

# **National Child Protection Inspection Post-Inspection Review**

**City of London Police  
6–10 December 2021**

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# Introduction

## Our 2019 inspection

In December 2019, Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) inspected how well City of London Police keeps children safe.

In July 2020, we published our findings. We reported that the force was highly committed to protecting vulnerable people, including children. [Senior officers](#) held regular governance and oversight meetings.

A [public protection unit \(PPU\)](#) operated as a central resource to deal with incidents and crimes affecting vulnerable people and children. The PPU had a good working relationship with the other agencies that formed the City of London safeguarding partnership. The force understood the challenges of working with agencies across the Greater London area. 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 to help vulnerable children. But 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. Even in the specialist PPU, vulnerability and risk weren't recognised consistently.

The force was 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 registered sex offenders wasn't robust enough.

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 included:

- 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 they may be criminally exploited;
- ensuring that flags and markers are used effectively on force systems to alert the workforce to risk and vulnerability;

- providing 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](#) for children in police detention;
- effectively supervising offenders in the community; and
- providing a robust and consistent approach to dealing with [intelligence](#) about online offending and those who distribute indecent images of children.

We made six recommendations intended to help the force improve its response to safeguarding children.

## The 2021 post-inspection review

In December 2021, we carried out a post-inspection review.

### Methodology for the revisit and the effect of COVID-19

We adapted our inspection because of the COVID-19 pandemic. We agreed arrangements with the force for a safe and effective inspection, working within national guidelines that were in place at the time.

During this inspection we:

- examined force policies, strategies and other documents;
- interviewed senior leaders, managers and supervisors;
- held focus groups with frontline staff; and
- audited 26 child protection incidents/investigations. Of these, we found 9 cases to be good, 14 required improvement and 3 were inadequate.

### Summary of findings from the post-inspection review

City of London Police has acted to address some of the concerns we raised in 2019.

The force is training its workforce to recognise vulnerability and to speak to children. Although this was delayed by COVID-19, training programmes are now underway and are well attended. But the benefits are yet to be seen in consistently improved responses to vulnerable children.

The force has improved the way it manages registered sex offenders. Officers carry out assessments and record them on the appropriate systems. The assessments are well supervised. But officers still need to improve their risk management plans for sexual and violent offenders.

Healthcare professionals see every child held in police detention. Custody staff refer detained children to children's social care (CSC) services. But we saw delays in appropriate adults arriving to support detained children.

PPU staff investigate child protection cases effectively. The investigations take place within a reasonable time, are well planned, and include evidence from [body-worn cameras](#). PPU supervisors make timely referrals and hold strategy discussions to keep up the progress of investigations.

We found the staff and supervisors in the PPU to be highly motivated and dedicated to their work. But staffing levels are low, particularly in specialist supervisory roles. This means that the unit relies on a few key people and is not resilient when they are unavailable. The lack of resilience could result in service failures as staff outside the PPU are not trained or experienced enough for this work.

Although City of London Police has low volumes of reported child abuse and vulnerability crime, the PPU has very wide terms of reference. It is responsible for almost all types of crime against children and vulnerable adults, including serious sexual offences and management of sexual offenders, as well as exploitation, modern slavery and [missing persons](#).

Many of these crimes are complex and technical and take longer to investigate, with high demand for victim support. The PPU also helps colleagues who want advice on safeguarding and handles all referrals to other safeguarding agencies.

A review of the PPU's terms of reference might help force leaders to achieve a better balance between the unit's capability and the risks and demands it faces.

The force hasn't changed its [control room](#) systems enough to make sure warning markers alert officers quickly when children are at risk. This is partly because some of these systems are due to be updated and replaced. One system – computer aided despatch (CAD) – is owned by the Metropolitan Police Service, so the force can't place its own markers and flags on it.

The approach to online child abuse hasn't improved. Managers and staff still don't understand the priority is to identify offenders quickly and make sure that children are safe. The force needs to improve its systems and processes for tackling online child abuse.

## **Conclusion**

We are encouraged to see City of London Police has acted to address most of the recommendations from our 2019 inspection.

The force has improved the way officers investigate child abuse, how they manage sex offenders and how they treat children in detention. Supervision is effective and access to multi-agency support for children is well co-ordinated and prompt.

The force is working to improve the quality of its performance management information. This will help leaders to understand how effective the service is in responding to vulnerable people and children.

The force still needs to act to:

- make sure all its staff are trained to recognise vulnerability and protect children;
- improve control room systems so frontline responders get the information and support they need to deal with risk and reduce vulnerability;
- make sure officers have the capability to respond to all forms of online child abuse and reduce the risk to children;
- improve the quality of its MOSOVO risk management plans; and
- make sure appropriate adults arrive in time to support detained children.

# Leadership, management and governance

## Recommendation from the 2019 inspection report

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.

## Summary of post-inspection review findings

City of London police has developed training programmes to help its workforce understand what to do to safeguard children.

Leaders receive some updates about how the force responds to incidents and overall performance. But they need better information to get a clearer picture of how staff engage with children so they can continue to improve their responses.

## Detailed post-inspection review findings

### **The force has training programmes to help its workforce recognise when children are vulnerable and at risk**

Mandatory one-day vulnerability training started in September 2021 for all ranks up to and including inspectors. This training is about seeing the risks to children and understanding the voice of the child.

The head of learning told us that 244 staff had been trained and 151 were due to have started on courses by mid-February 2022. While this is positive, we think that senior leaders would also benefit from this training.

As well as the mandatory one-day training, the force has asked charities working in this area to provide specialist training. One charity has trained 136 frontline and investigation staff to understand and communicate with children.

The force also offers online vulnerability training through College Learn, formerly the [National Centre for Applied Learning Technologies \(NCALT\)](#). A recent training course on [domestic abuse](#) included a focus on vulnerable children.

Specialist PPU staff have helped to teach colleagues throughout the force about subjects such as completing police protection notices (PPNs), the voice of the child, and the impact of [adverse childhood experiences](#).

Officers also receive intranet updates on subjects such as the voice of the child.

We spoke to frontline staff in various roles who knew about the importance of speaking to children and recording their concerns on PPNs. Response team officers told us they had training days included in their shift pattern.

But the force isn't evaluating its training well enough. For example, it doesn't know which staff have completed the College Learn training or which staff have received the force's own 'focus on series' themed training.

This means that it doesn't know if the training is improving its safeguarding of children. The staff we spoke to had mixed feelings about the quality of the training. Some praised it highly, but others thought it wasn't effective.

### **Performance is evaluated but children aren't always getting an improved response**

The City of London Police regularly evaluates sample cases. Its crime scrutiny group, made up of officers from different teams within the force, audits case records in areas such as child protection, voice of the child, domestic abuse, stalking and [harassment](#) and hate crime.

The learning from these case reviews informs the force's action plan and is shared in staff briefings on the intranet. Staff are required to keep up to date with these briefings to help them improve their effectiveness.

PPU supervisors review every PPN to check that the quality of the information recorded in each notice meets standards. If it doesn't, they give feedback directly to the officers who completed them.

This helps the force to improve the quality of the information on police records and make better referrals to CSC services for vulnerable children. It also helps the PPU to spot concerns and training gaps and report them to the crime scrutiny group.

Officers from different parts of the force told us that the general workforce lacks knowledge and understanding of child protection subjects. These include child exploitation, sexual exploitation, trafficking and [peer-to-peer](#) sharing of indecent images. Because of this, they rely heavily on the PPU to take responsibility for safeguarding, investigate crimes and provide guidance.

But the PPU is understaffed and only operates limited core hours between Monday and Friday. This reduces the force's ability to respond and investigate quickly when a case is first reported.

We reviewed five domestic abuse cases which affected children. We were particularly looking for how well officers understood the importance of speaking to children, what information to record, and what action to take to safeguard children.

In one case we found a good response. But in the other four cases we assessed, officers needed to improve how they speak to children and check on their welfare. The information they recorded wasn't enough to help partner agencies understand what needed to be done to help these children.

# Initial contact

## Recommendations from the 2019 inspection report

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.

## Summary of post-inspection review findings

The force's control room systems still don't have enough information to alert officers about risk and vulnerability. There is information on some children who are at risk of harm. But there are no warning markers and flags for other risks, such as the addresses of registered sex offenders living in the area.

Control room staff have checklists to help them support frontline responders where there is risk and vulnerability. They remind officers going to domestic abuse incidents to turn on body-worn video cameras to record what victims and children say.

Control room staff don't get the training they need.

The force doesn't know how well it is responding to vulnerability and risk because it doesn't routinely check officers' work or the end results of their actions.

## Detailed post-inspection review findings

### Control room systems can't use vulnerability and risk warning markers to alert responders

Markers and flags should be added to force systems to alert officers to important information about vulnerability and risk. These might include:

- homes where a child is on a child protection plan;
- homes where there is a risk of domestic violence; or
- the address of a registered sex offender in the local area.

Markers help police forces to protect vulnerable people, reduce the risk of harm and gather new intelligence about offenders. But City of London police can't add its own

flags to the system that alerts frontline responders – the Metropolitan Police’s CAD system. This is because the system doesn’t have that functionality.

Frontline officers told us they only know about sex offenders in the force area from briefing slides. They don’t get this information from markers on the force’s systems.

However, the control room systems do have information that can be used to alert frontline responders.

- PPU supervisors update intelligence records about vulnerable and high risk children who live in the force area.
- The Metropolitan Police Service adds homes in the City of London where children are on child protection plans to its CAD system.

The force is working to improve its control room systems. It is investing in new systems, but these aren’t in place yet.

Some changes have been implemented. Control room staff can get information from the force’s own and the Metropolitan Police intelligence systems. But there are no longer any intelligence staff based in the force control room. Control room and frontline staff told us this often meant it took longer to get intelligence support when responding to incidents.

### **Control room managers introduced interim measures to prompt better responses to vulnerable children**

Force leaders told us that they are planning to modernise the control room systems to improve the quality of information for frontline responders.

In the meantime, they have introduced paper checklists for control room staff to use when sending officers to incidents. These checklists, such as the ‘20 point domestic abuse plan’, include prompts to remind officers to turn on their body-worn video cameras. They also tell control room staff to inform response team supervisors about domestic abuse incidents.

We saw responding officers mostly using body-worn video appropriately when they thought children were at risk.

We reviewed five cases where officers protected children by taking them into police protection. In three of these cases the officers made good use of the video to record the children’s circumstances and what they said. This allows the police to make better referrals to CSC services – so children get the help they need.

### **Case study: good use of body-worn video to record the voice of the child**

Officers responded to an incident where they found a drunk woman and her five-year-old daughter. They arrested the woman and placed the child into police protection.

The officers recorded the incident using body-worn video. It was clear the woman was incapable of caring for the girl. The child was upset and crying. When the officers spoke with the child she asked for her father.

They took the child to a place of safety. A [designated officer](#) took responsibility for the incident and contacted CSC services to plan for the child's safety.

After they completed checks with CSC, they placed the child with her father and the incident concluded.

The police records contained strong evidence about the incident and the rationale for the officers' actions – which clearly prioritised the welfare of the child.

### **The force hasn't given control room staff the training they need in risk and vulnerability**

Control room staff are responsible for communicating between the public and responding officers and making decisions about how to respond to child protection incidents. But some control room staff told us they hadn't received any formal vulnerability training for two years. Their shift pattern doesn't include time for regular training.

This means that they may not have the training they need to recognise some risks or decide on the appropriate response. It reduces their ability to offer guidance and advice to officers going to incidents where children or vulnerable adults are at risk.

Sometimes managers give ad hoc training and guidance. This includes presentations on how to use the threat, harm, risk, investigation, vulnerability and engagement (THRIVE) risk assessment when dealing with calls.

### **The force doesn't have a system to measure the quality of its responses to risk and vulnerability**

Control room supervisors don't routinely quality assure the work of their staff. There is no regular process to check whether decisions are appropriate. So managers don't know whether control room staff or responding officers are following instructions – for example, checking to see that officers are using body-worn video.

It also means the force doesn't know if control room staff are giving frontline responders timely intelligence and updates about child protection risks. We were told that control room staff are following force directions, such as using THRIVE to assess incidents.

Control room performance isn't reviewed to find examples of best practice or see where service improvements are needed to get better end results.

# Investigation

## Recommendations from the 2019 inspection report

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.

## Summary of post-inspection review findings

Child protection investigations have improved. Supervisors direct investigations well and make sure the children involved are protected. They make good quality referrals and hold strategy discussions quickly.

Frontline officers use body-worn video when speaking to vulnerable people and children. Investigating officers use these recordings as evidence in investigations and to plan safeguarding activity.

The force doesn't have good systems to investigate online child abuse.

Many investigations into online sexual abuse don't prioritise the safety of children or involve partner organisations early enough.

Frontline officers are not sure how to investigate online child sexual abuse.

## Detailed post-inspection review findings

### PPU officers have improved the quality of their investigations

In our 2019 inspection we reviewed the quality of seven child protection investigations and found that none were good, one required improvement and six were inadequate. We saw that:

- investigators and supervisors were not managing cases effectively, leading to delays;
- investigators were not recording the voice of the child;

- follow-up work with other agencies after the initial phase of a case was inconsistent; and
- investigators were missing wider safeguarding concerns that might affect other children.

We saw significant improvement in this inspection. We reviewed five child protection investigations. We found four to be good and one required improvement.

We saw evidence of timely strategy discussions. The investigations are well managed and supervised, so there is no drift or delay. Investigation plans are clearly recorded – giving good direction to officers about what to prioritise and when.

The investigators recognise wider risks to other children beyond the immediate incident and safeguard them. They share information with partner agencies, and this helps to identify risks and plan how best to help the children. Officers considered the needs of the children in all the cases we saw.

### **PPU supervisors oversee child protection investigations and referrals well**

PPU supervisors hold planning meetings with other safeguarding partners quickly, usually on the day of the referral. If the children live outside the City of London the meeting is held within 48 hours. This avoids delays in deciding which cases should be referred to local CSC services or to another force area.

The CSC manager told us that the PPU provides good and timely information and works well with multi-agency partners to identify risk and protect children.

Responding officers understand that they need to complete PPNs for vulnerable children as part of the referral process. During normal working hours Monday to Friday PPU staff review PPNs promptly. This means that officers get immediate feedback and can gather any missing information.

But outside those times, when PPU staff are not on duty, frontline supervisors don't always check PPNs before officers submit them. This can cause delays if PPNs are missing information.

We saw some short delays in referrals and strategy discussions because non-PPU officers had to contact CSC services without the appropriate training or experience.

The PPU detective inspector carries out a quality assurance process and reports problems to the crime scrutiny group.

### **The force understands how body-worn video helps to gather good evidence and safeguard children**

We saw that frontline officers are consistently using body-worn video to record incidents where children are at risk.

PPU investigators can access these recordings and are using them as evidence in child protection investigations and to help to make safeguarding plans.

Control room staff remind responding officers to turn on their body-worn video at incidents such as domestic violence. But officers can decide to use body-worn video in any incidents.

### **Case study: an effective investigation prioritising the welfare of the child**

Officers responded to a home where they found a seven-year-old boy had been neglected by his father.

They arrested the father and took the boy into police protection. While at the scene the officers used their body-worn video to record what the child said to them. They also recorded the incident on a PPN.

They held a meeting with CSC services without delay and the child was safeguarded.

The PPU carried out an investigation using the video evidence from the scene.

As a result of the investigation, they decided not to prosecute the father and documented the reasons for this decision clearly.

There was good oversight from supervisors throughout. The welfare of the child was clearly at the centre of the investigation.

### **The force hasn't improved how it investigates child sexual abuse**

In our 2019 inspection we reviewed the quality of six child sexual abuse investigations and found that one was good, two required improvement and three were inadequate. We saw that:

- although the initial response to incidents was good, officers often missed the wider safeguarding risks to children beyond the immediate incident;
- they didn't always consider risks to other children;
- they didn't always record the voice of the child; and
- investigators overlooked enquiries that might help to identify and locate perpetrators and didn't consider the consequences of delays.

In this inspection we reviewed five sexual abuse investigations. We were disappointed to find that the force's performance hasn't improved over this period. We found three investigations required improvement and two were inadequate.

### **The force still doesn't investigate online child abuse well**

The PPU investigates intelligence about online offenders from national and international law enforcement agencies. These include the National Crime Agency (NCA), child protection systems (CPSys) and child online protective services (COPS).

The intelligence includes addresses where indecent images of children are being downloaded or distributed in the force area. The PPU must risk assess the information so it can safeguard children and deal with offenders.

Supervisors generally allocate the investigations to officers quickly and officers give regular updates about the progress of the investigation.

However, systems and processes don't always support successful investigations.

Risk assessments use the [Kent internet risk assessment tool \(KIRAT\)](#). We found that KIRAT assessments are limited because they only examine intelligence on the force's own systems. This means they are often based solely on police information. The risk assessments are held on a standalone system, which means the information isn't immediately accessible to other staff in the force.

We found that the PPU is slow to make referrals or request meetings with CSC services. This means they are missing out on information from local organisations, including social care, health and education, which could be vital in assessing risks. Opportunities for multi-agency working to safeguard children are being delayed and missed.

Some cases referred by the NCA are delayed because they are wrongly given to other forces first. This, in turn, leads to delays in action to safeguard children. Managers told us they haven't escalated this problem to NCA leaders. But the PPU detective inspector has agreed locally with the Metropolitan Police Service to quickly reroute such referrals back to the City of London Police.

### **Case study: a lack of focus on safeguarding children**

The NCA referred a suspect in the City of London who emailed indecent images of children. They wrongly sent it to the Metropolitan Police Service first, which delayed starting the investigation.

A supervisor reviewed the referral. They made an investigation plan and gave it to an investigating officer.

The officer didn't do any checks with CSC services, health or education as part of their risk assessment and supervisors didn't raise this as an action. The officer assessed the risk as low, even though they didn't know if the suspect had access to children.

There was a delay of six months from the referral before officers spoke to the suspect.

The suspect denied emailing the images but did identify the person they were sent to. He claimed that someone else had taken control of the email account. The officer never questioned the person who received the email.

The investigation didn't consider whether the suspect posed a wider safeguarding risk to other children.

The force couldn't verify the full internet protocol (IP) address of the suspect's email account. The investigation was closed by a supervisor as requiring no further action.

## **The force needs better systems and capability to tackle online child abuse**

The force isn't able to respond effectively to offenders who distribute indecent images of children because of technical and operational problems.

Only the acting detective inspector is trained to use the KIRAT system. And only one detective constable is trained to use the CPSys, which they check twice weekly.

Managers told us that the force cybercrime unit could develop intelligence about potential offenders in the City of London. But it isn't tasked to identify sites or offenders involved in distributing indecent images of children.

The force doesn't fully understand the benefits of the [child abuse image database \(CAID\)](#). To use this system well, officers should be trained to examine indecent images, grade the levels of abuse they find, and record them on the database.

But City of London police officers are not able to grade indecent images of children or upload them onto CAID. They don't use tools such as facial and crime scene identification to examine images. And they don't record details of the victims they identify.

The force should be doing these things, not only to support its current investigations, but also to help solve future cases. It means that if other forces seize images of the same children, officers will know they have already been identified as potential victims of online child abuse.

Recording this information on CAID can also help forces in the UK and abroad to identify new indecent images and children who are at risk.

Managers told us the Metropolitan Police Service has agreed to examine some images on behalf of the force.

## **Online child abuse investigations are ineffective**

Sexual offenders who abuse children are often devious and manipulative. Investigations need to be thorough and robust to challenge their account of what happened.

We saw investigations where officers missed opportunities to gather evidence of offences or identify children at risk.

Investigating officers ask some suspects to come in for interviews voluntarily instead of arresting them. This means officers can lose their chance to search the suspect's home for evidence, which reduces their ability to safeguard victims. Arresting suspects allows police to apply [bail](#) conditions that protect victims and witnesses.

We saw investigations that ended before all lines of enquiry were exhausted. In some cases, officers don't complete checks or strategy discussions with safeguarding partners. This is particularly important where an unknown child is at risk. Any information from multi-agency partners might be crucial to help identify and safeguard them.

Investigating officers don't always look for all the potential victims of suspected offenders. They aren't planning how to identify any other children that offenders had contact with and approach these children so they feel safe. We didn't see any records of PPNs submitted for children associated with the suspects.

### **Case study: ineffective investigation and safeguarding**

Following a referral about indecent images of a child, officers got a warrant to search the suspect's premises.

During the search they seized several electronic devices for examination.

The officers also found a travel card belonging to a girl. The suspect told them she was his teenage niece, but that she didn't visit him alone.

They didn't arrest or question the suspect. Instead, they asked him to come to the police station three days later.

They decided this because the intelligence was only about a single image and checks with CSC services suggested no children lived at his address. They also needed time to examine the electronic devices.

We asked the force to review its decision because officers hadn't checked the vulnerability of the girl and had relied on the word of the suspect. Therefore we were concerned about her welfare.

The force responded appropriately to our request.

### **The force hasn't prepared its staff to deal with online child sexual abuse**

The force said that it had no reports of indecent images of children being distributed between children.

There are five schools in the City of London. The PPU has spoken to school staff to raise awareness of the risk of children sending indecent images or asking other children to take images of themselves. But the schools have never reported any such incidents or concerns to the force.

Frontline officers don't have the knowledge and skills to investigate children making or sending indecent images. Officers told us they were unaware of the force policy or guidance on the subject.

They said they would ask the PPU for help if they were dealing with an incident with sexual abuse images. This means they rely heavily on the PPU. When PPU staff are not on duty, evidence gathering and action to safeguard children may be missed or delayed.

# Managing those posing a risk to children

## Recommendation from the 2019 inspection report

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.

## Summary of post-inspection review findings

The force's risk management plans have good factual information but are lacking in active plans to manage risk.

There is supervision of offenders, but it is not robust. Some supervision practice is outside national guidance.

The force isn't using intelligence effectively to manage the risk of all sex offenders in its area.

## Detailed post-inspection review findings

### PPU officers manage the risk from registered sex offenders alongside wider safeguarding duties

The force relies heavily on one officer for [management of sexual or violent offenders \(MOSOVO\)](#). This officer has multiple safeguarding responsibilities, which include being the central point of contact for the [Violent and Sex Offender Register \(ViSOR\)](#), as well as local point of contact, administrator and offender manager supervisor. These roles aren't covered by anyone else in the force's structure.

The acting detective inspector is the only experienced officer in this area. Although they are supported by two detective constables and a detective sergeant, these officers are all new to MOSOVO. This means the offender management service is not resilient.

The offender managers supervise the City of London's two registered sex offenders. They are in regular contact with the offenders and meet the nationally recommended contact required for their level of risk.

Senior managers know it is essential for offender managers to maintain their skills and use their specialist training. But this is difficult with so few offenders to manage. They have arranged for City of London Police offender managers to work on attachment to MOSOVO units in other forces, so they can use their specialist skills and keep their knowledge up to date.

These attachments haven't happened recently because of staff shortages in the PPU. But we were told that the force intends to start them again once the team is back to full strength.

### **Offender managers don't use national systems consistently**

Offender managers are required by statute to carry out annual registration of offenders at designated police stations. But we found this is being done at offenders' home addresses. The force didn't give us any valid reasons why its staff are not following the statutory process.

One of the annual registrations was late. Although the offender had a plausible reason for this, it is still a criminal offence. It should have been recorded as a crime and dealt with as such.

We saw aspects of good practice in managing registered sex offenders. Officers carry out unannounced visits, announced visits and telephone calls. They use the ViSOR management system correctly and records are up to date. They use the [active risk management system \(ARMS\)](#) to assess the risks from offenders. The records we saw had good details and relevant information about the risks.

But we found the offender managers aren't completing the whole risk assessment process at the same time. This process should include:

- a visit;
- an OASys sexual reoffending predictor (OSP) assessment;
- the ARMS assessment: and
- a risk management plan.

Rather than following all these steps, we saw a more disjointed process, which affects the quality of the risk management plans. They are statements of fact rather than an informed plan to manage the offender's risk.

We saw that officers record management actions in the general report rather than separately in the system's actions tab. This makes it more difficult to check and track actions later on.

## **PPU staff use intelligence reactively**

We saw offender managers updating the force's records and intelligence systems with information about the registered sex offenders they managed. This is helpful to staff in other roles. But, as noted earlier in this review, the force doesn't use warning markers or flags on its control room systems to alert frontline responders about offenders' addresses and the risk they pose.

Although there are only two registered sex offenders living in the force area, around 500,000 people travel into the City of London each day. Some of these may be sex offenders and they could be a risk to children.

The MOSOVO unit has no information about offenders who travel into the City of London. This is an intelligence gap which means there is unknown risk for children living in the area. The City of London Police should collaborate with criminal justice organisations who manage offenders in other parts of the UK. They may have information about these people which could help reduce risks to children.

# Police detention

## Recommendation from the 2019 inspection report

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.

## Summary of post-inspection review findings

Managers provide custody staff with regular training and feedback on children in detention.

Custody staff are aware of their responsibility to promote the welfare of detained children.

There are delays before appropriate adults arrive to support detained children.

## Detailed post-inspection review findings

### Custody staff clearly understand that detained children are vulnerable

Managers require all custody staff to complete the online vulnerability training on College Learn (formerly NCALT). They provide a custody staff training day every ten weeks. The force custody manager decides the content of this training. Recently subjects included a focus on vulnerability, self-harm, mental ill-health and suicide prevention.

We saw that inspectors' reviews of children in detention are timely and mostly in person. The records show an appropriate focus on both what is needed for the investigation and the child's welfare. All the children are seen by healthcare professionals. Detained children are always referred to the youth offending team. The force only has a limited [liaison and diversion](#) service. This means that officers have to contact the liaison and diversion team by email rather than in person.

The force offers interpreters through [LanguageLine](#) and for immigration referral cases. We saw records of children being given culturally appropriate food, such as Halal meals. A female officer is assigned to every female child detainee.

The force custody manager reviews custody cases to find examples of good practice and areas for improvement. Some of the themes they review include:

- all detained children;
- appropriate adult provision; and

- referrals to support services.

The custody manager uses the learnings in training and gives feedback to staff.

### **There are delays before appropriate adults arrive to support detained children**

In this inspection we reviewed three recent cases of children in police detention. We found that all three cases needed improvement. This was mainly because there were delays of two hours, six hours and nine hours before appropriate adults arrived.

In the longer delays, the appropriate adult might arrive at the custody suite the next morning for a child who was detained during the night. Or they come only when investigating officers are ready to interview the child.

The force has a memorandum of understanding with the local authority to provide appropriate adults 24/7, within an hour of request. Custody sergeants know about this policy, but the delays continue.

### **The force is working to improve its custody arrangements**

The force wants to improve the quality and consistency of its custody team's work and develop their knowledge and professionalism. Managers told us they are working to increase the numbers of dedicated custody sergeants and detention officers.

This is welcome, because we saw staff working in custody who didn't understand what to do in some situations – for example, how to get [alternative accommodation](#) for detained children.

#### **Case study: a child held in police custody for one day and 17 hours**

A 17-year-old male child in the care of a local authority was arrested for drugs and driving offences. He had also been reported missing from home.

Officers focused on the criminal investigations first. A healthcare professional saw the child promptly. But an appropriate adult didn't see him until he had been in custody for six hours.

The child was asleep both times the inspector reviewed his case, so the reviews didn't fully consider his welfare.

The force was slow to inform the child's local authority CSC services about his situation. They only noted that he was reported as missing on the custody record during his second day in detention.

The custody record showed the force contacted City of London CSC services and the child's local CSC service to find him accommodation after he was charged. This shows staff were concerned for his welfare. However it was not appropriate in this case as he had a no bail warrant from the court.

## Next steps

The force is working to improve the quality of its performance management information. This will help leaders to understand how effective the force is in responding to vulnerable people and children.

City of London police still needs to act to:

- make sure all its staff are trained to recognise vulnerability and protect children;
- improve control room systems so frontline responders get the information and support they need to deal with risk and reduce vulnerability;
- make sure officers have the capability to respond to all forms of online child abuse and reduce the risk to children;
- improve the quality of its MOSOVO risk management plans; and
- make sure appropriate adults arrive in time to support detained children.

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