
BEV HUGHES

**DEPUTY MAYOR
OF GREATER
MANCHESTER**

Rt Hon Priti Patel MP
Secretary of State for the Home Department
2 Marsham Street
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23rd April 2020

Dear Home Secretary

SUBJECT: HMICFRS National Child Protection Inspection

I write in relation to the recent HMICFRS National Child Protection report, the second in a series of such inspections.

The inspection reviewed how the police service is structured, led and governed, in relation to child protection services, including interactions with or for children and the treatment of children in police custody.

I welcome the focus of HMICFRS on this very important area of practice. However, effective safeguarding of children depends fundamentally on the strength, efficiency and effectiveness of local partnership working across police, health, children's social care in particular, as well as voluntary sector organisations. Whilst I realise this is not in the gift of HMICFRS alone, the instigation of integrated inspections by all the relevant inspection agencies acting together is long overdue. The full picture of effective safeguarding in localities cannot be assessed by individual inspections of different agencies separately and at different times. It would be helpful if HMICFRS began to make the case for this change.

With specific reference to this HMICFRS inspection, I am pleased that the report highlights some effective practice within the police service when managing child protection matters. The unambiguous commitment from police leaders, officers and staff to the protection of children is clear, and in Greater Manchester we are committed to protecting vulnerable children - this remains a key priority.

The report also found overall improvements across the police service in the identification of vulnerability and assessment of risk. The maturing relationships and processes with partners has also improved, providing for enhanced and more meaningful interactions and outcomes received by children at risk.

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Whilst the report notes welcome improvements I believe a key theme contained within it is a concern that in general, the police and their partners continue to be too reactive, with decision making often based on the most recent incident involving a child and the emphasis too often placed on the management of demand as opposed to the reduction of risk.

Inspectors assert that too little emphasis is placed on identifying underlying issues or the cumulative impact on a child of repeated incidents of trauma. In short, Inspectors state that even with additional resources the police cannot hope to address the current and future levels of demand in ways which they have attempted to hitherto, and that a new model is required that considers root causes of vulnerability and which takes action to address this. I and Greater Manchester Police (GMP) recognise this and can point to developments in this regard but I also recognise that there is much more to do. I will comment on this further when considering the Inspector's recommendations below.

There is however an important point to be made when considering the development of radical new models. HMICFRS in recent years have consistently referred to the police as a service under severe strain and stress and they do so again in this report. This is important as a service under strain and stress in dealing with current demand will face clear challenges in garnering the capacity to continue to reform and develop new ways of working. Local authorities and other public agencies face a similar context. That is not to say that this cannot be done, rather that clear leadership and commitment is required. I intend to continue to play my part in supporting and challenging GMP to continue to adapt, as I recognise this is a clear requirement to ensure that all of our children have the best prospect of being kept safe and thus prosper and fulfil their true potential.

Whilst Greater Manchester was not one of the areas visited as part of the fieldwork for this inspection, the report makes a number of recommendations for Chief Constables. I can respond to these as follows and also wish to make comment in respect of the recommendation specifically for the Home Office:

HMICFRS Recommendation – We recommend that the Home Office jointly with other government departments considers the development of a new national early help and prevention strategy to more effectively address the root causes of harm for vulnerable children. The purpose of such a strategy should be to ensure that agencies work together as part of a coherent whole system approach to recognise and respond to the earliest indicators of risk and vulnerability in order to prevent escalating and cumulative trauma.

Based on work that has been going on in Greater Manchester for a number of years as part of our public service reform programme, the Mayor launched the Greater Manchester Model (unified public services for the people of Greater Manchester) in July last year. The model is a collaboration and commitment by local authorities, police, health services and other public sector organisations as well as the voluntary and community sector. The case for change made by the Mayor directly mirrors some of those raised by HMICFRS. It is about workers from all agencies working closely together, often co-located in neighbourhoods taking a whole system approach to provide early help to tackle all forms of vulnerability. We have invested heavily in pilots that show this to be the right approach and crucially our model focuses heavily on working with individuals and communities to tackle the root causes of issues, as opposed to simply providing a highly regulated and untailored service.

Child protection, vulnerability and trauma is clearly a crucial issue for us all to address but it has to be remembered that most harm to children is caused by adults who themselves are likely to have issues that need addressing. Some issues must and can only be addressed by the

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criminal justice system but many can and should be addressed in other ways. We know for example that domestic abuse is a significant issue that affects the life chances of all those exposed to it. We believe that this model, in conjunction with others such as complex safeguarding arrangements, not only provides an opportunity to directly enhance the protection of children, but also to more effectively address other issues that cause vulnerability to adults and more widely in communities that themselves have an adverse effect on children.

I recognise that there remains much to do to ensure our Model is consistently implemented and delivered across Greater Manchester. With the Mayor and other local leaders I will continue to play my part in assisting and supporting public agencies make this happen.

HMICFRS Recommendation - We recommend that chief constables take steps to reduce the unnecessary criminalisation of children. Such steps could include (but don't need to be limited to) considering fully a child's circumstances when making decisions; more effective use of legislation to discontinue prosecutions not in the public (or child's) interest; the development of more effective non-criminal justice pathways for vulnerable children who commit lower level crimes.

In Greater Manchester the police service has adopted the National Police Chief's Council (NPCC) guidance around Child Centred Policing to good effect. To enhance this approach further GMP will shortly appoint a senior leader as Child Centred Policing Lead. The number of arrests of children and young people are low compared to the overall number of arrests made annually. As a result of Greater Manchester Police's Crime Screening Policy, very few low level crimes committed by children result in investigations and Restorative Justice approaches are used extensively.

GMP is currently exploring a new Crime Allocation Policy to focus on allocating crime based on the level of risk and complexity rather than solely on the crime category. This policy will consider situations where a child is a victim or a suspect, and would involve every crime being reviewed by a Child Protection Specialist to ensure that all safeguarding measures are addressed. The policy is currently being trialled and I will continue to monitor the developments and outcomes of this.

In relation to police custody, protocols are in place around children being detained overnight to ensure that secure local authority accommodation can be found or that bail is considered. In addition, plans are being developed to conduct a joint public protection and custody review to test and measure performance where children are arrested and taken into custody, or dealt with by the Voluntary Attendance process.

It is also important to understand the potential complexity surrounding crimes committed by children. Recognising the links between organised crime and safeguarding of children is important. Multi-agency organised crime teams and child safeguarding teams have and are being brought together as Complex Safeguarding Teams. These teams will deal with child sexual exploitation, criminal exploitation and modern slavery offences, amongst others. They review on a daily basis children who have been arrested or attended the police station. The purpose of this is to identify children who may well be victims of exploitation as opposed to simply committing criminal acts. The Complex Safeguarding Team will then further explore this with the child concerned. I am pleased that we are seeing more cases of children being treated as victims, where in the past they would have been treated as a suspect and processed through the criminal justice system. In such cases safeguarding of the child has been the priority and several prosecutions have been continued against adults who have exploited them and are in effect organised criminals.

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Despite these positive developments I remain concerned, as the inspection report alludes to, that more is required of us to intervene earlier when young people come to the attention of the police. In particular, closer attention is required when children first come to the notice of police criminally, that the effectiveness of out of court disposals is effectively monitored and that a problem solving approach takes place from the outset. Recent qualitative research within Greater Manchester, led by our Serious Violence Reduction Unit reaffirms some of the findings of the inspection relevant to this recommendation.

Youth Justice Transformation is a key priority for myself and Greater Manchester and I intend to exploit fully the opportunities presented by devolution and in particular the Justice Devolution Memorandum of Understanding between the Greater Manchester Combined Authority (GMCA) and the Ministry of Justice. This work will be led by a Youth Justice Steering Group led by one of our Directors of Children's Services, which will report directly to me as chair of our Justice and Rehabilitation Executive. I recently hosted a Youth Justice Round Table event with key stakeholders, focused on the research to which I refer. There was broad agreement for the radical reform of the youth justice landscape, in particular recognising that young people are not engaged with statutory youth justice services until and unless they are charged with an offence. We are determined to fill this gap to prevent the criminalisation of children and maximise their life chances, which at the same time will provide greater protection to our communities. Whilst the current Covid-19 situation presents obvious challenges, I am determined that this work move forward at pace.

Finally, I am leading the development of a comprehensive gender based abuse strategy that specifically recognises the terrible effects of domestic abuse on children, which can in some cases translate into harmful behaviour putting them at risk of exploitation and/or criminal behaviour. The strategy will specifically recognise the concept of Adverse Childhood Experiences and aim to counter children's exposure to them.

HMICFRS Recommendation - We recommend that chief constables should review performance management and quality assurance approaches to ensure that assessments of the nature and quality of decision making are routinely made. The purpose of this would be to reinforce the understanding that compliance with policy or process is only one part of effective practice.

AND

HMICFRS Recommendation - We recommend that chief constables on those forces not yet inspected by the NCPI or JTAI take steps to identify and implement good practice and the learning highlighted from these programmes. This may include engaging with those forces who have been inspected, direct contact with the HMICFRS child protection lead or participating in a regional or national learning event.

Greater Manchester Police was last subject of a HMICFRS Child Protection Inspection in 2014, with a follow up visit in 2015. Following the more recent child protection inspections taking place in other North West policing areas in 2018, GMP has worked closely with those areas to understand the issues identified. As a result of this collaborative working, GMP introduced its own Child Protection Benchmarking and Audit process in 2019.

This audit process examines the approach taken to child protection reports, and examines the quality of decision making throughout the investigation, from initial report to finalisation. Following this audit process each local policing district completed a detailed benchmarking

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assessment to gauge performance against 18 core themes including; quality of child protection investigations, effective governance, quality of decisions made at incidents where children are at risk or vulnerable, and quality of welfare checks and risk assessments. Each district then compiled an action plan to address areas for improvement and further development, with updates feeding into a central strategic action plan. The Benchmarking Assessments and subsequent action plans are overseen by an Assistant Chief Constable and are designed to be living documents that are continuously reviewed and updated.

The North West regional forces are now looking to introduce a series of regional learning events, where performance in each area is subject of an independent peer review by colleagues from a neighbouring area, so that each the police service can share learning and good practice. The Crown Prosecution Service have also agreed to participate in these learning events.

A new Vulnerability Performance Framework is also being developed, that along with other areas of vulnerability, will help to understand better the performance relating to child protection matters.

Yours sincerely



Baroness Beverley Hughes
Deputy Mayor of Greater Manchester
Policing, Crime and Criminal Justice