

National Crime Agency Inspection

**Safeguarding: How effective is the
National Crime Agency at protecting
vulnerable people?**

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Summary

The [Children Act 2004](#) places a duty on the National Crime Agency (NCA) to safeguard and protect the wellbeing of children. While the organisation doesn't have this duty to all adults, it does have responsibility for safeguarding vulnerable adults.

This inspection looked at how the NCA safeguards children and vulnerable people.

One of the NCA's primary roles when safeguarding children and vulnerable adults is to identify any vulnerability and notify the appropriate organisation. It has a responsibility to intervene to safeguard people who are at immediate risk of harm.

The NCA also works with many national organisations and working groups that influence how law enforcement responds to child abuse and adult safeguarding.

Effectiveness of policies, structures and processes

The agency's aim is for safeguarding to be at the heart of all its work, and central to its aims, goals and values. It refers to safeguarding being the "golden thread" throughout all it does, in all directorates.

However, the investigations directorate is responsible for oversight and governance of safeguarding. We found that this led, in some cases, to safeguarding being viewed as solely the responsibility of specialists or those involved in investigations. The NCA doesn't have a safeguarding board, or other governance structure, with oversight of safeguarding effectiveness throughout all directorates.

In its investigations, the agency has effective processes for assessing the risks related to children. But it doesn't have processes that are applied consistently to assess the risks to children and vulnerable adults throughout all its directorates, including intelligence and threat leadership.

The NCA has policies for both child and adult safeguarding. The policies and guidance for officers are comprehensive and easy to find when needed. But the rest of the workforce's understanding of these policies and individuals' safeguarding responsibilities varies.

We found that those who used the child protection and safeguarding team's services valued its work. This includes victims, their families and other safeguarding organisations. The NCA relies heavily on this small team to design and put in place its safeguarding plans, and provide operational advice throughout the organisation. For many in the NCA, safeguarding isn't seen as part of their primary function. As a result, they rely on the expertise and willingness of this small team to take responsibility for this work.

Safeguarding leadership and culture

We found that senior leaders consistently emphasise the importance of safeguarding in the agency's work.

Safeguarding children and vulnerable adults features prominently in the [NCA Annual plan 2021/22](#). The plan refers to child protection and safeguarding adults, including exploitation involving modern-day slavery. But we found that, in some cases, the importance of safeguarding wasn't reflected in day-to-day work. For example, safeguarding isn't always part of the processes for prioritising work.

We found the head of safeguarding provided good leadership, and their work had highlighted the importance of vulnerability and safeguarding throughout the organisation. We were also encouraged by the child protection and safeguarding team's work. Child protection advisors (CPAs) are helping to raise awareness of safeguarding throughout the organisation.

The NCA has a quarterly assurance review (QAR) process for all investigations. This process, in part, aims to identify good ways of working and learning from individual investigations. This is then shared throughout the organisation. The QAR is improving, and we would encourage the NCA to invest more in this process.

Training provided to staff

The NCA has arranged mandatory online safeguarding training, which most staff have completed. It provides a basic understanding of a range of safeguarding issues. The child protection and safeguarding team give extra training to all investigators, some intelligence staff and other specialist teams.

The child protection and safeguarding team is small, and providing this training is one of its many responsibilities. While this is an important role, it does distract the team from supporting investigations. If the team is to maintain its current work and be an integral part of improving the safeguarding capability of the entire workforce, it needs more resources.

Bridging the gap between national activity and local safeguarding

The NCA operates across national borders and in all regions of the UK. Safeguarding children and vulnerable adults are mainly provided at a local level, by organisations such as the police and local authorities, but not the NCA. This makes it harder for the NCA to operate effectively at both national and local levels.

In part, to address this problem, the NCA employs experienced social workers as CPAs. Part of the child protection and safeguarding team, they work with local organisations to keep children and vulnerable adults safe.

The child protection and safeguarding team advises investigators on how and when to refer child protection issues to local authority teams. It also keeps a record of all referrals.

Recommendation

We make a single recommendation:

By 30 September 2022, the NCA should develop a safeguarding plan, which makes clear how it intends to put safeguarding at the heart of its work. The plan should make sure:

- the role of the child protection and safeguarding team is clear and that the team is sufficiently resourced to support the plan;
- the intelligence, investigations and threat leadership directorates are subject to safeguarding governance and oversight; and
- there is clear policy and guidance for safeguarding children and adults, which is communicated and understood by all staff.

Introduction

Our commission

Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) is an independent inspectorate. The [Crime and Courts Act 2013](#) requires us to inspect the NCA. Following an inspection, we must report to the Home Secretary on the agency's efficiency and effectiveness.

This is our tenth inspection of the NCA. It examines the organisation's ability to safeguard children and vulnerable adults.

About the National Crime Agency

The NCA is the UK-wide, crime-fighting agency. It is responsible for leading, supporting and co-ordinating the response to serious and organised crime.

This includes:

- human trafficking;
- weapons and drugs trafficking;
- cyber crime and economic crime that crosses regional, national and international borders; and
- child sexual abuse and exploitation.

The agency has two statutory functions: crime reduction (investigations) and intelligence. It also leads the national response to serious and organised crime. The threat leadership directorate oversees this work. It has more than 5,500 officers. Of these, 150 work in 53 countries worldwide.

The responsibility for safeguarding sits within the investigations directorate. Both the intelligence and the threat leadership directorates have a part to play in the assessment of risk in safeguarding.

Statutory responsibility

[Sections 11 \(England\)](#) and [28 \(Wales\)](#) of the Children Act 2004 place duties on a range of organisations and individuals to ensure their functions, and any services that they contract out to others, safeguard children.

Section 8(1) of the Crime and Courts Act 2013 confirmed that the NCA is subject to Sections 11 and 28 of the [Children Act 2004](#). The requirements for safeguarding structures are set out in chapter 2 of the statutory guidance [Working together to safeguard children \(2018\)](#). Similar legislation applies in Scotland and Northern Ireland.

The legislative framework for adult safeguarding isn't as strong as that for children. But protecting the public is a responsibility of the NCA, as set out in its [Annual plan 2021/22](#). The plan states: "In the course of its investigations, the NCA must safeguard vulnerable individuals and victims, working with partners to ensure they receive the most appropriate care and support."

Child protection and safeguarding context

Reported abuse and exploitation in the UK continue to rise. The NCA's child sexual abuse referrals bureau receives all UK referrals of online child abuse. In 2021/22 the referrals led to 12,529 children being safeguarded. This was a 50 percent increase on the previous year.

Between 2011 and 2013, we inspected the 43 police forces in England and Wales. We identified several areas of concern in relation to child protection. And this led to a decision to develop a programme of child protection inspections. We published inspection reports in [2015](#) and [2020](#) that summarised the role of the police in keeping children safe. The NCA wasn't included in those inspections.

In our 2015 report, we found that forces had prioritised vulnerable people. There was evidence there had been an increase in staff investigating offences involving vulnerable people. But we commented on the significant gap between the strategic intention of forces and practice on the ground.

The second report, in 2020, showed progress in how policing dealt with vulnerability. We found there had been more investment in safeguarding, but this didn't necessarily lead to better decisions for children. Supervision of investigations was inconsistent, and police didn't recognise or evaluate risk well enough. Overall, forces dealt with obvious cases of child abuse promptly but didn't deal with complex cases as well. There were still too many cases of criminalising child victims of exploitation.

In 2020, during [our previous inspection of the NCA's crime reduction function](#), we found that investigators saw the function of safeguarding as the role of a small specialist team. Safeguarding wasn't considered to be everyone's responsibility. This differed significantly to our findings in police forces in England and Wales where safeguarding was increasingly seen as everyone's responsibility.

During our latest inspection, however, it was clear that there had been a significant national shift in law enforcement, from investigating theft, drugs and firearms, towards crime that causes the most harm to vulnerable people. The NCA's [2021 National strategic assessment of serious and organised crime](#) leads with "exploitation of the vulnerable".

It isn't reasonable to directly compare how the NCA and police forces safeguard children and vulnerable people. The NCA's responsibility is to identify vulnerability and make the appropriate organisation aware of the problem. If the risk is immediate, the NCA must act to keep the child or vulnerable adult safe, at the same time as making the relevant referral.

The NCA needs to consider what type of approach it will take to develop a culture of safeguarding. Safeguarding should either be part of everyone's decision-making or the responsibility of an expanded specialist team.

Terms of reference

We consulted the director general of the NCA when creating the terms of reference for this inspection.

Our terms of reference were to consider the NCA's ability to effectively safeguard people as part of its purpose.

We sought to answer the question: how effective is the NCA at safeguarding vulnerable people?

We examined:

- how well the agency's policies, structures and processes made sure vulnerable people were correctly identified and protected;
- how well the NCA's leadership and culture promoted the safeguarding of vulnerable people;
- how well the training provided to staff promoted effective safeguarding of vulnerable people;
- how well the NCA supported national and international organisations that work to keep vulnerable people safe; and
- how effective the NCA was at bridging the gap between its national activity and local safeguarding processes.

Methodology

We visited NCA teams throughout England, Wales and Scotland. As part of our inspection, we also included the child protection advisors' work in Northern Ireland.

Our inspection included visits to:

- branch investigation teams;
- high-harm disruption teams;
- specialist child protection investigation teams; and
- central services and their teams in London and elsewhere.

At each place, we spoke to people of all grades and functions, as well as those with portfolio responsibilities. We went to Operation Stovewood, a child protection investigation in Rotherham that the NCA is investigating at the request of South Yorkshire Police. And we spoke to the local authority and the NHS working with the team.

We went to NCA premises to view case material, examine data and observe the systems in operation. While there, we read briefings and attended planning meetings.

We went to a range of safeguarding training events. These included branch training days, continuous professional development sessions for specific roles, and the nationally accredited courses for professional investigative practice (PIP) for investigators.

We carried out pre-inspection planning from June 2021. And our fieldwork took place between October and December 2021.

We reviewed NCA documents before and during the fieldwork, including:

- the NCA *Annual report and accounts 2020/21*;
- the 2021 *National strategic assessment of serious and organised crime*;
- monthly performance packs for July and September 2021;
- CE01 *Child protection and safeguarding policy and associated guidance*;
- IV38 *Adult safeguarding policy*; and
- investigative professional practice (IPP) guidance.

Finally, we interviewed the head of safeguarding and the deputy director of the investigation directorate.

Findings: Effectiveness of policies, structures and processes

This section covers:

- governance of safeguarding;
- the child protection and safeguarding team;
- risk assessments;
- safeguarding considerations;
- record keeping; and
- adult safeguarding.

Governance of safeguarding

In addition to the NCA's two statutory functions – crime reduction (investigations) and intelligence – it also leads the national response to serious and organised crime. This includes child sexual abuse, modern slavery and human trafficking, organised immigration crime, drugs and firearms. The agency manages this through a threat leadership directorate.

NCA policies and guidance

There is a policy for safeguarding and child protection (CE01), and a separate policy for adult safeguarding (IV38). These are the responsibility of the head of safeguarding and owned by the director of the investigations directorate.

To support the CE01 policy, there are operating procedures, guidance notes and links to the investigative professional practice (IPP) manual. The IPP manual explains what is expected and what to do in relation to child protection. We found that some of the advice in the operating procedures and guidance notes wasn't always aligned with the IPP manual, which caused confusion.

In the case of police protection order powers, for example, the IPP manual is correct and clear but the guidance note (GN01) is confusing. So we found that staff with the designated powers to take a child into police protection, and those then needed to authorise that decision, weren't always aware they had that power to authorise.

Our search of the NCA intranet for "safeguarding" found a full list of the safeguarding policies. There are also policies for managing victims, the Victims' Code, witness management, and suicide prevention that are relevant to safeguarding. But these policies are all in different places. We would encourage a single location for these

policies that is easily searchable. This will mean that officers are able to easily locate and follow guidance.

Suicide prevention policy

The NCA played an important role in the development of the national policy to manage the risk of suicide. In the NCA's suicide prevention policy, it explains that it is NHS England's responsibility to manage the welfare of suspects who experience a mental health crisis. Child exploitation and online protection (CEOP) and child sexual abuse investigation teams understand this. But we found officers in some branches were unaware of NHS England's responsibilities. This has led to officers taking calls from families and individuals in crisis without the skills to deal with them. For such critical issues, there are potentially fatal consequences for individuals and risk to the NCA's reputation. This shows a gap between the policy and staff's knowledge and understanding.

Safeguarding as a central theme

In the strategic briefing, we were told that the agency intends to place safeguarding at the heart of everything it does. How and when they will achieve this is not yet clear.

The director general for operations oversees intelligence, investigations and threat leadership functions. While he is also responsible for safeguarding, governance sits solely within investigations. Having safeguarding governance in just one of the three functions may undermine the agency's intention to make it everyone's responsibility, including those in intelligence and threat leadership. The NCA should consider whether safeguarding should sit within all directorates, or be independent of them.

Changing how and where safeguarding is governed would make sure that the entire workforce understands and refers to the relevant policies. At the time of our inspection, we found that the investigations directorate mainly referred to the safeguarding policies. We found little evidence of the intelligence or threat leadership functions being involved in risk assessments for safeguarding.

The child protection and safeguarding team

Child protection advisors

The NCA's dedicated child protection and safeguarding team has 30 child protection advisor (CPA) posts, but 12 vacancies. Based in offices in London, Greater Manchester and Northern Ireland, the team works throughout the UK.

CPAs are qualified social workers and help investigators safeguard children and vulnerable adults. They don't perform statutory social work, which the relevant local authority is responsible for.

The child protection and safeguarding team originally supported specialist child protection investigations as part of CEOP. Its role has expanded significantly in the past three years to include leading the NCA's safeguarding response. The team also maintains the Click CEOP system for reporting online abuse.

We found CPAs' work to be valued by all those who have used their expertise. The level of knowledge about the role of the CPAs, however, varies considerably throughout the NCA. And some teams don't know how or when to contact them.

All child protection investigations in CEOP and the high-harm disruption teams are referred to a CPA. They will conduct research using local authority databases and prepare a safeguarding plan if appropriate. CPAs will also attend scenes of warrants or arrests if asked, to help manage any child protection issues. Outside these departments, the request for CPA support is at the discretion of the investigator. This means that the allocation of work is based on relationships rather than prioritised by a systematic risk assessment.

In most cases, the CPA will take the safeguarding responsibility away from the investigator entirely. The CPA will then submit child protection referrals to the local authority and attend follow-up planning meetings. In other cases, they will support the investigator through the process. Sometimes, investigators will make a referral without consulting a CPA.

The CPAs are willing to help wherever they can and will advise on adult safeguarding issues. But staff we spoke to during our inspection said that the exclusion of adults from the job title may deter people from asking CPAs to help in adult cases.

We found that the amount and variety of work the CPAs did was significant. This includes providing training, and writing and maintaining NCA policies. There aren't enough CPAs for the current workload. Any increase in the resources for this department can only be considered once the NCA has a plan for managing safeguarding.

National online reporting

Click CEOP is a web-based reporting system, which is managed by the NCA on a 24/7 basis. The system is for children and parents to report inappropriate online contact. Children are also encouraged to contact the NSPCC if they aren't ready to report an incident but want to talk to somebody about it.

We found that, over time, fewer people were using the system. It is outdated compared with other online social media sites young people use. As it isn't an emergency service, it isn't clear what it offers that the NSPCC and local police can't provide. Although it offers little benefit, Click CEOP creates an extra burden for the child protection team and distracts them from supporting investigations.

We would encourage the NCA to review the costs of Click CEOP and its benefits, to assess whether the system should be decommissioned or modernised.

Risk assessments

Risk assessment models

There is no single model that effectively assesses risk throughout all the elements of law enforcement. So it is necessary to adapt risk assessments to a specific law enforcement problem.

The NCA uses different risk assessment tools depending on the situation. But it doesn't have a framework, for use throughout the organisation, for assessing threat, harm and risk.

Police forces use the [THRIVE model](#) (threat, harm, risk, investigation, vulnerability and engagement) alongside the national decision-making model for risk. THRIVE provides a consistent framework for considering risk and vulnerability from the first point of contact to the decision to close an incident or investigation.

The NCA uses different models for online offending, but mainly relies on the [KIRAT risk assessment approach](#). KIRAT assesses the potential for online offenders becoming contact offenders (and trying to meet and harm a child).

The NCA also uses other types of risk assessment in child protection. For example, Operation Shadowist, which was set up following a surge in child abuse, uses a different risk assessment tool. This has a bespoke risk assessment referred to as a high-harm assessment. The approach used in this case has been effective and will continue to be used in the future. The CPAs use a different risk assessment model, based on what social workers use.

Operation Stovewood, an NCA investigation into child abuse in Rotherham, adopts the THRIVE model, which South Yorkshire Police and other organisations involved use. This allows risk assessments to be transferred more easily between organisations.

We found that all these different risk assessments were effective in assessing the risk to children. We found that the NCA used these risk assessments to make good decisions about the speed of response required to safeguard children. This approach helps determine if another organisation is better able to respond quickly.

Investigations

The NCA child protection investigation teams are good at identifying and assessing risk to children. But we found some examples where this wasn't the case within investigation teams that weren't child protection specialists. We found cases, including where a child was a suspect, where no assessment or safeguarding relating to the child had taken place. We found little evidence of regular reviews of risk assessments, as we might reasonably expect in investigations.

Our case reviews found that risk assessments, where completed, were focused on the risks to suspects and reputational risk to the organisation. There was often reference to risk posed to children, where linked to a suspect, but very little evidence of the risk assessment of the safeguarding needs of the child or others.

We also found evidence that safeguarding wasn't a primary consideration for investigators. For example, we found some cases of unnecessary delays of up to three months before referrals about children were made to local authorities. In some cases, these referrals only followed milestones in the investigation, such as an arrest made or a warrant issued.

We found some good examples of where senior investigating officers had taken full account of the safeguarding needs of children, even where child sexual abuse wasn't a concern. And we would encourage this approach for all investigations.

Intelligence

The child sexual exploitation referral bureau is part of the intelligence directorate. It assesses all referrals from companies such as Facebook, using the KIRAT model. Intelligence staff are also responsible for the initial Shadowist assessments for those cases meeting that criteria.

For cases not involving online abuse, we found evidence that risk assessment was sometimes completed when intelligence was received and during the process of assigning tasks. But we were unable to find any system or process that would make this consistent. We were told that staff used their judgment to assess risk to children.

We encourage the NCA to reassure itself that there is a process within the intelligence function to make sure safeguarding risks are properly considered when intelligence is received and assessed.

Safeguarding considerations

As with other law enforcement organisations, the NCA has a responsibility to identify and protect vulnerable people. This isn't always straightforward and is more difficult for a national organisation that operates throughout 43 forces and hundreds of local authorities. Some victims and vulnerable people are harder to identify than others. This is often the case in crimes involving county lines, where children are part of the criminality.

We found examples of good work where investigators identified potential risk of harm or abuse to children, and acted appropriately. We found examples where officers took children who were at risk into police protection. But we found little evidence that there was consistent consideration for safeguarding and harm in all investigations.

A branch manager reviews cases during the quarterly assurance review (QAR), every three months. We encourage the NCA to consider including safeguarding considerations in the review process, to make sure vulnerability is considered as part of all investigations.

Record keeping

The NCA has a variety of processes, documents and systems for recording everything that relates to safeguarding. We found that records were kept in a variety of ways, including personal notebooks, emails, spreadsheets and the case management system (ATLAS CM). There is no policy on how safeguarding information, issues and decisions should be recorded. ATLAS CM is suitable for this but isn't always used. Poor record management can ultimately undermine investigations and legal proceedings.

In [our 2020 inspection of the NCA's crime reduction function](#), we commented on the underuse of ATLAS CM in record keeping during investigations. In this inspection, we found the same problem. The senior leadership team need to make sure investigators use ATLAS CM as the main way of recording information during investigations.

Adult safeguarding

In 2019, the NCA decided to improve its response to vulnerability more generally. It rightly prioritised improving child protection processes. We were pleased to see that it had significantly improved how it protects children. It now needs to do more to improve its adult safeguarding.

The agency has a policy for adult safeguarding, but this is limited in detail and doesn't help investigators safeguard adults. The IPP manual contains more detail but we found there was limited understanding of adult safeguarding among staff, in both investigations and intelligence. It would be beneficial to raise awareness of relevant policies among staff.

Findings: Safeguarding leadership and culture

Over the past decade, law enforcement organisations have recognised the need for a greater emphasis on safeguarding those most vulnerable in society, particularly children. More recently, this has extended to the need for better adult safeguarding. The importance of this has been demonstrated by the increase in crimes such as modern slavery and human trafficking, organised immigration crime and county lines.

We found that there were consistent messages from senior NCA leaders that safeguarding was a priority for the agency. Its publications now reflect the emphasis on safeguarding, such as the *Annual plan* and the *National strategic assessment of serious and organised crime*.

But we found that many weekly and quarterly meetings made little or no reference to safeguarding. And there is little evidence that safeguarding forms a meaningful part of the training programme in the NCA's human resources and training plan (People Plan).

We found some evidence at all levels throughout the organisation that the importance of safeguarding was acknowledged. But staff told us that safeguarding was often still seen as secondary to arrests, long sentences and recovering drugs. We understand the primary role and importance of these operational activities in achieving the NCA's objectives. But we believe the value and importance of safeguarding need to be given greater prominence. We noted, for example, that there was no reference to safeguarding or vulnerability in the operational priorities section (page 19) of the NCA's [Annual plan 2020/21](#).

If the NCA wants everyone to consider safeguarding children and vulnerable people to be a priority in their work, the mindset and culture of the organisation need to change.

The child protection and safeguarding team's role isn't well defined. At the time of the inspection, most of the work to meet the NCA's safeguarding aim was being done by this team. To expect the team to achieve the mindset and cultural change required is unrealistic, without more investment. The NCA needs to consider how much it wants to prioritise this safeguarding work, and how much investment may be needed.

Findings: Staff training

This section covers:

- training and professional development;
- organisational learning; and
- staffing levels and recruitment.

Training and professional development

Some safeguarding training is provided to all staff through the iLearn online platform. This training is mandatory and most staff have completed it. The CPAs also host awareness-raising sessions for investigators. We attended several of these sessions, and found them to be informative and engaging. But the information provided is of a relatively basic nature and the supervisor training is no more advanced.

The NCA has introduced more comprehensive training for new recruits, which includes safeguarding. But those already working for the organisation, or on transfer from police forces, won't receive this training. The NCA should consider how it can provide more advanced safeguarding training to those who need it.

The child protection and safeguarding team designed the iLearn packages and provide the face-to-face safeguarding training. This is an extra function of the CPA role and means that the rollout of child safeguarding training is slower and adult safeguarding training hasn't yet started.

Organisational learning

All formal learning and training is recorded in the QAR. These are documented reviews of investigations, which are scrutinised by the department head. There is a QAR form, which includes a section for organisational learning. The organisational standards compliance and accreditation unit gathers the learning and publishes it on the intranet.

The NCA has a wealth of safeguarding experience, including from police forces throughout the UK. For example, modern slavery advisors within the threat leadership directorate often advise investigators, including on how to manage safeguarding. Police forces generally welcome this advice.

However, we didn't find the same for staff within the NCA. We were told that the advice NCA specialist teams gave was valued more externally than by those working within the organisation. For example, we witnessed an occasion when an NCA investigator ignored the advice of a modern slavery tactical advisor. We are unable to

judge if this is a widespread problem. But the NCA needs to reassure itself that it is making best use of its own expertise in safeguarding vulnerable people.

Staffing levels and recruitment

The NCA is struggling to recruit CPAs, who need to be qualified social workers. This is because they would get paid more working for a local authority. Even when someone is recruited, there is a long delay before they can start.

The Government civil service pay policy does limit the freedom the NCA has to increase pay. The role of the CPA in the current safeguarding structure is critical and all avenues need to be exploited to improve pay and conditions, to make the role attractive to the best people.

We have previously commented on how slow the recruitment process was in bringing new recruits into the organisation. The NCA People Strategy describes a seven-month process for large-scale recruitment between advert and the first candidate starting. We found evidence that this generally takes much longer. The NCA must explore opportunities to recruit specialist posts quicker.

We found that the skills of social workers benefit the NCA's ability to work alongside local authority social work organisations. But qualified social workers may not be the only way to bring the necessary skills and abilities into the organisation. The agency may want to consider widening its recruiting approach, based on skills and knowledge rather than purely qualification as a social worker.

Findings: Contribution to national and international partnerships

This section covers:

- working with national bodies; and
- working across international boundaries.

Working with national bodies

The NCA is leading on developing the national law enforcement response to new threats affecting children. It has invested in research to improve the UK-wide response to policing the dark web. It has also developed ways to analyse large amounts of data (bulk data) to identify victims and offenders of child abuse and other serious crimes. This improves the organisation's ability to protect the most vulnerable and safeguard children.

Child abuse

The threat leadership directorate is involved in improving educating young people and parents about how to stay safe online. For example, it produces lesson plans for schools. It has also commissioned academic research to better understand what makes people become abusers.

The child protection and safeguarding team contributes to many national law enforcement and working groups. This includes the:

- NPCC sex working group;
- violence against women and girls senior working group;
- Indirect Victims of Indecent Images of Children advisory board;
- heads of profession working group; and
- victim code implementation group.

This work has practical and operational benefits for the NCA. For example, the agency works with the national working group Indirect Victims of Indecent Images of Children. This group will set national standards and guidance for investigators to help families cope with the stigma of a relative being convicted of a child sexual offence.

Vulnerable adults

The NCA has specialist advisors to help with investigations involving adult vulnerability. These include specialist modern slavery advisors and vulnerable witness advisors. These experts are made available to NCA investigators and police forces. The advisors told us that police forces used their support more than NCA investigators. NCA investigators are also less likely to follow advisors' advice. This is a potential missed opportunity for the NCA. We would encourage investigators to take advantage of the specialist knowledge and skill available on their doorstep.

The vulnerable witness advisors support individual investigations to safeguard vulnerable people. They also contribute to updating the national guidance for obtaining evidence from vulnerable witnesses called [*Achieving Best Evidence in Criminal Proceedings*](#).

We found some examples of how safeguarding in the NCA extended beyond the specialist advisors and those investigating vulnerability. This included the UK Financial Intelligence Unit (UKFIU).

The UKFIU receives and analyses all suspicious activity reports (SARs) from UK banks. It assesses these reports to identify potential safeguarding issues, such as exploitation of older people. It will either circulate the reports to police forces or compare them to similar crimes to identify possible offenders. When there is an immediate risk of harm, the reports can be 'fast-tracked' to the police so they can act.

Where victims are identified throughout many police force areas, the UKFIU will make sure that each force receives a report. This makes sure that safeguarding work isn't delayed.

Last year, the UKFIU processed 740,000 SARs and 'fast-tracked' over 6,000 reports for immediate safeguarding action to protect vulnerable people at risk of exploitation.

Working across international boundaries

The NCA provides the link between UK law enforcement and all other international organisations in this field. We found many examples of good safeguarding work across international boundaries. The NCA has 150 international liaison officers (ILOs) who work in the countries that pose the greatest threat to the UK. The ILOs spend some of their time helping safeguard vulnerable people.

The NCA uses this international network to share information with other law enforcement organisations to safeguard people overseas. It also works with law enforcement in other countries to limit the travel of sex offenders. For example, the NCA has helped Kenyan local law enforcement safeguard 924 people since January 2020. The NCA wants to extend this work to other African nations. It also works with law enforcement in the Philippines and Thailand to safeguard children from abuse through online streaming.

The NCA funds two analysts within the National Center for Missing and Exploited Children (NCMEC) non-profit organisation in the USA. NCMEC receives reports about online abuse on the major US platforms. These reports are passed to the

analysts, who identify UK-based offenders and victims. This process drastically reduces the time between the report being received and UK law enforcement responding. All NCMEC referrals are assessed by the NCA's child sexual exploitation referral bureau.

Findings: Bridging the gap between national activity and local safeguarding

Safeguarding in the UK is generally managed at a local level. This is through local authorities, police chief constables and other safeguarding organisations. The NCA doesn't have a statutory role in these partnerships. But it makes referrals to local authorities when it has concerns for the wellbeing of a child or vulnerable adult.

The NCA's operating procedure for safeguarding referrals provides clear guidance to officers about when and how to submit referrals to local authorities. The child protection and safeguarding team provides advice to NCA officers, and receives and stores all child protection referral forms.

We found examples of where the professional relationship between CPAs and local authority social workers made managing child safeguarding more effective.

The NCA isn't unique in needing to find ways of bridging the gap between operating at a national level and contributing to local safeguarding processes. The British Transport Police (BTP) also operates at a national level. And, like the NCA, the BTP is determined to prioritise safeguarding.

The BTP manages its relationships with local authorities through a central safeguarding hub. All safeguarding referrals are co-ordinated and submitted via this hub. We encourage the NCA to explore the benefits of a similar central safeguarding hub.

Operation Stovewood

Some investigations need the NCA to work more closely with safeguarding organisations. An example of this is Operation Stovewood.

Case study: Operation Stovewood (Rotherham child abuse investigation)

The NCA is carrying out the Operation Stovewood investigation on behalf of South Yorkshire Police. This follows the publication of the Jay report, the independent inquiry into child sexual exploitation in Rotherham. The report concluded that at least 1,400 children were subjected to non-familial abuse in Rotherham between 1997 and 2013.

The investigation is complicated by the fact that in many cases the survivors and suspects have yet to be traced. This means the NCA has to be flexible in how it deals with safeguarding as new survivors and suspects are identified.

The investigation is limited to a small geographic area. And a single local authority, Rotherham Metropolitan Borough Council, manages most of the safeguarding work. Operation Stovewood is a 'relevant party' in the local safeguarding boards and completes a safeguarding assessment for them each year.

The NCA has created a safeguarding and risk management team within Operation Stovewood. This team deals with the scale and complexity of the safeguarding needs of this investigation. The team produces a safeguarding plan for each survivor with complex needs. It will also have developed excellent working relationships with the local safeguarding organisation.

The management team discusses safeguarding at daily meetings and case review meetings. Operational activity is prioritised according to threat, harm and risk.

Operation Stovewood is the only example we found where the NCA used the THRIVE risk assessment model used by police forces in England and Wales. This makes it easier to manage risk between the organisations involved.

Operation Stovewood records its safeguarding policies and decisions effectively, using the HOLMES computer system. HOLMES is a standalone system designed for complex cases, and isn't suitable for all investigations.

The close relationships that Operation Stovewood has with the local safeguarding organisations couldn't be replicated in every UK local authority. But there are examples of good ways of working that the NCA should learn from. These include:

- making safeguarding a central pillar of investigative plans;
- using the ATLAS CM system as a platform for good record keeping; and
- having safeguarding plans for all survivors.

In this inspection, we visited a co-located team of NCA and police officers in the North East Crime Campus, and an organised crime partnership between the NCA and Police Scotland at Gartcosh. We found that these co-located teams led to well-established relationships, and better-managed safeguarding. For example, safeguarding referrals are completed by the right people to the correct standard.

This type of co-location between the NCA and police involved in safeguarding is a good way of working.

Conclusion

The NCA understands the importance of safeguarding and aims for safeguarding to be central to everything it does. In the past two years, the NCA has increased the number of staff investigating child sexual abuse and created high-harm disruption teams.

We were particularly encouraged by the work of the child protection and safeguarding team, and the role of child protection advisors. We found the head of safeguarding's leadership had helped raise the profile of vulnerability and safeguarding throughout the organisation. It has restructured the child protection and safeguarding team to make sure that vulnerability is considered more widely during investigations.

But these teams are heavily focused on protecting children. It is the NCA's aim to improve how it safeguards adults, given its central role in dealing with crimes such as modern slavery. In some parts of the NCA, the focus of investigating serious organised crime, recovering drugs and firearms, and arresting people is in stark contrast to its aim of making safeguarding a primary focus.

The child protection specialists in the NCA bear the greatest burden for achieving this aim. They are responsible for writing and implementing the safeguarding plans, policies and training, and providing operational advice. They are a small team of professional, committed and enthusiastic people. But it isn't reasonable to expect them to develop the safeguarding capability and change the workforce's mindset to sufficiently achieve the objective.

The NCA has a difficult decision to make. Will it invest more in central safeguarding expertise and, in doing so, centralise the responsibility for safeguarding? Or invest in measures to make safeguarding the responsibility of everyone? This would require an extensive training, awareness and communications programme.

We have made one recommendation to improve the effectiveness of safeguarding in the NCA.

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