

**Swyddfa Comisiynydd yr Heddlu a Throseddu, Gwent**  
**Office of Police and Crime Commissioner, Gwent**

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Comisiynydd Heddlu a Throseddu Gwent | Police and Crime Commissioner for Gwent:

**Jeff Cuthbert B.Sc., MCIPD**



The Rt Hon Priti Patel MP  
Home Secretary  
Home Office  
2 Marsham Street  
LONDON  
SW1P 4DF

21<sup>st</sup> April 2020

Dear Home Secretary

**National Child Protection Inspections – 2019 Thematic Report**

As required by statute, I am writing to you to respond, from a Gwent perspective, to the recommendations contained within the HMICFRS National Child Protection Inspections 2019 Thematic Report.

I welcome this national report from HMICFRS and am pleased to note the improvements across policing since the last thematic report was published in 2015. Protecting the most vulnerable in our communities is a priority, both for my office and for Gwent Police; this is evidenced by the focus within my Police and Crime Plan on protecting children and young people.

I am proud of the on-going work in Gwent to build on the practices already in place to safeguard children from abuse, exploitation and harm, including the implementation of Operation Encompass to support children experiencing domestic abuse. Another positive initiative is our Multi-Agency Safeguarding Hub, which brings partners together to safeguard and protect the most vulnerable in our society. My office is also facilitating, in partnership with Newport City Council, a study to examine the correlation between educational attainment and engagement in criminality and exploitation. Once finalised, this will also be shared with the four other local authority areas in Gwent.

I am also pleased to inform you that my office has been successful in accessing funding from the Home Office for a project to tackle Serious and Organised Crime (SOC) in Newport and an all Wales Serious Violence Prevention Project (SVPP). Recognising the importance of this area of work, I also provided additional funding for the projects of just over £126,000 during 2019/20. For 2020/21, I have allocated £330,000 to continue funding the final pilot year of the SOC and SVPP project. Both projects work with agencies which provide support to children who are already involved in drugs supply and related serious violence as well as providing a school education

programme that aims to prevent children from getting involved in criminality in the first instance. Also, one of the agencies involved in the projects provides support through peer mentoring to children known to social services and who are at significant risk of harm.

As mentioned in your report, in Wales, we are extremely lucky to be part of the Adverse Childhood Experiences (ACEs) programme which provides early intervention to those experiencing stressful events during childhood. The project was initially funded by the Home Office until the end of the 2019/20 financial year with further funding provided jointly by my office and Gwent Police for the 2020/21 financial year, in order to fully assess how successful the project has been.

Please find below updates on the three recommendations for Chief Constables' contained in the report:

**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.**

*Gwent Police has made significant steps in reducing the unnecessary criminalisation of children and also the impact on children and young people who find themselves engaged with Gwent Police. The Gwent Early Action Together programme has drawn on evidence around ACEs and the life-long impact the associated trauma of ACEs can have. The programme continues to develop a multi-agency collaborative approach to improve the identification of risk and vulnerability, prevent escalation and reduce repeat demand. This has involved the training of over 1,200 officers and staff within Gwent Police and over 500 people from partner agencies in trauma informed practice, recognising vulnerability in children, the impact on their behaviour and the opportunity and ability to work with children to divert them away from crime and health harming behaviours. This training is embedded within the Police Education Qualification Framework programme for new recruits and a vulnerability workforce development programme is being developed and has included the recruitment of a dedicated Vulnerability Trainer for the Force.*

*Gwent Police is also currently piloting the introduction of a Senior Social worker within the Force Control Room to support officers dealing with vulnerable children at incidents or when entering custody. This ensures the right intervention is available for the child which in turn has a positive effect on the child's future.*

*Within Gwent we have a Serious and Organised Crime Coordinator role which has brought together a wide and diverse multi agency group to tackle organised crime in the Newport area with a focus on deterring children and young people from being drawn into organised criminality.*

*Through the partnership:*

- *Barnardo's Cymru has been commissioned to deliver an education package in five of the most challenging secondary schools in Newport. The package is delivered to the overall school population and focuses on the implications of crime and becoming involved in organised criminality.*
- *CrimeStoppers are working with The St Giles Trust to deliver a programme to cohorts of children at KS3 and KS4 focussing on the detrimental impact of becoming involved in criminality.*
- *The St Giles Trust has been commissioned to work with individual children and smaller cohorts of children who are already involved in criminality and organised crime. The aim is to help them overcome barriers and get the support they need to move forward*

*with their lives. At point of Police enforcement, bring the partnership together to provide bespoke support to children involved in organised crime and jointly assess what alternatives to the criminal justice process are available and will most positively affect a child's future. Further to this, enforcement operations have mechanisms in place to safeguard children living with adult offenders or who may be adversely impacted. This approach has been pioneered by the Home Office as best practice across the country.*

*In the last 12 months, significant work has been undertaken to make changes to the experience of children who find themselves in custody. Work has been progressed with Local Authorities and the Youth Offending Services regarding the availability and expediting attendance of Appropriate Adults at custody units, significantly reducing the amount of time a child spends within the custody environment. Custody staff undertaking custody reviews have received training on managing children in custody and the impact it has on them. Since this work has taken place there has been a reduction in the number of children entering custody, the length of time a child spends in custody and the detention of children in custody post charge.*

*Referrals to the Local Authority for all children in custody are now mandatory. Through the Force training day all front line constables and sergeants have received an awareness session on Child Criminal Exploitation with a focus on County Lines but encompassing wider exploitation such as Child Sexual Exploitation. This has involved reinforcement of the National Referral Mechanism and Defence under Section 45 of the Modern Slavery Act.*

**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.**

*Gwent Police, in conjunction with my office, has recently developed a performance framework that examines all aspects of service delivery; the force has also introduced a series of dip sampling that relates specifically to decision making on safeguarding. Gwent Police recognises that the vast majority of safeguarding decisions are made within a central referral unit and within the co-located safeguarding hubs and it is here that focus has been placed. Each month there are a series of randomly selected cases examined where the risk grading is reviewed to establish if the appropriate information was been obtained before any decisions were made. This ensures that legal considerations and sound judgement are being applied to the recorded outcomes. This process is accompanied by a reviewed policy document that allows for professionals working within this environment to apply their judgement more readily and to be supported when doing so.*

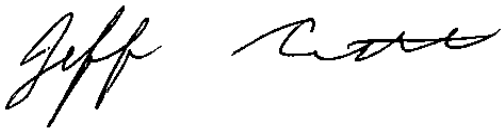
**We recommend that chief constables on those forces not yet inspected by the NCPI or JTAI take steps to identify and implement good practice and the learning highlighted from these programmes. This may include engaging with those forces who have been inspected, direct contact with the HMICFRS child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

*Gwent Police was subject to a child protection inspection in February 2019. Even though this recommendation does not require a direct response, both the Chief Constable and I would be willing to engage with any forces who are yet to undergo their inspection in order to share best practice and lessons learnt.*

The protection of children is one of the most important roles that the police service undertakes and I will continue to support the Chief Constable to ensure further progress is made against the national recommendations identified by the inspectorate. However, we cannot do this alone and

will continue to work with our partner agencies to do our utmost to protect all children, but especially those who are at risk of abuse and exploitation.

Yours sincerely

A handwritten signature in black ink, appearing to read "Jeff Cuthbert". The signature is written in a cursive, flowing style.

**Jeff Cuthbert B.Sc., MCIPD**  
**Police and Crime Commissioner for Gwent**