



OPCC

Office of the Police &
Crime Commissioner
for Gloucestershire

20th September 2022

Response to Criminal Justice Joint Inspection- A thematic inspection of Multi-Agency Public Protection Arrangements.

The attached HMICFRS report relates to the thematic inspection of six police forces and their respective Multi-Agency Public Protection Arrangements, however, Gloucestershire Constabulary was not included within this cohort. The report makes various recommendations based on this inspection which have been duly considered by the Gloucestershire Constabulary and an action plan prepared.

I am happy with the response from the Constabulary and will monitor their plan accordingly.

Chris Nelson
Police and Crime Commissioner

Gloucestershire Constabulary

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Mr Richard Bradley
Chief Executive
Office Police and Crime Commissioner –
Gloucestershire

Our Ref: RO RB 02092022
Email: Richard.Ocone@gloucestershire.police.uk
Date: 02 September 2022

Dear Richard

Re: Criminal Justice Joint Inspection - A thematic inspection of Multi-Agency Public Protection Arrangements

Please find below our response to the above report, aimed at assisting you to meet the requirements of Section 55(1) of the Police Act 1996. The report is a national report and Gloucestershire Constabulary was not one of the six forces inspected.

This publication is a review of Multi-Agency Public Protection Arrangements (MAPPA) that have been in place for over 20 years. The report concluded that for cases managed at Levels 2 and 3, MAPPA largely achieves its aims of managing the risks that violent and sexual offenders pose to the public; for Level 1 cases (the lowest level), further improvements are needed.

There are a number of recommendations for various agencies, with four that relate to the police service, an assessment of Force activity has been included in the table below. The recommendations for other agencies have been included for reference, however do not require individual forces to implement changes at this time, and the outcome will be monitored for any subsequent impact.

Please do not hesitate to contact me should you require any further information.

Yours sincerely

Richard Ocone

T/Assistant Chief Constable 252434

Operations

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Twenty years on, is MAPPa achieving its objectives?

A CJI joint thematic inspection of Multi-Agency Public Protection Arrangements

Recommendations	Owner	Timescale	Progress
<p>The Probation Service, police forces, and prisons should ensure that:</p> <p>Recommendation 14</p> <p>Category 3 referrals are made to manage individuals who present a high risk of domestic abuse where formal multi-agency management and oversight through MAPPa would add value to the risk management plan</p>	<p>Probation, Police forces and Prisons</p>	<p>Within 12 months</p>	<p>The Constabulary has processes in place for Category 3 referrals to be made to MAPPa, which are detailed on the Force intranet. Domestic abuse allegations are investigated by staff working across various departments, including the Local Policing Areas (LPAs), the Local Policing Investigations Hub (LPIH) and Criminal Investigation Department (CID) and receive additional safeguarding advice and support through the Domestic Abuse Safeguarding Team. Analysis is conducted to identify the top 5 Domestic abuse perpetrators and top 10 perpetrators for Violence and Intimidation against Women & Girls (VIAWG) with corresponding management plans which can include a MAPPa referral and/or direction to seek advice from the relevant offender managers.</p> <p>As identified in the HMICFRS report, following updated MAPPa guidance, there is a clear benefit to providing refresher training to all staff investigating domestic abuse offences involving high risk offenders, so that staff are aware of the process and the necessary criteria for a category 3 MAPPa referral. As an interim measure, the MAPPa section of the Force intranet site is being updated to allow officers/staff to self-brief.</p>

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Recommendations	Owner	Timescale	Progress
<p>Recommendation 15</p> <p>There is a comprehensive training strategy for all staff involved in the MAPPA process that fully utilises existing training packages and makes sure they can enable staff in all roles to prepare for and present or contribute to a case in a multi-agency forum and understand how MAPPA fits with other multi-agency forums, such as Integrated Offender Management and Multi-Agency Risk Assessment Conferences (MARACs).</p>	Police forces	Within 12 months	The Constabulary have ensured that there is a training strategy in place for all staff involved in the MAPPA process, which has been arranged and overseen through the MAPPA Strategic Management Board Training plan. The training plan will require review in light of this publication and MAPPA guidance updates to ensure it remains relevant and 'fit for purpose'.
<p>Police forces should ensure that:</p> <p>Recommendation 18</p> <p>All MAPPA nominals managed at Levels 2 and 3 are allocated to a suitably trained police offender manager</p>	Police forces	Within 12 months	All category 1 registered sex offenders being managed at level 2 and 3 have a suitably trained Management of Sexual Offenders and Violent Offenders (MOSOVO) team offender manager allocated to them. Not all category 2 violent offenders and sexual offenders who are managed at level 2 and 3 have trained police offender managers due to resourcing issues in the MOSOVO Team (as identified in our FMS4), however they are still subject to review and risk assessment pending any change in the intelligence picture. If the category 2 offender is also managed under IOM then they will have an IOM offender manager assigned to them. There is representation by police at meetings for all MAPPA nominals managed at level 2 & 3 by the MOSOVO Detective Inspector, Adult Safeguarding Detective Chief Inspector and/or the Detective Superintendent, head of Public Protection, with any police actions allocated and actioned accordingly.

Recommendations	Owner	Timescale	Progress
<p>Recommendation 19</p> <p>Workloads for staff managing sexual offenders are reviewed against national expectations and, where found to be excessive, take steps for mitigation and communicate this to affected staff.</p>			<p>The Constabulary's Executive Board know and understand that staff working in the MOSOVO team are managing cohorts significantly greater than the recommended national guidance of 50 offenders to every one offender manager, which has correspondingly been reflected in this year's Force Management Statement (FMS). There has not been an increase in posts for Offender Managers (OM) working in MOSOVO since 2013, however the number of registered sex offenders requiring management has continued to increase year on year.</p> <p>To provide some assistance, the unit has invested in two specialist Digital Media Police Staff Investigators (PSIs) to support the OMs in managing nominals involved in online/internet offending or who are particularly tech savvy.</p> <p>The MOSOVO staff are also currently working outside of national guidance in elements of their work such as reactive management & double crewing. The Senior Leadership Team (SLT) are aware and the team continue to look at ways to mitigate the risks such as utilising other police resources, for example from the Neighbourhood Policing Team (NPT) to support with home visits.</p> <p>The staff are fully updated by the MOSOVO DI through updates from PPU SLT, Regional MOSOVO meetings. The DI has a Team Meeting every six weeks with staff and workloads are discussed as a standing agenda item, as is wellbeing.</p>



Recommendations for other agencies:

Recommendations should be completed within 12 months.

Her Majesty's Prison and Probation Service Public Protection Group should:

1. Amend guidance to require that all MAPPA nominals have a record created in the nominated shared multi-agency database (currently ViSOR, being replaced by MAPPS, multi-agency public protection system)
2. Review the MAPPA meeting agenda aide-memoire to include a prompt to hear contributions from the individual who is the subject of the MAPPA meeting
3. Collate audit and quality assurance information from strategic management boards and provide national analysis reports to highlight inconsistency and promote more consistent level setting.

The MAPPA Responsible Authority National Steering Group should:

4. Develop a self-assessment that strategic management boards can use to review their arrangements to promote consistency and best practice, and ensure that sufficient resources are available to carry out necessary MAPPA work
5. Review the MAPPA guidance to extend the range of permitted rank of police SMB chairs.

Strategic management boards should:

6. Convene task-and-finish groups to review the resources available for MAPPA in their area to ensure sufficient staffing is available to screen referrals, plan and chair meetings, and deliver accurate meeting minutes promptly

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7. Analyse local referral data at least twice yearly to ensure that all appropriate cases are referred into MAPPA, and that there is a focus on diversity and disproportionality within the MAPPA cohort
 8. Ensure that screening practice in their area accepts that multi-agency oversight of complex cases is a valid and necessary reason for cases to be adopted at Levels 2 and 3
 9. Implement a standing panel for MAPPA Level 2 and 3 meetings with, as a minimum, appropriate representation from responsible authority agencies, children's social care services, mental health services and local authority housing services to ensure there is appropriate knowledge and expertise at each meeting to support risk management
 10. Provide twice yearly quality assurance and audit of MAPPA cases, including Level 1 cases and rejected referrals to Level 2 and 3, to drive good practice, ensure that all appropriate cases are referred, and develop the skills of MAPPA chairs.

The Probation Service should ensure that:

11. MAPPA level setting for custody and community cases is timely, taking into consideration the earliest possible date of release and any temporary releases, and be fully informed by information from all relevant agencies in all cases.

The Probation Service and prisons should ensure that:

12. All Level 1 cases have sufficient management oversight and there is an appropriate focus on information exchange with other agencies to inform risk assessment and review
13. The ViSOR records for all MAPPA nominals are updated to provide a complete picture of all relevant risk information.

The Probation Service, police forces, and prisons should ensure that:

14. See table above - Category 3 referrals are made to manage individuals who present a high risk of domestic abuse where formal multi-agency management and oversight through MAPPA would add value to the risk management plan
15. See table above - There is a comprehensive training strategy for all staff involved in the MAPPA process that fully utilises existing training packages and makes sure they can enable staff in all roles to prepare for and present or contribute to a case in a multi-agency forum and understand how MAPPA fits with other multi-agency forums, such as Integrated Offender Management and Multi-Agency Risk Assessment Conferences (MARACs).

Prisons should ensure that:

17. The application of public protection processes in prison, including the monitoring of communications, should be robust to enable defensible decisions to be made about the management of prisoners using MAPPA
18. The offender management unit should be fully resourced and trained to deliver effective MAPPA work in prisons.

Police forces should ensure that:

19. See table above - All MAPPA nominals managed at Levels 2 and 3 are allocated to a suitably trained police offender manager
20. See table above - Workloads for staff managing sexual offenders are reviewed against national expectations and, where found to be excessive, take steps for mitigation and communicate this to affected staff.

Ends/.