements allow swift access to specialist advice or capability because they are widely known throughout the workforce. There is little confusion or delay about assigning responsibility to investigate allegations, thanks to clear terms of reference for the PPU. Supervisors in the unit review all safeguarding and child protection referrals to other agencies, providing opportunities for quality control and escalation when there is high risk – for example, when a child may be vulnerable to exploitation.

PPU staffing levels are good even though it can be difficult to recruit and retain detectives. There are good ratios of supervisors to officers and caseloads are manageable.

The force's response to reports of missing children was excellent and frontline staff in all roles responded to these incidents as priorities. Recognising when children were at risk was also reflected in the way staff dealt with children when they were in custody. We saw some highly effective practice and support being provided to these children by the custody staff, and prompt referrals being made to organise support for vulnerable children.

Throughout the inspection, we encountered highly motivated staff and managers working tirelessly to help vulnerable children. Senior leaders are working to improve the management of risks to children and to meet the ever-increasing demand for child protection. Other agencies involved in safeguarding children told us about strong and effective joint working arrangements. The force understood the challenges of working with agencies across the Greater London area. Officers and staff used escalation and problem-solving methods to deal with risk and vulnerability that crossed borders, and where initial responses didn't meet the needs of vulnerable children.

The workforce was aware of the threat to children from organised crime, including county lines, and from exposure to gangs. We saw examples of good work by frontline officers responding to incidents involving children. However, we found that they often lacked experience or weren't fully trained to recognise the importance of 'capturing the voice of the child' or seeing wider risks for children beyond the incident at hand.

The case audits that formed part of this inspection highlight the need to improve some of the force's responses to children in need of help and protection. Even in the specialist PPU, vulnerability and risk aren't recognised consistently. Too often, decisions about actions to reduce risk to children aren't made early enough or with sufficient information. Consequently, early opportunities to support children at risk, including those who live outside the city, are missed.

The force is doing little to identify, pursue or disrupt online offenders involved in the downloading or distributing of indecent images of children in its area. Its management of RSOs isn't robust enough. Supervision of these individuals is insufficient to demonstrate effective risk management.

The unique circumstances of the City of London – its small geographical area, the population demographics and its relative affluence – mean that the response and demand towards vulnerable children are different from those in other forces. We saw some evidence of highly effective practice but also other aspects where we were very concerned about the quality of the force's level of service.

Specific areas for improvement include:

- speaking to children, recording their behaviour and demeanour, and making sure their concerns and views are heard and inform decisions for their welfare;
- considering the wider risks posed to children when they are found in high-risk situations and there are concerns that they may be being criminally exploited;
- ensuring that flags and markers are used more effectively on force systems to alert the workforce to risk and vulnerability;
- ensuring consistency in the meaningful and timely supervision of investigations, so that opportunities are pursued, and cases aren't unnecessarily delayed;
- reducing delays in holding strategy discussions or multi-agency management meetings, particularly those to safeguard children living outside the city area;
- making sure there is timely support from appropriate adults (AAs) for children in police detention;
- ensuring that supervision in offender management adds value; and

- ensuring a robust and consistent approach to dealing with intelligence about online offending and those who distribute indecent images of children.

During our inspection, we examined 39 cases where the police had identified children at risk. We assessed the force's child protection practice as good in 14 cases, as requiring improvement in 10 cases, and as inadequate in 15 cases. The force needs to do more to make sure that it provides a consistently good service for all children.

Conclusion

City of London Police is clear in its commitment to protecting vulnerable children and has made it a priority to protect those who are vulnerable. The force has a PPU with specialist capabilities to tackle those who are a risk to children and to investigate with sensitivity the most complex offences.

The force understands what safeguarding means, and it contributes to an effective multi-agency partnership that is well governed and enables the professionals across different agencies to work closely together to protect children.

Despite providing vulnerability training to most of its workforce, we found that staff and officers throughout the force had little understanding of the importance of capturing the voices of children and so understand their perspectives.

Officers and staff who manage child abuse investigations are committed and dedicated. However, in too many cases, we found inconsistent recognition of risk and weaknesses in investigations that weren't addressed by effective supervision. The force does little to address the risk to children from online offending and poor management of RSOs. This means that the force is insufficiently focused on reducing the risk of sexual harm to children.

We have made recommendations that will help improve outcomes for children if the force acts on them. We will revisit City of London Police no later than six months after the publication of this report to assess its response.

1. Introduction

The police's responsibility to keep children safe

Under the Children Act 1989, a constable is responsible for taking into police protection any child whom they have reasonable cause to believe would otherwise be likely to suffer significant harm. The same Act also requires the police to inquire into that child's case. Under section 11 of the Children Act 2004, the police must also ensure that, when carrying out their functions, they have regard to the need to safeguard and promote the welfare of children.

Every officer and member of police staff should understand that it is their day-to-day duty to protect children. Officers going into people's homes on any policing matter must recognise the needs of the children they may meet, and understand what they can and should do to protect them. This is particularly important when they are dealing with domestic abuse or other incidents that may involve violence. The duty to protect children also includes any children who are detained in police custody.

In 2018, the National Crime Agency's strategic assessment of serious and organised crime established that child sexual exploitation and abuse are some of the gravest serious and organised crime risks. Child sexual abuse is also one of the six national threats specified in the Strategic Policing Requirement under section 37A of the Police Act 1996.

Expectations set out in *Working Together*

The statutory guidance published in 2018, [*Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children*](#), sets out what is expected of all partner organisations involved in child protection (such as the local authority, clinical commissioning groups (CCGs), schools and the voluntary sector).

The specific police roles set out in the guidance are:

- identification of children who might be at risk from abuse and neglect;
- investigation of alleged offences against children;
- inter-agency working and information-sharing to protect children; and
- the use of emergency powers to protect children.

These areas of practice are the focus of our child protection inspections.

2. Context for the force

At the time of our inspection, City of London Police had a workforce of approximately:

- 750 police officers;
- 438 police staff;
- 5 police and community support officers (PCSOs);
- 78 members of the special constabulary;
- 6 police support volunteers; and
- 15 volunteer police cadets.

At just over one square mile, the City of London represents the smallest territorial force area in the country. Protecting a high concentration of nationally important sites in an area of historical, cultural and critical economic importance presents unique challenges.

The City of London Police doesn't have a PCC. It is instead held to account by the City of London Corporation Court of Common Council acting as a police authority in accordance with the provisions of the City of London Police Act 1839 and the Police Act 1996. This arrangement:

- holds the commissioner to account;
- ensures value for money in the way the force is managed; and
- sets policing priorities considering the views of the community.

These and other key duties are specifically delegated to the police authority board, which fulfils the combined functions of PCC and police and crime panel, and sets out the priorities that form the core of the policing plan.

The city's residential population of just over 9,400 (approximately 1,500 of whom are children) swells each day by over half a million people, working predominantly in professional finance and service industries such as insurance, legal and banking.

There are five schools attended by 2,250 children who mostly travel into the city for their education. There are also five nurseries with 285 places, which are mostly taken by the children of commuters. Most of the city's resident children travel to surrounding London boroughs for their schooling. There are no children's homes in the city area.

At the time of our inspection the city was rapidly increasing social and entertainment aspects, with a vibrant night-time economy and an increasing density of shops, restaurants and bars. Currently, there are approximately 5,800 hotel beds but a large investment in building new hotels will increase this total to 8,000 by 2024. Many more

people will therefore be remaining in the city area outside the hours of the traditional professional working week.

The force balances national obligations – for example, counter-terrorism, public order, cyber-crime and vulnerability – with local concerns such as road safety and acquisitive and violent crime. As the police force for the nation’s financial heart, its core mission is to protect the UK from economic crime and to maintain the City of London as one of the safest places in the country. It aims to achieve this through:

- a front line that keeps people safe and is responsive to the needs of the City of London;
- professional investigators who put victims first and seek positive outcomes for them;
- being a centre of excellence that protects the UK against economic crime and pursues offenders; and
- using intelligence to track offending patterns and identify policing priorities.

The square mile of the City of London is surrounded entirely by the 32 boroughs that make up Greater London, home to 9 million people and policed by the Metropolitan Police Service (MPS). The two forces collaborate and co-operate closely on many aspects of planning and delivering operational policing. This includes full access to some of the MPS command and control and intelligence systems. Several underground lines and mainline railway routes pass through the square mile, including many busy stations. The British Transport Police (BTP) is responsible for policing these stations and routes.

There is a single social services department for the City of London and two NHS CCGs, Tower Hamlets CCG and Hackney CCG. The City of London collaborates with the London Borough of Hackney for its safeguarding partnership arrangements. The local safeguarding children board is an early adopter of recommendations from *Working Together* and has formed a safeguarding children partnership.

The most recent Ofsted inspection (July 2016) of children’s social care (CSC) services in the City of London reported as follows:

Judgment	Grade
Children who need help and protection	Good
Children looked after and achieving permanence	Good
Management, leadership and governance	Outstanding

3. Leadership, management and governance

The chief officer and senior leaders have established a system that supports frontline policing to reduce risk to vulnerable people and children

The commissioner and chief officers aim to achieve a front line that is responsive to the needs of the city and keeps people safe, with:

- professional investigators who put victims first and seek positive outcomes for them; and
- an intelligence function that tracks offending patterns and identifies policing priorities.

Supporting vulnerable people features as one of the force's eight policing priorities and child protection activity is clearly included in this area.

A chief officer (Commander Operations) has the lead for vulnerability. The specialist PPU, which has its own line management, is responsible for investigating crimes committed against vulnerable people and children. Staff from this unit also manage risk posed by RSOs and other violent offenders.

Daily intelligence management meetings, and crime and management meetings, are designed to co-ordinate responses and alert managers and leaders to significant concerns and incidents. This system means that any high-risk child protection incidents can be assessed and managed with appropriate resources being tasked by force leaders.

Governance in this area is through the regular meetings of the vulnerability steering group, chaired by the Commander Operations. This forum is supported by a vulnerability working group, chaired by the Superintendent Operations. A risk register records the management of any matters that affect the force's ability to deal with vulnerability.

Chief officers chair force-level meetings that review performance and determine resources for force-level tasking. Daily and monthly reports provide quantitative performance data for managers on vulnerability-related subjects, including children who are at risk. Analysts are working on developing additional qualitative information to support both strategic and operational activity.

Performance team and intelligence analysts have produced vulnerability profiles for both adults at risk and child protection following a request from the vulnerability

working group. This information will support the force in tackling trafficking and the criminal exploitation of children in its area. The force told us that these profiles would give the workforce and other safeguarding agencies more help to tackle issues including child exploitation by gangs and county lines.

This is positive, but the force must make sure that records are comprehensive and accurate to fully benefit from this investment. The force has produced a 'City profile 2019' that includes analysis of households, ethnicity, the make-up of households and other factors affecting residents in the area. Despite this, many records we saw were missing ethnicity data. The team that produced performance reports told us that they had also identified this weakness. These profiles can help forces to understand and tackle issues that may not be immediately apparent, such as harmful traditional practice and trafficking, as well as forced marriage and female genital mutilation.

Although the force has very different geographical and demographic profiles from those of other UK police forces, its leaders actively participate in national policing forums and strive to incorporate learning from national situations into best practice locally. They have contributed to the [National Vulnerability Action Plan](#) and incorporated feedback from it into their own vulnerability action plan, which is overseen by the working group.

Force leaders have yet to instil in all staff the importance of 'capturing the voice of the child'

In its vulnerability action plan, the force had highlighted a section: "Develop clear processes to ensure that 'the voice of vulnerable victims and witnesses' is heard". This message hadn't been very well understood despite this and messages from senior leaders emphasising to the workforce the value of this activity to safeguarding. Our case audits, focus groups and interviews with staff and managers in virtually every department revealed that the workforce didn't know well enough how to explore the child's perspective. Leaders need to do much more to explain and embed a fundamental change in the force's approach to safeguarding and child protection.

Regular audit data given to leaders doesn't provide insight into the quality of safeguarding activity

The force's dedicated audit capability, which provides data to chief officers, is largely focused on crime data standards and crime-recording integrity. Audit information could also be used to understand the quality of child protection investigations or identify repeat reports of crime against children, or when there are repeated records of concern for a child in child protection or domestic abuse incidents. Instead, safeguarding references in audit findings were limited to recording whether a case had been referred or notified to the social care authorities. Without such qualitative audit data, leaders don't have the full picture about the difference that implementing a particular policy is making. For example, if officers don't ask children about their situations and what they would like to be changed and record this, it is harder for the force to improve its safeguarding and child protection service.

The force has invested in a specialist team for vulnerability and child protection

The PPU is well resourced and has sufficient staff to deal with the current level of investigations for vulnerability and child protection. There are good ratios of supervisors to officers and caseloads are manageable. The staff are well trained. They have either received specialist detective training, including the specialist child abuse investigators' development programme (SCAIDP), or they are being supported to work towards these national qualifications.

The PPU's terms of reference include investigating concerns and allegations of:

- child abuse;
- child criminal exploitation (CCE) and child sexual exploitation (CSE);
- domestic abuse;
- honour-based violence and other culturally based crime;
- all sexual offences; and
- the management of sexual and violent offenders.

The force has increasing and competing demands on its investigative resources from economic, acquisitive and security-related crime and incidents. This makes it more difficult to maintain effective and high-quality child protection services. A recent review of the structure and workload of a range of investigative units concluded that the PPU was to be retained; its hours of operation were to be maintained; and its responsibility was to increase to include hate crime, trafficking and modern-day slavery. This demonstrates a strong leadership commitment to vulnerability and child protection.

The force values and invests in training, but fundamental gaps remain in the workforce's knowledge of vulnerability

The force has its own learning and development department. Staff receive some core training programmes, such as initial training, detective training and SCAIDP, with other forces such as the MPS. City of London Police arranges training days as part of shift patterns, and continuing professional development (CPD) is supported and provided.

It was recognised that few City of London police officers were directly involved in major investigations such as homicide, complex child abuse and those cases that led to other significant case reviews for domestic abuse and child protection deaths. The force runs events and invites speakers such as senior investigating officers to help with learning from nationally important cases. The National Police Chiefs' Council helps to compare the force's vulnerability arrangements with other forces and to gauge its responses to the county lines threat.

So far, 93 percent of the workforce have received College of Policing (CoP) vulnerability training, and there is a plan to provide this to the remaining staff. Following staff feedback, the force is developing a further course. This will reinforce important messages and cover in more depth topics such as CSE, mental

health vulnerability, domestic abuse and effective early 'golden hour' actions in an investigation.

Despite the force providing vulnerability training to much of its workforce, we found little evidence to show that they considered the potential negative effects of adverse childhood experiences for children they dealt with. Managers and staff understood the basic concept of vulnerability recognition. They would record concerns on public protection notices (PPNs) to 'capture the voice of a child', but were generally unaware of cumulative vulnerability and the higher risk that these children faced. Responding officers and those in operational support roles weren't prompted to seek to understand the child's perspective in an investigation. The workforce remained largely unaware of the importance of this.

City of London Police fully participates in local children safeguarding partnership arrangements

The force contributes to, and benefits from, a safeguarding partnership with its local authority and NHS CCGs in conjunction with the London Borough of Hackney. It also fully participates in the pan-London safeguarding arrangements, and contributes to these strategic and operational forums at appropriate levels.

A senior CSC manager told us that they had an excellent relationship with the police and particularly good operational co-operation with PPU officers. The safeguarding partners concluded that it wouldn't be necessary to establish a co-located multi-agency safeguarding hub (MASH) after reviewing the arrangements for referring child protection and safeguarding concerns. The volume of referrals was low, and face-to-face strategy discussions were easy to arrange because of short travelling distances and good existing engagement of safeguarding professionals.

The City and Hackney children safeguarding partnership's independent commissioner described the force as having an appetite for engaging with safeguarding, but said that the impact of its work was hard to measure.

The safeguarding partners work closely together to tackle concerns affecting the quality of service provision. A current example was the involvement of CSC in attempting to recruit further AAs to support children in custody. The partnership had also completed some good work on establishing an effective street triage response to mental health crises. This diverted vulnerable people and children from custody to receive earlier NHS help.

Leaders and managers support workforce health and wellbeing

Leaders are committed to supporting the workforce and its wellbeing. Mechanisms such as the [trauma risk management](#) process are available for managers to refer staff to occupational health services. PPU staff receive mandatory annual psychological screening support in recognition of potential additional adverse consequences associated with their role. The force also has mental health first aiders and the MIND charity's blue light support available.

Recommendation

We recommend that City of London Police should immediately review the vulnerability training for its staff in all roles, to improve the understanding of the importance of engaging with children and in understanding their perspectives to improve safeguarding activities that deliver better outcomes for those children.

4. Case file analysis

Results of case file reviews

For our inspection, City of London Police selected a random sample of cases and self-assessed how it had dealt with 30 child protection cases. Force assessors graded the practice as good in 22 of the 30 cases, 8 as requiring improvement and none as inadequate. We assessed the same cases and graded the force's practice as good in 14 cases, as requiring improvement in 7 and as inadequate in 9.

Cases assessed by both the force and HMICFRS

Force assessment:

- 22 good
- 8 requires improvement
- 0 inadequate

HMICFRS assessment:

- 14 good
- 7 requires improvement
- 9 inadequate

The size of the force area and the small number of child protection cases dealt with by City of London Police limited our additional audit opportunity to only nine further cases.

Nine additional cases assessed only by HMICFRS

HMICFRS assessment:

- 0 good
- 3 requires improvement
- 6 inadequate

Our audits identified more cases where investigations required improvement or were inadequate. For the additional cases that HMICFRS assessed, these findings were amplified. Our inspectors focus on the outcomes children experience as a result of police involvement. We consider the experience from the child's perspective, and whether vulnerability and risk are sufficiently recognised and addressed through effective safeguarding measures.

Many of the force's own audits emphasised following procedures and filling in forms. They were also concentrated on the initial response and the immediate matter at hand rather than considering the overall service across the lifetime of the incident. Wider safeguarding considerations weren't a consistent focus. Poor record keeping was a feature. The child's voice was frequently absent both in the report and during decision making.

Self-audits by the force often didn't pay enough attention to the quality of safeguarding and child protection. They missed the potential risk and consequences of cases being closed quickly, without meaningful referral and strategy discussions with safeguarding partners. Or, where records were missing, so was vital information that identified where other children or even the principal child remained at potential risk of harm.

However, we upgraded four cases where the force had considered its work to require improvement to a grading of good. This was because the omissions identified by force auditors tended to be minor procedural matters or small recording issues whereas the overall activity showed effective safeguarding and promoting of the welfare of children. An example is a case where two people arrested for immigration offences were quickly identified by custody staff to be teenage children. They were released from arrest, taken into police protection and treated as unaccompanied asylum seekers with prompt referrals to the local authority. Some minor omissions in records and process didn't undermine the effective safeguarding.

Of the 39 cases assessed, we referred 6 back to the force because our analysis of the records found that serious concerns remained. For example, failures to ensure that police or partner agency activity was protecting children, or where it appeared that a child may still be at risk of significant harm from an offender because there hadn't been a meaningful intervention. The force responded to all our concerns. Senior managers reviewed the cases, updated risk assessments and resolved the outstanding issues.

Breakdown of case file audit results by area of child protection

Cases assessed involving enquiries under section 47 of the Children Act 1989¹

Enquiries under section 47 of the Children Act 1989:

- 0 good
- 1 requires improvement
- 6 inadequate

Common themes were that the files included:

- poor case management by investigators and supervisors leading to delays;
- poor recognition of the voice of the child;

¹ Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

- inconsistent records of further working with other agencies once the case was past its initial stage; and
- missing wider safeguarding concerns for other children.

Cases assessed involving referrals relating to domestic abuse incidents or crimes

Referrals relating to domestic abuse incidents or crimes:

- 1 good
- 4 requires improvement
- 2 inadequate

Common themes:

- timely attendance of responding officers;
- children not being sufficiently recognised as being at risk in domestic abuse incidents; and
- officers not consistently eliciting the voice of the child and recording this to inform risk analysis and referrals.

Cases assessed involving referrals arising from incidents other than domestic abuse

Referrals arising from incidents other than domestic abuse:

- 5 good
- 0 requires improvement
- 0 inadequate

Common themes:

- the force responding well initially when contact is through the force control room (FCR);
- use of police powers appropriate and proportional, and initially effective;
- the voice of children and wider safeguarding issues not always considered; and
- initial supervision by designated officers present and decisions recorded.

Cases assessed involving children at risk from child sexual exploitation

Cases involving children at risk of CSE both online and offline:

- 1 good
- 2 requires improvement
- 3 inadequate

Common themes:

- initial response usually good, although wider risks and safeguarding activities not always identified;

- risks to other children not always considered and the child's voice not sufficiently clear in records; and
- enquiries to identify and locate potential perpetrators sometimes overlooked, and the consequences of delays not considered in strategy meetings.

Cases assessed involving missing children

Children missing:

- 3 good
- 0 requires improvement
- 0 inadequate

Common themes:

- the FCR consistently using [THRIVE](#) to assess and grade the risk to the child;
- initial frontline response rapid and highly effective; and
- information from force records available to initial responders to help them locate missing children.

Cases assessed involving children taken to a place of safety under section 46 of the Children Act 1989²

Children taken to a place of safety by police officers using powers under section 46 of the Children Act 1989:

- 3 good
- 0 requires improvement
- 0 inadequate

Common themes:

- officers considering the circumstances of vulnerable children and making effective decisions to remove children with appropriate use of the power;
- officers liaising well with emergency CSC services; and
- inspectors supervising cases.

Cases assessed involving sex offender management in which children have been assessed as at risk from the person being managed

Sex offender management where children have been assessed as at risk from the person being managed:

- 0 good
- 2 requires improvement

² Section 46(1) of the Children Act 1989 empowers a police officer, who has reasonable cause to believe that a child would otherwise be likely to suffer significant harm, to (a) remove the child to suitable accommodation and keep him/her there, or (b) take such steps as are reasonable to ensure that the child's removal from any hospital, or other place in which he/she is then being accommodated, is prevented. A child in these circumstances is referred to as 'having been taken into police protection'.

- 2 inadequate

Common themes:

- supervision often superficial and not adequately directing offender management;
- risk to children and vulnerable adults not consistently identified and recorded; and
- referrals to safeguarding partners delayed and insufficient.

Cases assessed involving children detained in police custody

Children in police custody:

- 1 good
- 1 requires improvement
- 2 inadequate

Common themes:

- custody staff not fully understanding their responsibility to seek appropriate alternative accommodation for detained children;
- attendance of AAs at the custody office timed to coincide with other events, such as interviews, rather than to promote the welfare of the detained child;
- referrals for children in custody always made to CSC; and
- referrals can be delayed, and wider/more complex vulnerability not considered.

5. Initial contact

The force control room prioritises response to calls where there is vulnerability and risk to children

City of London Police has invested in its FCR and trained its staff to complete THRIVE risk assessments and recognise vulnerability. This supports the timeliness of frontline response to calls when there is high risk – for example, reports of missing children.

The control room is operating, for the most part, highly effectively. We consistently saw the correct level of prioritisation for responding to risk and vulnerability for incidents where children were involved. Supervision of response was good and there were no delays in attending child protection incidents. In the control room, a response intelligence officer (RIO) gives intelligence support to operational teams from both the force and MPS systems.

Vital intelligence on risk and vulnerability isn't being provided consistently to assist frontline officers

Staff were knowledgeable about warning markers for officer safety such as weapons and firearms flags. However, we found that staff and supervisors in the control rooms had only limited understanding about warning markers and flags for risk and vulnerability. The force doesn't always add flags to the system. There is no robust supervisory process to address this inconsistency. Markers and flags should be added to alert officers to important information about vulnerability and risk. These might include the home of a child subject to a child protection plan, homes where there are risks to occupants from domestic violence, or the address of an RSO.

Markers allow the force to use existing information to protect vulnerable people, reduce the risk from offenders and gather new intelligence about the activity of these individuals. Investigating officers and PPU staff should routinely update force systems to alert their colleagues and enhance safeguarding opportunities.

Without flags and markers, vital information can be delayed for several hours while the RIO needs to complete intelligence checks on the various systems. Operational decisions may then be made on incomplete information, or sources of risk not fully recognised. As a consequence, safeguarding measures may be inadequate or completely missed, and children left at risk of harm.

The ineffective use of flags and warning markers is compounded by inconsistent understanding of how to apply these among PPU staff and other investigating officers. Supervisors and managers aren't systematically ensuring that the understanding and activity are in place.

The force policy for the use of body-worn video cameras was unclear

Systems to reinforce and improve the response to risk and vulnerability weren't always being used effectively. For example, the control room didn't always prompt officers to turn on body-worn video (BWV) cameras when responding to domestic abuse incidents. Also, responding officers weren't routinely reminded or prompted to always see children and capture the voice of a child at such incidents.

Body-worn cameras are personally issued to all response and community team staff. Staff and supervisors told us they were unaware of a force policy on BWV. The officers told us they used personal discretion about whether they should turn on the camera at an incident that needed the consent of victims and witnesses. However, some managers told us that the force had mandated the use of BWV at domestic incidents.

With no clearly understood policy, the force is missing opportunities to gather evidence and support victims, thereby reducing the effectiveness of safeguarding activity beyond the initial response.

Case study: domestic abuse incident

Following a 999 call from a distressed woman reporting an assault by her partner, police officers promptly attended the family home. Control room staff didn't find out whether any children were at home or whether the woman had injuries. The responding officers learned that the woman's three-year-old daughter was asleep in the home. They didn't check on the child. They didn't activate body-worn video cameras while investigating.

A supervisor advised the officers to complete a referral form. This was submitted and subsequently shared with children's social care by the PPU. No other investigations took place at the scene, such as enquiries with neighbours. The investigation was closed because the woman didn't wish to pursue any criminal allegations. A subsequent supervisory review by the PPU led to the family being revisited, the child's welfare being checked, and support offered to her mother.

The omissions by those initially responding meant that potential evidence was lost, the child's perspective wasn't fully understood, and risk assessment and safeguarding were delayed and potentially compromised.

Staff don't sufficiently understand the importance of the voice of the child

Many of the control room and frontline workforce we spoke with didn't know about capturing the voice of a child and were unable to display knowledge of its meaning and context. They were unable to articulate the importance of checking the welfare of a child at a domestic abuse incident. Officers and staff told us that they hadn't received any guidance on dealing with a domestic abuse incident where children were present or linked to the family. However, a frontline sergeant stated that the most recent round of vulnerability training for response staff (approximately two months previously) had included the voice of the child. As our case audit reviews showed, many children affected by domestic abuse aren't being spoken with sufficiently, and so their views and needs are being missed.

Specialist safeguarding advice isn't always available for those dealing with emerging incidents

The PPU operates 8am–4pm Monday to Friday. Beyond these core hours, other supervisors are required to provide direction and specialist advice. For example, duty inspectors will check and ratify domestic abuse risk assessments that use the DASH (domestic abuse, stalking, harassment and 'honour-based' violence) checklist. Duty sergeants review occurrences to ensure that PPNs are completed without delay.

While strategy discussions can take place out of hours with CSC staff, these tend to be delayed until PPU officers are available. For most low-risk cases, these arrangements will be appropriate, particularly if officers have the training to recognise when matters need to be escalated. However, historically, the force hasn't had a high level of complex safeguarding demand. Its workforce isn't experienced in dealing with high-risk domestic abuse or culturally supported abuse such as honour-based violence or forced marriage. There has been no additional training to support supervisors, particularly those in temporary or acting roles, to understand vulnerability associated with child trafficking and criminal exploitation.

Low numbers of incidents may reduce the recognition of the need for safeguarding action

The force has a consistent approach to recording and referring safeguarding concerns. Each month 50 to 60 PPNs are submitted. The PPN form covers three areas: child referrals, vulnerable adult referrals and domestic abuse (for which the DASH risk assessment is completed). All PPNs were supervised and reviewed before referral to other agencies. Most children involved lived not in the City of London but in surrounding London boroughs. This meant that, in most cases, once the immediate incident had been dealt with, City of London officers had come to expect that responsibility for continued safeguarding activity after the immediate incident would take place in the child's home force area.

Some senior officers told us that they thought the workforce had a good understanding of vulnerability and the responses required to tackle risk. They cited extensive force training and intranet messages that had reinforced the force's approach to vulnerability. The force had worked closely with safeguarding partners

to develop effective responses for suicide prevention and to mental health crisis. Other forces had helped, such as the MPS that assisted with training on subjects where the force had limited experience, such as CSE and county lines.

Response and community officers told us that the force's main priority was tackling serious acquisitive crime such as theft and robbery linked to the local economy. They would personally prioritise responses to incidents where children were at risk but there was a large consensus that these incidents were very rare. They told us that the force's focus on crime did include some children who were involved in pickpocketing and distraction thefts. For these children, the focus of police officers was initially on detecting and disrupting crime, not on the vulnerability of the children or the identification of those who were organising and exploiting them.

Managers felt that the low number of incidents involving children meant that officers and frontline supervisors weren't fully attuned to recognising and dealing with safeguarding risks.

Case study: initial safeguarding in place but wider safeguarding concerns not addressed

Three children (siblings), aged six years and younger, were left alone in a car the driver had abandoned. Officers didn't see the driver, but the oldest child said it was their father. He was wanted by the Metropolitan Police Service for criminal offences, had a criminal history including drug supply and possession of firearms, and was known to self-harm. Officers took the children into police protection and contacted social care. Checks were made and the children's mother was identified. The children were returned home to her after social workers confirmed that they had confidence that she could keep her children safe.

Although social workers had been contacted quickly, no strategy meeting was held. The officers didn't record the demeanour or the voices of the children. Police records contained no account from the mother as to why her children were alone in the car. The police closed the incident without making further enquiries into the children being abandoned, and without a clear understanding of what action was being taken to protect those children.

Reports of missing children are prioritised

The control room response to missing persons incidents is excellent. Call takers and handlers have received training around missing persons' vulnerability and use THRIVE risk assessments. This ensures that risks to missing children are swiftly and effectively evaluated, graded and assigned to frontline response.

The force understands the profile of children who go missing. Many are visitors in family or school groups visiting cultural and educational sites in the city. Although most children reported as missing in the City of London are from other areas, the response is never compromised. There is good supervisory oversight and appropriate actions are decided on and carried out.

Missing children are always assigned either medium or high-risk status and quickly tasked to response and neighbourhood officers. Supervisory oversight was good as enquiries were taking place. High-risk missing children cases are always assigned to the criminal investigation department as priority investigations.

We saw good recorded evidence of prompt and effective information exchange and multi-agency working when children were reported as missing, including liaison with other police forces. This included clearly updating safeguarding plans.

Case study: excellent response for a high-risk missing child

A 17-year-old boy with mental health issues was reported as missing. He was considered to be highly vulnerable and also, potentially, to pose a risk to others. The incident was quickly assessed as high risk by a supervisor. The investigation was allocated to the force's major crime unit. Priority actions to locate the boy were agreed and undertaken without delay. The force carried out background and intelligence checks. These included asking for a check of NHS records, which provided detail about his mental health vulnerability.

When the child was found, he was jointly visited by a police officer and a mental health liaison officer. Their information update was thorough with the voice of the child clearly recorded. The safety plan for this vulnerable boy was updated and clearly recorded on police systems.

Recommendation

We recommend that, within three months, City of London Police should review its systems and practice to ensure that:

- warning markers and flags are used to alert responders to risk and vulnerability; and
- control room staff have effective systems to help them to prompt frontline responders to follow force policy – for example, to turn on body-worn video cameras when attending domestic abuse incidents.

6. Assessment and help

The force has a clear child protection referral process

The City of London's particular economic and demographic profile means that it has few of the local authority schools, no children's homes and no bail hostels or hostels for the homeless that generate many safeguarding referrals for other forces.

Although the force makes relatively few referrals (50 to 60 a month) to its safeguarding partners, the workforce understands the process well. Staff must complete a PPN. This versatile form contains sections covering child protection, vulnerable adults and the DASH risk assessment for domestic abuse incidents.

Frontline staff told us that they never received any feedback about the outcome of concerns for children that they had raised. This is unfortunate because the workforce is therefore less likely to provide good-quality referrals in the future.

All occurrences are supervised by immediate supervisors and duty inspectors review DASH assessments. PPU supervisors review all PPNs during office hours, including DASH, and then make appropriate referrals. This level of supervision is possible because of the low numbers of incidents where PPNs are required. PPU staff said that most of the child notices were for children outside the force area.

The PPU staff were clear about the thresholds for referral in the safeguarding partnership and holding initial strategy meetings with CSC staff. They told us that the safeguarding partnership had the capacity to deal with the very low number of referrals about lower-level safeguarding concerns regarding local children. As the local authority offices were nearby, PPU supervisors usually attended these meetings in person. This assisted effective multi-agency communication. Most referrals benefitted from a strategy meeting. The PPU staff would act on the decisions from the strategy meetings, including joint home visits to assess children's vulnerability and gather evidence.

There are no delays in the force sharing safeguarding information with the local children's social care team

The safeguarding partnership agreed to operate a 'virtual MASH' when CSC needed information from partners to decide which team was the most appropriate to deal with a concern. The virtual MASH had no shared IT system, but partners exchanged secure emails with a 24-hour response time for the information to be provided. Two or more police referrals on the same vulnerable person or child triggered a virtual MASH. More complex concerns raised by schools to CSC generated the majority of requests to the PPU for MASH information.

For urgent cases, strategy discussions were held by telephone. With small police and CSC teams, staff worked frequently with each other and had established confidence and trust.

The force is asked infrequently to contribute to child protection conferences in the City of London. When these multi-agency conferences are held, a PPU sergeant attends and also deals with any subsequent child protection review conferences.

The force is able to support victims of domestic abuse

The force and its safeguarding partners are developing a strategy to tackle violence against women and girls. A vulnerable victim advocate is employed in the PPU. Their role is to provide support and assistance to all vulnerable victims and particularly those affected by domestic or sexual abuse.

In tackling domestic abuse, the force and its partners follow the nationally endorsed guidance approach from SafeLives, a national domestic abuse charity, to victims, and make referrals to the multi-agency risk assessment conference (MARAC). The PPU detective inspector is the MARAC chair and explained that the relatively low volumes of referrals of high-risk domestic abuse allowed them to include lower-risk cases in the agenda of the meeting (average of two cases per month). This helped safety planning for victims and their children. The MARAC dealt with cases where families had homes in the City of London as well as other areas, so they had developed arrangements to share information to safeguard the families outside their immediate area.

Effective information sharing with other forces and agencies is a challenge for the force

Obtaining timely information from other forces and agencies is a major problem when dealing with incidents involving vulnerable people or those who present a risk, according to managers and staff in various roles. Our case reviews showed that the force sometimes received no meaningful reply or feedback from referrals to other areas after incidents in which initial safeguarding activity had taken place and officers had completed a PPN. The force couldn't be satisfied that the safeguarding activity it had initiated had continued at the right level or that the concerns had been addressed. Records were left incomplete with no information as to whether the force needed to take further action. More should be done to identify and discuss the potential consequences for vulnerable children if these referrals aren't followed up or another area fails to respond. Despite some good initial responses, subsequent drift and lack of ownership can potentially reduce the effectiveness of the force's intervention.

There is a parallel in the force's engagement with Operation Encompass. Senior leaders told us their policy is to promote this initiative to engage with schools to support children from homes where domestic abuse incidents are reported. However, they told us the force was yet to make any referrals to schools either in the city or in London boroughs.

PPU staff recognise these issues but haven't formally escalated them so that they can be raised at the strategic level in the context of the children safeguarding partnership and pan-London mechanisms.

Case study: ineffective cross-border safeguarding activity may leave children at risk

A 17-year-old girl and 13-year-old boy attempted to book a hotel room in person. Staff refused the request and notified the police, including some limited personal details of the children, who had left the hotel by themselves. City of London Police contacted the force covering the address the boy had given and asked them to conduct welfare checks on him and to obtain fuller details of the girl. Despite the local force visiting the address on eight occasions, this action remained outstanding for nine days. Eventually, contact at the address was made with a person claiming to be the boy's older brother. An appointment was made to see him the following afternoon. Supervision in this case was ineffective, failing to escalate activity or sufficiently challenge what was happening, and delays meant that the girl wasn't identified or seen quickly enough. This meant that the vulnerability and risk to both children weren't properly assessed, nor were referrals passed to children's social services.

7. Investigation

The PPU is well resourced and has sufficient staff to deal with the current level of investigations for child protection and vulnerability. There are good ratios of supervisors to officers and caseloads are manageable. The staff are well trained and either have received specialist training (SCAIDP and PIP2) or are working towards this.

PPU officers are specially trained to interview children and vulnerable people. They understand how to refer cases to CSC for strategy meetings and for joint investigation under section 47 of the Children Act. The team is supported by a vulnerable victim advocate with plans to add an additional post to develop this support.

Supervisors hold strategy discussions and attend in person strategy meetings called by CSC. They know about the multi-agency guidance in *Working Together* and in the [pan-London Child Protection Procedures](#). This guidance helps to co-ordinate child protection investigations which that cross local authority borders.

We were told that the team had a good ratio of experienced supervisors who would direct investigations. Investigators' workloads were managed by supervisors using a spreadsheet showing the type and status of each live case. Supervisors regularly reviewed PPU investigations and directed investigative strategy, lines of enquiry, THRIVE issues, victim support and engagement with (or referral to) other agencies.

PPU supervisors told us they had a robust approach to arresting and interviewing suspects. At the time of this inspection, all suspects in PPU cases had been arrested and bail conditions used. None of these cases concerned suspects released under investigation (RUI). The force collected data on numbers of arrests and monitored the occasions when RUI had been used.

Initial investigative activity can be undermined by poor case management and ineffective supervision

Despite a generally good initial response by PPU officers to child protection investigations, we also saw some cases where actions weren't swiftly progressed and supervision was ineffective. Drift and delays undermined the quality of some investigations. Some other cases were closed at an early stage without strategy meetings being held.

Supervision of child protection investigations in the PPU was inconsistent, and the reviews failed to improve the situation with smart investigation plans and clear direction. For some children, wider safeguarding concerns weren't sufficiently identified by either the investigating officer or the supervisor, and investigations were

closed before risks from perpetrators had been fully dealt with. This means that some children were potentially being left at risk of harm.

Opportunities to reduce vulnerability weren't always discussed adequately with safeguarding partners. This meant that these investigations were less effective, and the children potentially at further risk, because the underlying matters hadn't been fully considered or addressed by police officers or safeguarding partners.

In some of the investigations we reviewed, insufficient attention was being directed towards the best outcomes for the children involved. This view was reinforced by investigating officers not considering the needs of children or detailing what activity they were taking to safeguard victims and witnesses.

Case study: ineffective investigation and case management

The force was aware of a family where there had previously been concerns that the parents were abusing the children. One child had previously left the family home and was being supported by children's social care following concerns that he was being assaulted. Further concerns were raised about risks to the remaining children from parental assault and neglect, and about honour-based violence. It was alleged that the children's father was contaminating their food and adding bleach to their shampoo. It was recorded that the family didn't wish to pursue any complaint.

Despite the views of the adults in the family, these allegations needed to be investigated robustly. The concerns weren't recorded as separate criminal allegations, and this meant that joint-agency child protection investigations weren't being expedited by the PPU – for example, a joint home visit with social workers to check on the children and assess evidence. No strategy meetings were held and MASH enquiries to gather information from other agencies such as schools and health weren't requested. There was no effective plan to gather evidence or elicit the voices of the children to better understand their situation. There was no effective supervision to challenge this investigative drift or to escalate activity to safeguard the children.

The force has invested in body-worn video cameras, but investigators can face delays in accessing it

It is positive that frontline officers are issued with body-worn cameras, which are recognised as highly effective tools to gather evidence of scenes including the demeanours of a victim, witness and offender and their initial verbal accounts. Personal body-worn cameras are issued to all response and communities team staff. For cases where there are extremely vulnerable victims – for example, families affected by high-risk domestic abuse involving children – the use of BWV can provide investigators with the immediate responses and demeanour of victims, and so negate the need for witnesses to appear in court.

We were told that only the recording officer could view BWV footage unless they granted access to other named staff when downloading it to the force system. This could cause significant delays to investigations, particularly if the recording officer

left duty before the case was assigned to a named investigator. Lack of general or wider access to BWV footage meant that PPU staff couldn't access it for help in making referrals or for some strategy discussions.

Public protection unit investigators have good access to the specialist support

Managers and officers said that they could speak without delay to the Crown Prosecution Service (CPS) and also to the rape and serious sexual offences (RASSO) units, staffed by specialist CPS lawyers, for advice. The force participated in a [cracked trial](#) review group with the CPS, with representatives from the specialist domestic abuse court and the MPS. This group focuses on domestic abuse cases and aims to learn from them and pass on feedback to improve the quality of future cases.

The number of allegations of sexual offences against children in the force area is very low. However, the force has prepared itself to respond to this crime type. A cohort of sexual offence investigation trained officers provide a 24/7 specialist capability to support victims of sexual assaults and to gather evidence of offences. The force has a dedicated facility, the Phoenix Suite, for victims of child abuse and sexual abuse. The force also has full access to sexual assault referral centres (The Havens) provided at three locations across London.

The PPU has good access to translation services, interpreters and intermediaries to help its work with vulnerable victims and their families.

The force's high-tech crime unit (HTCU) will prioritise PPU cases because vulnerable victims are involved. Officers told us that these investigations were completed with no excessive delays. The HTCU aims for results in 90 days for most of its work, dealing with devices associated with economic crime. For PPU priority cases, computers and devices are scanned, copied, reviewed and returned to the investigating officer in ten days. This is possible because the PPU submits only a very low number of devices (five cases had been submitted during 2019).

Around 200 officers and staff from across the force are trained to triage and download evidence from mobile phones in special kiosks located in police stations. The force has invested in the ACESO system, which safely downloads data stored in SIM/USIM cards, handsets and memory cards. This allows officers to return victims' phones without delay. The system is networked and searchable, and there are plans to develop it so that any image retrieved during a download can be searched against the national child abuse image database (CAID). But this awaits national rollout. Currently, officers are told to seek PPU guidance when a phone is suspected of holding indecent images of children. An agreement with MPS gives the force access to CAID.

Online sex offending isn't robustly investigated

The force has three trained members of staff who can access the child protection system (CPSys). This uses software to identify individuals who share indecent images of children. Trained undercover online operatives in the serious organised crime team can be used for investigations involving CCE and online child abuse.

We were told that a member of the cyber unit should dip-sample CPSys on a monthly basis (many forces do this daily) to identify any high-risk cases. However, officers told us that no investigations have been identified or launched in the city as a result. Any cases that are identified would be given to the PPU for investigation, as would any referrals from the child exploitation and online protection command, or any other sources concerning the possession and distribution of indecent images of children.

These investigations are vital to identify offenders who, as well as viewing indecent images, may also have a propensity to physically sexually abuse any children they have access to.

Officers said that it was difficult for them to clearly identify potential offenders from the intelligence they were sent. They also said that they had limited capacity because of working on other force priorities such as economic crime. If this is the case, the risk hasn't been sufficiently escalated to senior managers to resolve the problem.

The force wasn't proactively using the intelligence available from CPSys. It was potentially missing opportunities to identify offenders with a sexual predilection in its area. Alternatively, it could pass the intelligence to other forces for addresses outside the city area. However, at the time of this inspection, the force didn't have an effective system to expedite such investigations.

Some child sex offenders may continue to act with impunity because the force isn't following a robust procedure to investigate intelligence about online sexual offending. Without a structured and robust approach to potential locations where indecent images of children may be being accessed or distributed, the force isn't adequately pursuing those who may be a risk to children.

Officers have limited experience in investigating child sexual exploitation and this may affect their ability to deal effectively with risks to some vulnerable children

CSE investigations are mostly complex. Often the vulnerability of a child increases as they are groomed over time and exposed to escalating risk. As a result, these investigations are usually carried out by the police and safeguarding partners where the child lives. We were told that there had been no reported cases of CSE affecting children living in the city. The cases we reviewed concerned children who were recognised by the force as being at risk of CSE but lived outside the city.

However, the nature of CCE often means that children will cross force borders and may commit offences or come to the attention of officers far from home. This situation is particularly relevant to policing in the City of London because it is a small affluent area at the centre of the metropolis and served with an extensive transport network. Officers must have the training and skills to recognise a child's vulnerability and act to safeguard them. They must also be able to identify the presence of potential offenders and tackle these, both immediately and by gathering intelligence to reduce future risk.

The force's initial response and investigation of incidents of CSE-related vulnerability were good and officers dealt effectively with the immediate concerns. However, subsequent actions weren't always robust, and wider safeguarding risks were inconsistently recorded, communicated and addressed.

Case study: ineffective activity to tackle all risks

An armed unit stopped a vehicle after receiving intelligence about its occupants. Two girls, aged 15 and 17, were in the vehicle. Both possessed cannabis and were with male gang members known to police outside the City of London. The 15-year-old was under the influence of drugs and a police national computer warning flag indicated that she was at risk of CSE. The officers took her into police protection but not the older girl, who should also have been considered as a child at risk. A supervisor described this girl inappropriately as being “confident and streetwise”. PPNs were submitted and these were reviewed by PPU supervisors later in the day.

Staff in the PPU recognised that the children were at risk and arranged a visit to the 17-year-old’s home address elsewhere in London. They also identified that the details of the incident had been poorly recorded and didn’t contain sufficient information about the individuals in the vehicle who posed a risk. Amended details were added to the PPNs and shared with the force relevant to where the girls lived. However, despite one of the girls being taken into police protection, the force has no records of any strategy meetings or multi-agency referrals taking place to address the vulnerability of the girls or tackle the potential risk posed by the males.

Recommendations

We recommend that City of London Police should immediately act to improve child protection investigations by ensuring that:

- there is effective supervision;
- timely referral and strategy discussions take place; and
- body-worn video is accessible to all investigators.

We recommend that, within three months, City of London Police should act to improve child protection investigations by reviewing its systems for investigating online child abuse and by establishing effective arrangements to identify and tackle those who download and distribute indecent images of children in its area.

8. Decision making

The use of police protection powers was appropriate in all the cases we saw

City of London police officers have a good understanding of when children are at risk of significant harm in acute situations and take appropriate steps to safeguard them using the powers of police protection under section 46 of the Children Act 1989.

Police and CSC managers have worked together to ensure that thresholds for intervention in these cases are understood and that communications are effective. This includes close liaison between officers initiating police protection and inspectors responsible for supervising the process as designated officers. In all the cases we saw, officers made timely referrals to CSC.

Some PPNs had minor omissions in recording referrals, and designated officers didn't always sign off the ending of the use of police protection powers. But overall, we found excellent knowledge and actions of response staff and their supervisors to protect children at risk.

CSC managers praised the force's use of powers of police protection particularly with unaccompanied child asylum seekers. Children were quickly referred, and CSC were able to either accommodate them or contact other local authorities where the children lived to take responsibility for safeguarding.

Case studies: children safeguarded by officers using protective powers

1. Members of the public called 999 when they saw a mother assaulting her two-year-old daughter. Police officers attended promptly and investigated the incident, arresting the mother and taking the child into police protection. An inspector was contacted and managed the incident as designated officer, ensuring early contact with CSC and instructing intelligence checks on the child and her family. A strategy discussion took place and police and CSC agreed on a joint investigation. The girl was placed with her father and, following a child protection conference, she was made the subject of a child protection plan. The child's mother was charged and convicted of assault and being drunk in charge of a child.
2. Two young men were arrested by officers on suspicion of committing immigration offences. During the custody procedures, it was quickly established that they were teenage children who were unaccompanied asylum seekers. They were immediately de-arrested and placed into police protection. CSC were contacted and a referral was made so that they could be accommodated safely while their needs were assessed and immigration procedures began.

9. Trusted adult

It is important that children can trust the police. We saw that, in some child protection cases, officers consider carefully how best to approach a child and/or their parents or carers, and explore the most effective ways to communicate with them. Such sensitivity builds confidence and creates stronger relationships between the child and/or the parents or carers and the police.

The workforce doesn't sufficiently understand the importance of capturing the 'voice of the child'

The right of a child to be heard is included in the [UN Convention of Rights](#). The [Children Act 2004](#) emphasises the importance of speaking to the child or young person as part of any assessment. Gathering children's views, their wishes, thoughts and feelings has been consistently highlighted in lessons learned from serious case reviews. Capturing the voice of the child refers not only to what children say directly: it also means understanding their experiences from their point of view. When children feel listened to, plans are more successful because they have been involved and better safeguarding decisions are made for them.

Senior leaders take personal responsibility for emphasising to the workforce the importance of capturing the voices of children. Even so, we found that this message hadn't got through to staff and managers. In virtually every department we visited, they didn't know enough about the voice of the child. This finding was reinforced in our case audits and in the focus groups that we held. More needs to be done to explain and embed a change in the force's approach to children.

The force works well with partner organisations, such as the local authority, BTP and the Border Agency, to protect children when they need immediate safeguarding. This was seen in the response when children visiting the city – with their families or on school trips – were reported as missing, or when they were found to be committing acquisitive crime such as theft. In most of these cases, officers prioritised the welfare of the child, taking swift action to protect them and to make appropriate safeguarding referrals.

The vast majority of the 1,500 children living in the City of London aren't educated in the five schools and five nurseries located in the area. Instead, they mostly travel to schools in surrounding areas of London. Conversely, schools in the city are selective, with their 2,250 pupils travelling into the area. The force has signed up to Operation Encompass, requiring it to notify the local authority and school of a child affected by domestic abuse. However, at the time of the inspection, no referrals had been made to schools using this protocol.

The force currently has very limited capability to interact with its school community. At the time of the inspection, the force's schools liaison officer and PCSO deputy were unavailable to work with schools because of illness. The communities and partnership team hadn't planned to cover this gap. This means that referrals to and from schools are less likely to be made. In addition, county lines and criminal exploitation may go unaddressed and intelligence-gathering opportunities to tackle risk from extremism, child abuse, gangs, drugs and substance abuse, and grooming to reduce child vulnerability may be lost. The force is currently insufficiently focused on tackling risks to schoolchildren and the potential opportunities to reduce vulnerability by engaging closely with schools.

10. Managing those who pose a risk to children

There are good ratios of trained staff

The PPU deals with the management of sex offenders and violent offenders (MOSOVO), and managers in the unit support multi-agency public protection arrangements (MAPPA). The force has a clear rationale for the PPU combining the responsibilities of managing those considered to be high-risk offenders alongside supporting those people who are potentially most vulnerable.

Two fully trained PPU officers, supported by another colleague, are responsible for offender management. They are accredited MOSOVO officers and use specialist offender management systems: ARMS, a structured assessment process to assess dynamic risk factors, and ViSOR, a national database for managing offenders. Both PPU sergeants and the detective inspector are also trained. One of the sergeants is the central point of contact for both MOSOVO and ViSOR. Coupled with SCAIDP training, this should mean that a highly skilled capability is able to deal with both offending risks and breaches of licence, and also with safeguarding and multi-agency referrals.

The force currently has eight (a very low number) of RSOs, of whom one is in prison serving a long sentence and three others have been deported. One of the remaining four is medium risk and the other three are low risk.

Low numbers of RSOs means that it is possible to provide frequent good-quality intelligence to the wider workforce. The quality of information flowing should allow the force to have confidence in its management of this risk. We saw that each RSO had a MOSOVO master log, which flags status and mirrors activity in ViSOR records. This was highly effective practice because it meant that all the workforce could see the information on current risks.

Public protection unit offender management is inadequate

With such a small number of active cases, case management should be excellent at the lower end of risk. But we found that the management and supervision of RSO cases was very poor. Two cases hadn't had an ARMS risk assessment completed (50 percent of RSOs). In another case, a good-quality assessment hadn't been entered on ViSOR but remained on paper in the PPU office for three months after completion.

Supervisory oversight was inadequate with only a single sergeant aware of detail for each RSO. The inspector wasn't involved with risk assessment activity and there was no force supervisory oversight beyond the PPU, for example, by this work being

included in performance meetings. The force wasn't routinely collecting data about timeliness of ARMS assessments, visits, offences committed or breaches of licence or registration conditions.

The small number of RSOs means that the PPU team is trained, but its lack of activity showed that this area is marginal to its core focus. The potential risk posed by these offenders isn't sufficiently assessed and managed by the force. For example, visits to check and assess the home address when an RSO has initially registered or recently moved aren't always carried out in a timely way. We saw a record where a home address visit hadn't taken place for five months. This meant that essential investigative activity wasn't pursued, nor documented by the offender managers, which would challenge RSOs' accounts of where they lived and spent their time, as well as providing details of their computer usage (contrary to prohibitions).

Case study: ineffective supervision doesn't rectify inadequate offender management

An RSO was transferred by another force to City of London Police following his conviction for making indecent images of children. The initial reception was good. A master log was created for updates to be accessible to all force employees and the RSO was flagged on force systems as a risk to children.

Subsequent offender management by the PPU meant that the RSO wasn't seen until six months after the transfer and then only during an appointment at a police station. A home visit was delayed for a further two months and, following his move to a new address two months prior to our inspection, a visit had still not taken place.

There was information suggesting that the RSO had access to his partner's phones and computers but no record to show that these had been checked, although there was information that he was continuing to access the internet. The structured ARMS risk assessment hadn't been updated by the offender manager and intelligence hadn't been updated on police systems to inform officers beyond the PPU of the current risk posed by the RSO.

The low numbers of RSOs in the force area should allow it to have a more effective level of management than we found during our inspection. In the circumstances and with the existing resources available, we believe that the force can very quickly address the problems we have identified.

Recommendation

We recommend that City of London Police should immediately review the management arrangements for sex offenders and violent offenders in its public protection unit, including its supervision and management processes, so that it is satisfied that the unit is fully effective within its terms of reference. The aims should achieve:

- the timely completion and update of risk management plans;
- timely and unannounced home visits being made to registered sex offenders; and
- timely recording of intelligence on force systems.

11. Police detention

Numbers of children arrested in the force area are very low, but they are being recognised as being highly vulnerable and treated appropriately

Many children suspected of committing criminal offences have complex needs and are likely to be vulnerable and in need of safeguarding support. City of London Police has been successful in reducing the number of children arrested and brought into police detention.

The force practice of a superintendent checking on the welfare of children while in custody demonstrates good leadership. It reinforces the position that children involved in crime are vulnerable and must be treated accordingly, rather than the focus being solely on investigating offences. This positive interest can also demonstrate to children while they are in custody that someone senior in authority is interested in them as individuals and can help them. However, the force could do more to promote this initiative so that its workforce better understands its purpose.

While children are in custody, they are always seen by a healthcare professional who will assess each individual and notify police custody staff of any vulnerabilities or concerns about risk. Girls are assigned a female member of staff to support them. The custody record documents any concerns about the welfare of the child. Officers consistently record details of the circumstances and vulnerabilities of every detained child on a PPN. These are reviewed by the PPU and referred to CSC. However, the PPU's operational hours can mean that recognising wider risks to children and acting to safeguard them can be delayed or opportunities missed. A child with a PPN may have left custody before PPU staff or CSC partners are notified. These wider risks may be complex, such as those associated with criminal exploitation, modern-day slavery and trafficking, which may be apparent only after intelligence research and analysis.

Inspectors make timely reviews of the need to continue to detain children and will speak with a child as part of their review. If children are asleep, they are informed of the review at the earliest opportunity. However, we saw in some of the custody records that lengthy delays in custody before children were interviewed weren't noted or explained.

The force reviews all cases of children in custody

The custody management team dip-samples 20 percent of all custody records, including five child custody cases each month, and gives feedback to individuals and the wider workforce on issues and themes. Because numbers of children coming into police custody in the City of London are very low, this means that they review between 50 percent and 100 percent of the children's cases each month. The dip-sample includes areas for development raised in a recent thematic custody inspection and any Police and Criminal Evidence Act compliance issues that may arise.

Staff involved in custody office duties receive regular training and all have completed the CoP's vulnerability training course. There is weekly CPD training for custody staff and the focus is often on vulnerability. On 3 December 2019, for example, the focus was on domestic abuse. Other subjects have included 'lessons learned' and the difference between secure and local authority accommodation. The training offered means that, despite the officers and staff having infrequent dealings with child protection, they feel equipped to do so when needed.

High-risk or critical issues affecting custody are raised in the daily management meeting by the response team inspector.

Timely support for children in custody isn't always provided

A daily review of children in custody is completed and compliance issues, such as the attendance of AAs are included. We saw inconsistency, with some long delays before AAs attended, and children were sometimes given rights and entitlements and charged with no AA present. AAs didn't usually attend the custody suite after midnight so any children arrested during the night would be unlikely to receive appropriate support until later in the morning.

We saw a case where a child was strip-searched and then held in custody for an extended period without access to an AA to advocate for their welfare. Based on our review of custody records and speaking with custody staff, we considered the current level of AA provision was insufficient to meet the needs of detained children. CSC managers told us that they were working closely with the force to improve the levels of AA provision. This approach is welcome, but police leaders should ensure that it is expedited so that children receive the support they need without delay.

There are no juvenile detention rooms, so children must always be held in adult cells. However, the force only holds children in custody when necessary to investigate serious offences, and it takes seriously its duty to actively promote the welfare of children and do whatever is possible to support them and reduce trauma. For example, family members were allowed to stay with children in their cells or in other areas of the custody suite, and girls were assigned a female officer to care for their needs, in line with the Children and Young Person's Act 1933. Custody sergeants recognised the importance of keeping children away from adult detainees when booking them into custody, and of placing them in cells near to the booking-in area.

Liaison and diversion services (a screening process for people of all ages in contact with the youth and criminal justice systems) aren't fully embedded in the custody suite. We were told that their hours are limited by the current contract. This means that

specialist professionals may not always see a child in detention to assess them and refer them for non-criminal justice agency support. Staff don't always understand the process of requesting alternative accommodation from the local authority rather than secure accommodation or continued police custody prior to court. In two cases, we saw requests made where the criteria for secure accommodation weren't met. However, it was positive that juvenile detention certificates were appended to most of the cases we saw.

Case study: complex vulnerability and risk insufficiently addressed by force action

Two 17-year-old children from eastern Europe were arrested for distraction thefts. Their initial accounts were inconsistent because they claimed not to know each other prior to arrest. One said that he was stealing to buy clothes. One of them claimed to be on holiday and staying with a grandparent for a week but that he would be moving on to an unknown address. Both were upset and crying and described as unkempt.

Officers completed a referral form to children's social care including concerns that the children may be criminally exploited or trafficked. The referral requested support and help to divert the children from criminal activity, but it failed to prompt immediate activity by police and safeguarding partners to mitigate the children's vulnerability. This could have included a police request to the local authority for a strategy meeting and appropriate accommodation.

Instead, the children were charged with offences and taken to court. After the court hearing, both children were released and their whereabouts at the time of our inspection was unknown.

Recommendation

We recommend that, within three months, City of London Police should introduce improvements to the arrangements for the attendance of appropriate adults, so that these are timely and sufficient to support children while they are in police detention.

Conclusion

The overall effectiveness of the force and its response to children who need help and protection

Senior police leaders are highly committed to making the City of London a safe place for children to visit and live.

The force has established, and continues to invest resources in, its specialist PPU. Dedicated specialist staff investigate complex crime, support vulnerable children and tackle high-risk offenders. PPU staff also manage sharing information with other agencies to protect and promote the welfare of children.

The initial response to calls and incidents where child protection featured was robust and the force prioritised this activity and gave support to responding officers with timely intelligence.

However, during our inspection, we saw that not all arrangements and processes were completely effective for children who needed help and protection.

This meant that:

- the voice of the child wasn't captured by significant numbers of the workforce;
- strategy discussions weren't always held and, when they were, records weren't always made;
- there were some significant delays in assessing child protection concerns and cumulative or emerging risk, such as that of exploitation, wasn't identified;
- investigations weren't consistently supervised: there were delays and ineffective case management;
- arrangements to tackle online child abuse and identify those who download and distribute indecent images of children were ineffective;
- some children were held in police detention for long periods without support from AAs; and
- potential threats to children from RSOs were inconsistently managed.

It was clear from talking to staff that the workforce is committed and dedicated. They told us that they had received vulnerability training, but significant numbers of officers and staff were unaware of the importance of listening to the voice of the child. Some of them told us that they had heard the expression but its meaning for their roles hadn't been sufficiently explained.

The force engages well with statutory safeguarding partners and works with other agencies to address vulnerability. It recognises the importance of engaging with strategic London-wide arrangements because many of the children it acts to protect live elsewhere. The unique circumstances of the City of London – its small geographical area, the population demographics and the relative affluence – means that the response and demand regarding vulnerable children is different from that of other forces. We saw some evidence of highly effective practice but also other aspects where we were very concerned about the quality of the force's level of service.

Senior leaders know that there are inconsistencies and areas that require improvement. We welcome the response of the force, based upon its engagement with us and its willingness to act quickly to address areas of concern we identified through the child protection case audits carried out during this inspection.

Our recommendations aim to help the force make sustainable improvements in these areas.

Recommendations

Immediately

We recommend that City of London Police should review the vulnerability training for its staff in all roles, to improve the understanding of the importance of engaging with children and in understanding their perspectives to improve safeguarding activities that deliver better outcomes for those children.

We recommend that City of London Police should act to improve child protection investigations by ensuring that:

- there is effective supervision;
- timely referral and strategy discussions take place; and
- body-worn video is accessible to all investigators.

We recommend that City of London Police should review the management arrangements for sex offenders and violent offenders in its public protection unit, including its supervision and management processes, so that it is satisfied that the unit is fully effective within its terms of reference. The aims should achieve:

- the timely completion and update of risk management plans;
- timely and unannounced home visits being made to registered sex offenders; and
- timely recording of intelligence on force systems.

Within three months

We recommend that City of London Police should review its systems and practice to ensure that:

- warning markers and flags are in place to alert responders to risk and vulnerability; and
- effective systems are in place to assist control room staff to prompt frontline responders to follow force policy – for example, to turn on body-worn video when attending domestic abuse incidents.

We recommend that City of London Police should act to improve child protection investigations by reviewing its systems for investigating online child abuse and establishing effective arrangements to identify and prosecute those who download and distribute indecent images of children in its area.

We recommend that City of London Police should introduce improvements to the arrangements for the attendance of appropriate adults, so that these are timely and sufficient to support children in police detention.

Next steps

Within six weeks of the publication of this report, HMICFRS requires an update of the action the City of London Police has taken to respond to the recommendations that we have asked to be acted on immediately.

City of London Police should also provide an action plan within six weeks of the publication of this report specifying how it intends to respond to our other recommendations.

Subject to the update and action plan received, we will revisit the force no later than six months after the publication of this report to assess how it is managing the implementation of all the recommendations.

Annex A – Child protection inspection methodology

Objectives

The objectives of the inspection are:

- to assess how effectively police forces safeguard children at risk;
- to make recommendations to police forces for improving child protection practice;
- to highlight effective practice in child protection work; and
- to drive improvements in forces' child protection practices.

The expectations of organisations are set out in the statutory guidance [*Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children*](#). The specific police roles set out in the guidance are:

- the identification of children who might be at risk from abuse and neglect;
- investigation of alleged offences against children;
- inter-agency working and information-sharing to protect children; and
- the exercise of emergency powers to protect children.

These areas of practice are the focus of the inspection.

Inspection approach

Inspections focus on the experience of, and outcomes for, children following their journey through the child protection and criminal investigation processes. They assess how well the police service has helped and protected children and investigated alleged criminal acts, taking account of, but not measuring compliance with, policies and guidance.

The inspections consider how the arrangements for protecting children, and the leadership and management of the police service, contribute to and support effective practice on the ground. The team considers how well management responsibilities for child protection, as set out in the statutory guidance, have been met.

Methods

- Self-assessment of practice, and of management and leadership.
- Case inspections.
- Discussions with officers and staff from within the police and from other organisations.

- Examination of reports on significant case reviews or other serious cases.
- Examination of service statistics, reports, policies and other relevant written materials.

The purpose of the self-assessment is to:

- raise awareness in the service about the strengths and weaknesses of current practice (this forms the basis for discussions with HMICFRS); and
- initiate future service improvements and establish a baseline against which to measure progress.

Self-assessment and case inspection

In consultation with police services the following areas of practice have been identified for scrutiny:

- domestic abuse;
- incidents in which police officers and staff identify children who are in need of help and protection – for example, children being neglected;
- information-sharing and discussions about children who are potentially at risk of harm;
- the exercising of powers of police protection under section 46 of the Children Act 1989 (taking children into a 'place of safety');
- the completion of section 47 Children Act 1989 enquiries, including both those of a criminal nature and those of a non-criminal nature (section 47 enquiries are those relating to a child 'in need' rather than 'at risk');
- sex offender management;
- the management of missing children;
- child sexual exploitation; and
- the detention of children in police custody.

Annex B – Definitions and interpretations

In this report, the following words, phrases and expressions in the left-hand column have the meanings assigned to them in the right-hand column. Sometimes, the definition will be followed by a fuller explanation of the matter in question, with references to sources and other material which may be of assistance to the reader.

Term	Meaning
adverse childhood experiences (ACEs)	stressful or traumatic experiences that can have a huge impact on children and young people throughout their lives. The ten widely recognised ACEs are: Abuse: physical-sexual-verbal; Neglect: emotional-physical; Growing up in a household where: there are adults with alcohol and drug use problems, there are adults with mental health problems, there is domestic violence, there are adults who have spent time in prison, parents have separated. There are also a range of other types of childhood adversity that can have similar negative long-term effects. These include bereavement, bullying, poverty and community adversities such as living in a deprived area, neighbourhood violence etc.
appropriate adult (AA)	a parent, guardian, social worker, or any responsible person over 18 years old, and who is not a police officer, or a person employed by the police. AAs must be called whenever they detain or interview a child. An AA must be present during a range of police processes, including intimate searches and identification procedures, to safeguard the interests of children detained or questioned by police officers.
child	person under the age of 18 years
child abduction warning notice	non-statutory notice issued when the police become aware of a child spending time with an adult who they believe could be harmful to them; a notice is used to disrupt the adult's association with the child, as well as warning the adult that the association could result in arrest and prosecution

Term	Meaning
multi-agency public protection arrangements (MAPPA)	mechanism through which local criminal justice agencies (police, prison and probation trusts) and other bodies dealing with offenders work together in partnership to protect the public from serious harm by managing sexual and violent offenders; established in each of the 42 criminal justice areas in England and Wales by sections 325 to 327B of the Criminal Justice Act 2003
multi-agency risk assessment conference (MARAC)	locally-held meeting of statutory and voluntary agency representatives to share information about high-risk victims of domestic abuse; any agency can refer an adult or child whom they believe to be at high risk of harm; the aim of the meeting is to produce a co-ordinated action plan to increase an adult or child's safety, health and wellbeing; agencies that attend vary, but are likely to include the police, probation, children's, health and housing services; over 250 currently in operation throughout England and Wales
multi-agency safeguarding hub (MASH)	working location in which public sector organisations with responsibilities for the safety of vulnerable people collaborate; it has staff from organisations such as the police and local authority social services, who work alongside one another, sharing information and co-ordinating activities, to help protect the most vulnerable children and adults from harm, neglect and abuse
Office for Standards in Education, Children's Services and Skills (Ofsted)	non-ministerial department, independent of government, that regulates and inspects schools, colleges, work-based learning and skills training, adult and community learning, education and training in prisons and other secure establishments, and the Children and Family Court Advisory Support Service; assesses children's services in local areas, and inspects services for looked-after children, safeguarding and child protection; reports directly to Parliament
police and crime commissioner (PCC)	elected entity for a police area; responsible for securing the maintenance of the police force for that area and securing that the police force is efficient and effective; holds the relevant chief constable to account for the policing of the area; establishes the budget and police and crime plan for the police force; appoints and may, after due process, remove the chief constable from office; established under section 1, Police Reform and Social Responsibility Act 2011

Term	Meaning
registered sex offender (RSO)	person convicted or cautioned for a sexual offence as set out in Schedule 3 to the Sexual Offences Act 2003, or who has otherwise triggered the notification requirements (for example, by being made subject to a sexual offences prevention order), who is required to provide personal details to the police, including details about movements (for example, if going abroad) and, if homeless, where they can be found; registered details may be accessed by the police, probation and prison service

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