

FOLLOW-UP REVIEW

CHILD SEXUAL EXPLOITATION IN NORTHERN IRELAND:

AN INSPECTION OF THE CRIMINAL JUSTICE SYSTEM'S RESPONSE

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December 2025

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Note: Electronic links to documents and information sources referenced within this report are correct at the time of publication but may be subject to change where the information is outside CJI's control.

LIST OF ABBREVIATIONS

FOLLOW-UP REVIEW CHILD SEXUAL EXPLOITATION IN NORTHERN IRELAND: AN INSPECTION OF THE CRIMINAL JUSTICE SYSTEM'S RESPONSE DECEMBER 2025

| CCE | Child Criminal Exploitation | |
|--------|--|--|
| ChISVA | Children's Independent Sexual Violence Advisor | |
| CJI | Criminal Justice Inspection Northern Ireland | |
| CPSOG | Child Protection Senior Officials Group | |
| CRU | Central Referral Unit | |
| CSE | Child Sexual Exploitation | |
| CSOLA | Children's Sexual Offences Legal Advisor | |
| DE | Department of Education | |
| DoH | Department of Health | |
| DoJ | Department of Justice | |
| EA | Education Authority | |
| ETI | Education and Training Inspectorate | |
| HSCT | Health and Social Care Trust | |
| JICPA | Joint Inspection of Child Protection Arrangements | |
| NICTS | Northern Ireland Courts and Tribunals Service | |
| NPCC | National Police Chiefs' Council | |
| NRM | National Referral Mechanism | |
| NSPCC | National Society for the Prevention of Cruelty to Children | |
| PBNI | Probation Board for Northern Ireland | |
| PPB | Public Protection Branch (in the PSNI) | |
| PPS | Public Prosecution Service for Northern Ireland | |
| PSNI | Police Service of Northern Ireland | |
| | | |

| RoSHO(s) | Risk of Sexual Harm Order(s) | |
|----------|---|--|
| RQIA | Regulation and Quality Improvement Authority | |
| SBNI | Safeguarding Board for Northern Ireland | |
| SCU | Serious Crime Unit (in the PPS) | |
| SPPG | Strategic Planning and Performance Group (within DoH, formerly Health and Social Care Board (HSCB) | |
| UK | United Kingdom | |
| UN | United Nations | |
| UNCRC | United Nations Convention on the Rights of the Child | |
| YJA | Youth Justice Agency | |
| | | |

Terms used: as far as possible we have limited use of the term 'CSE' and 'CCE' to when it is used to denote a job role, a team or document title, or to when it is used within quotations or information provided for the Follow-Up Review.

CHIEF INSPECTOR'S FOREWORD

Child sexual exploitation is not a lifestyle choice for children who go missing or a storyline in a popular television police drama. It is child abuse and it is happening in our community; and while the criminal justice system is more aware of what it is, we still have much to do to protect children and disrupt offenders.

In the five years since the CJI Inspection Report on Child Sexual Exploitation, progress has been made to implement accepted recommendations but there are still significant gaps between partially and achieved recommendations.

We need to ensure the criminal justice system's collective response to child sexual exploitation in our community and the outcomes it achieves are well known and understood. Abusers benefit from the system not being resourced and as effective as it should be to enable their offending.

A more cohesive criminal justice response needs to inform the cross-Departmental and delivery organisation efforts to create the Safer Communities aspired to in the Programme for Government and protect our children from harm.

I was concerned that the strategic governance arrangements to monitor and oversee the collective response to child sexual exploitation had changed with child safeguarding and protection considered as necessary and issues reported to the cross-Departmental Children and Young Persons Strategy Monitoring and Reporting Board in exceptional circumstances only.

I believe child safeguarding and protection should be a standing item with regular and effective collaborative and collective oversight by all relevant officials at the most senior levels.

I was also concerned at the depletion of resources from the Police Service of Northern Ireland's Public Protection Branch. Its dedicated Officers do complex and harrowing work; and while I respect that the deployment of Officers is an operational decision for the Chief Constable, at the time of fieldwork it was running on 25% of the Constable resources it was supposed to have in a high harm, high risk area of child abuse response and investigation. If a victim focus doesn't apply to child sex abuse victims, it is hard to see where it does.

The case file reviews were an important part of our evidence gathering and showed that children, whether in care or not, were not being considered as children first, children at risk and children who needed a robust child safeguarding and protection response.

Being over the age of consent does not mean you are not a child who is being sexually exploited.

After the 2020 Inspection, we carried out a pilot Joint Inspection of Child Protection Arrangements in a Health and Social Care Trust with Regulation and Quality Improvement Authority and Education and Training Improvement Inspectorate colleagues. I am grateful to the Chief Executive and Chief Inspector and their Inspectors for having the courage, patience and commitment to partner with us on it. We felt it was important to do together what we ask of others; to work together to improve outcomes for children.

Since then, the Review of Children's Services by Professor Ray Jones made a number of recommendations that are still under consideration. Work being taken forward includes options for a Multi-Agency Front Door approach that must provide a child-centred response to victims of exploitation and abuse. I look forward to exploring how we develop a joint inspectorate framework to support oversight of the new model and contribute to improving the child safeguarding and protection response.

This Follow-Up Review was carried out in tandem with the ongoing Inspection of Child Criminal Exploitation that I hope to report on in the New Year. There are obvious parallels between the two and we know that children who are sexually exploited can be exploited in other ways too. However, it was important that the Inspection Teams avoided duplication with the inspected organisations and maximised the use of their time.

I am grateful to the Police Service of Northern Ireland, Public Prosecution Service for Northern Ireland, Probation Board for Northern Ireland, Youth Justice Agency, Northern Ireland Courts and Tribunals Service and the Department of Justice for the provision of information and engaging with Inspectors during this Follow-Up Review.

My thanks to Dr Roisin Devlin, Lead Inspector and Inspectors Muireann Bohill and Maureen Erne who completed this Follow-Up Review, and to the Inspectors from His Majesty's Inspectorate of Constabulary and Fire & Rescue Services who worked with them and supported the case file review.

Jacqui Durkin

Chief Inspector of Criminal Justice in Northern Ireland

December 2025





CHAPTER 1: INTRODUCTION

BACKGROUND TO THE FOLLOW-UP REVIEW

In 2020 Criminal Justice Inspection Northern Ireland (CJI) published its Inspection Report (the 2020 Inspection Report) of the criminal justice system's response to child sexual exploitation (CSE).¹ It reported concerns about the identification and protection of children at risk and a lack of strategic knowledge about how successfully child sexual exploitation was being tackled, including through prosecutions. Two Strategic and seven Operational recommendations were made to improve the strategic response and understanding of the nature and scale of child sexual exploitation in Northern Ireland, and for criminal justice organisations to enhance policies, training and quality assurance. The Police Service of Northern Ireland (PSNI) was also urged to ensure a model of responding to child sexual exploitation that was adequately supervised and resourced.

The Department of Justice (DoJ) had led on the development and monitoring of an Action Plan to co-ordinate the implementation of the CJI recommendations across the criminal justice organisations. Oversight arrangements through a subgroup of the cross-Departmental Child Protection Senior Officials Group (CPSOG), the restructuring of the PSNI Public Protection Branch (PPB) team tasked with overseeing the PSNI's response, and guidance to improve consideration of child sexual exploitation in prosecutorial decisions, were among some of the key actions identified.

CHANGES SINCE THE 2020 INSPECTION REPORT

Across the United Kingdom (UK) multiple reports, investigations and inquiries both before and since the CJI 2020 Inspection Report have sought to improve how child sexual exploitation is tackled. Better information sharing, inter-agency working, embedding the voice of the child, avoidance of victim blaming and greater focus on bringing perpetrators to justice had been invariably urged. Improved data collection was also highlighted to understand how successfully children were being protected and perpetrators prosecuted. The most recent report was commissioned by the UK Government and completed by Baroness Casey in June 2025. It focused on sexual exploitation committed against children by groups across England.² Noting that reviews, recommendations and strategies raised the same issues repeatedly, it reported:

¹ CJI, Child Sexual Exploitation in Northern Ireland: An Inspection of the Criminal Justice System's Response, June 2020 available at https://www.cjini.org/reports/child-sexual-exploitation-in-northern-ireland/

National Audit on Group-based Child Sexual Exploitation and Abuse, Baroness Casey of Blackstock DBE CB, June 2025 available at https://www.gov.uk/government/publications/national-audit-on-group-based-child-sexual-exploitation-and-abuse

The policy and delivery landscape for child sexual abuse and exploitation is spread across government departments and statutory bodies and therefore requires strong leadership, common purpose and above all a grip on the policy. But what emerges instead over at least the last decade is a repeating cycle: seminal moments of scandal and public outrage which lead to bursts of government focus and activity but no sustained improvement, leaving victims and the public with insufficient justice, action, accountability or answers.'

All 12 recommendations were accepted by the UK Government with actions including support for the National Crime Agency and the Police to launch a national criminal operation into group-based sexual exploitation of children. There would also be a national inquiry for a series of targeted investigations in local areas in England to hold institutions to account for failures in responding to group-based child sexual exploitation, and legislative change to ensure against cases being dropped or downgraded where victims aged 13 to 15 were deemed 'in love with' or 'consented to' sex with the perpetrator. This had been similar to a legislative issue the DoJ was asked to review by Kathleen Marshall following her inquiry into child sexual exploitation in Northern Ireland in 2014.³

In its most recent examination of the UK's performance against the United Nations Convention on the Rights of the Child (UNCRC), the United Nations Committee (the Committee) recognised the many national and local reports that had made recommendations to tackle the sexual abuse of children and urged for implementation.⁴ The insufficiency of measures to investigate crimes including cases of sexual exploitation, to bring perpetrators to justice, and to resource related services for child victims was highlighted. Many of the Committee's recommendations echoed what it and local reports had already stated and it was disappointing that these required repeating. The UNCRC had nevertheless provided a mandate for the Northern Ireland Executive, its Departments and criminal justice organisations to act.

Recommendations across the range of rights and obligations that the UNCRC contained were made. Strengthening measures aimed at ensuring identification and referral of child victims of trafficking to appropriate child friendly services, and to investigate all such cases using multi-disciplinary and child-sensitive proceedings and bringing perpetrators to justice, was urged. The Committee also made findings relating to children in alternative care and called for sufficient resources to implement the Independent Review of Children's Social Care Services.⁵

³ See Key Recommendation 14, Marshall, K., Child Sexual Exploitation in Northern Ireland: Report of the Independent Inquiry, November 2014 available at https://www.health-ni.gov.uk/publications/marshall-report

⁴ Committee on the Rights of the Child, Concluding Observations on the combined sixth and seventh periodic reports of the United Kingdom of Great Britain and Northern Ireland, 22 June 2023 available at https://digitallibrary.un.org/record/4013807?ln=en&v=pdf

The Report of the Independent Review of Northern Ireland's Children's Social Care Services, Professor Ray Jones, June 2023, available at https://www.cscsreviewni.net/publications/report-independent-review-childrens-social-care-services-northern-ireland.

Recommendations applicable across the UK related specifically to protecting children from abuse, neglect and sexual exploitation included (summarising):

- ensuring child protection systems take a child-rights based approach to preventing and addressing abuse;
- promptly and effectively investigate and intervene in all environments where abuse including sexual exploitation occurs ensuring expert support to child victims and perpetrators brought to justice;
- implement recommendations from relevant reports, investigations and inquiries including the Gillen Report;⁶
- access to comprehensive child-sensitive interventions and support, video recorded evidence and cross-examination during the pretrial process as a default;
- strengthen training for professionals; and
- ensure systemic data collection and analysis to inform strategy on combating violence and child sexual abuse including by:
 - creating a national database for missing children;
 - collecting data on cases that have been reported, investigated and prosecuted; and
 - ensuring 16 and 17-year-olds are considered children in disaggregation of data on sexual exploitation and abuse.⁷

While knowledge about the nature and scale of child sexual exploitation was evolving, data gaps continued to hinder the strategic response to child sexual abuse and exploitation. The Centre of Expertise on Child Sexual Abuse analysed trends in official data relating to child sexual abuse in England and Wales.⁸ It mapped local authority child protection data, police recorded crime statistics, relevant Crown Prosecution Service decisions, Court proceedings, and Sexual Assault Referral Centre figures. It continued to call for improvements in data collection noting in particular '[...] very limited data available regarding the experience of victims of child sexual abuse offences within the criminal justice system: for example, the extent to which their rights within the Victims' Code (Ministry of Justice, 2020) are met.' While there had been notable efforts by public bodies to improve, it was clear that the information collected had not included '[...] any measure of those responses' effectiveness in protecting children.'

No such publication included Northern Ireland. However, the National Society for the Prevention of Cruelty to Children (NSPCC) research on child sexual abuse statistics included Northern Ireland where relevant data was available. It had collated Child Protection Registrations, crime surveys using self-reported prevalence rates, and police statistics.

⁶ Gillen Review Report into the law and procedures in serious sexual offences in Northern Ireland, May 2019 available at <a href="https://www.justice-ni.gov.uk/publications/gillen-review-report-law-and-procedures-serious-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-serious-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-serious-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-serious-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-serious-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-serious-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-serious-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-serious-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-serious-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-serious-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-sexual-offences-ni.gov.uk/publications/gillen-review-report-law-and-procedures-ni.gov.uk/publications/gillen-review-report-law-and-procedures-ni.gov.uk/publications/gillen-review-report-law-and-procedures-ni.gov.uk/publications/gillen-review-report-law-and-procedures-ni.gov.uk/publications/gillen-review-report-law-and-procedures-ni.gov.uk/publications/gillen-review-report-law-and-procedures-ni.gov.uk/publications/gillen-review-report-law-and-procedures-ni.gov.uk/publications/gillen-review-review-review-review-review-review-review-review-review-review-review-r

⁷ While this was a UK-wide recommendation, the PSNI published statistics on Child Sexual Abuse had included 16 and 17 year olds.

Karsna, K., and Bromley, P., Centre of Expertise on Child Sexual Abuse: Child Sexual Abuse in 2022-23: Trends in official data, February 2024 available at https://www.csacentre.org.uk/app/uploads/2024/02/Trends-in-Offical-Data-2022-23-FINAL.pdf

⁹ NSPCC, Child Sexual Abuse: Statistics briefing, January 2025 available at https://learning.nspcc.org.uk/research-resources/statistics-briefings/child-sexual-abuse#tooltip_content39655.

The PSNI was the only Police Service or Constabulary across the UK to have published data on the number of sexual offences perpetrated against victims under 18 years of age. It showed over half of recorded sexual offences in Northern Ireland were perpetrated against children.

Table 1.1: Police recorded sexual offences against children - from NSPCC statistics briefing: Child sexual abuse.¹⁰

| | Number of sexual offences against children (2023-24) | Rate of sexual offences per 10,000 children (2023-24) | Proportion of all sexual offences that are against children (2023-24) |
|---|--|---|--|
| England (offences against under 16s) | 56,674 | 53.2 | 32% |
| Northern Ireland (offences against under 18s) | 2,242 | 51.3 | 55% |
| Scotland (offences against under 16s) | 3,570 | 39.9 | 25% |
| Wales (offences against under 16s) | 3,523 | 64.2 | 37% |

(Sources: Home Office, 2024;¹¹ PSNI, 2024;¹² Scottish Government, 2024¹³)

Police in England and Wales flagged an offence if it involved sexual exploitation of a child under the age of 18. Statistics for the year ending March 2024 showed that they had flagged 15,604 offences as child sexual exploitation. Equivalent data was not available for Northern Ireland or Scotland.

The National Referral Mechanism (NRM) provided a further measure of child sexual abuse. Figures from across the UK showed 1,119 (15%) of the children referred were believed to have been trafficked for sexual exploitation, or multiple forms of exploitation including sexual exploitation. The exploitation type of 997 (13%) children was unknown. The number of children, particularly UK national children, referred to the NRM from Northern Ireland had been historically low and this continued to be the case. Analysis by the International Office of Migration showed 14 UK national children referred to the NRM in Northern Ireland since 2015 compared to 16,691 in England, 1,257 in Wales and 214 in Scotland.¹⁴

¹⁰ Ibid

¹¹ Home Office, Police recorded crime and outcomes data tables, 2024 available at https://www.gov.uk/government/statistics/police-recorded-crime-open-data-tables.

¹² PSNI, Annual trends in police recorded crime 1998-99 to 2023-24 available at https://www.psni.police.uk/about-us/our-publications-and-reports/official-statistics/police-recorded-crime-statistics.

¹³ Scottish Government, Recorded crime in Scotland 2023-24 available at https://www.gov.scot/publications/recorded-crime-scotland-2023-24/.

¹⁴ International Office of Migration UN Migration, UK National Referral Mechanism: Northern Ireland NRM Data Analysis Briefing 2023 Annual Review available at https://unitedkingdom.iom.int/sites/g/files/tmzbdl1381/files/documents/2024-04/iom_uk_ni-nrm-annual-review-2023.pdf.

It noted that, '[all] UK children identified in Northern Ireland are female, with 12 referred to the NRM reporting sexual exploitation and two reporting labour exploitation.'

There had been a trend in Northern Ireland whereby most individuals referred to the NRM reported exploitation taking place 'overseas.' This prompted the authors to state that 'the underrepresentation of UK and Irish nationals in the NRM data for Northern Ireland is particularly notable and could suggest a lack of awareness amongst stakeholders that UK and Irish nationals can also be victims of modern slavery, and limited knowledge of the indicators to look out for in relation to identifying exploitation among this population.' Raising awareness of modern slavery in Northern Ireland and examining reasons for lower NRM submission rates by the PSNI compared to other UK police forces were among issues identified in the 2020 CJI Modern Slavery and Human Trafficking Inspection. ¹⁵ Uncertainty about the signs of human trafficking was also highlighted by the CJI 2020 Police Custody Inspection. ¹⁶

The PSNI data on recorded crime trends in Northern Ireland¹⁷ showed that:

- the number of sexual offences recorded where the victim was under 18 years of age at the time the offence was committed more than doubled between 2007-08 and 2023-24, from 934 to 2,242;
- offences relating to sexual activity where the victim was under 16 years of age trebled between the introduction of new sexual offence legislation in February 2009 and the peak of 618 offences recorded in 2016-17;
- 2023-24 recorded the second highest level of such offences at 599; and
- close to one third of the sexual offences recorded during 2023-24 were reported to police when the victim was an adult (aged 18 and over) but occurred when the victim was a child (aged under 18).

The PSNI's 2025-2030 Policing Plan included 'Outcome 1: PSNI is victim focused with an indicator to examine the effectiveness in tackling child criminal exploitation'. In recognition of the generally increasing trend in recorded sexual offences against children, child sexual exploitation was included within the reporting expectations for the PSNI. Baselines were 'Trends and levels of crimes with child victims compared to 5-year average;' and '...sexual crimes with child victims compared to 5-year average.' Relevant measures of the response to sexual exploitation were the:

- number of child victims at risk of child sexual exploitation and number of children no longer deemed at risk;
- number of Persons of Concern suspected of posing a risk to children;
- number of intelligence referrals received by the Child Internet Protection Team; and
- number of child referrals for human trafficking from the NRM.
- 15 CJI, Modern Slavery and Human Trafficking: An inspection of how the criminal justice system deals with Modern Slavery and Human Trafficking in Northern Ireland, October 2020 available at https://www.cjini.org/reports/an-inspection-of-how-the-criminal-justice-system-deals-with-modern-slavery-and-human-trafficking-in-northern-ireland/.
- 16 CJI and RQIA, Police Custody: The detention of persons in police custody in Northern Ireland, September 2020 available at https://www.cjini.org/reports/the-detention-of-persons-in-police-custody-in-northern-ireland-2/#introduction.
- 17 PSNI, Trends in police recorded crime in Northern Ireland 1998-99 to 2023-24 available at https://www.psni.police.uk/system/files/2025-01/371647988/Police%20Recorded%20Crime%20in%20Northern%20Ireland%201998-99%20to%202023-220revised.pdf.

The PSNI's previous five-year Policing Plan had included a focus on tackling child sexual abuse and exploitation within its indicator for fewer repeat victims. Whereas the Northern Ireland Policing Board's 2024 annual assessment marked this as 'Partially Achieved,' it was recorded 'Achieved' in the PSNI's 2023-24 Annual Report. It noted 'there has been an overall decrease in the number of repeat victims and the rates are either consistent or reduced. Systems are in place to support repeat victims.' The disparity highlighted challenges when broad indicators were used and the risk that organisations measured different things.¹⁸

Indicators to measure how successfully child sexual exploitation was tackled depended on whether it was identified in the first place. The use of tools and assessments had been reviewed by the Centre of Expertise on Child Sexual Abuse. ¹⁹ It found a wide range was used across England and Wales. The importance of professional judgement, guidance and training that is ongoing and embedded, quality assurance, gender sensitivity, and appropriately involving children and parents in the assessment process was highlighted. There had been much focus on the actions of the child rather than perpetrators and it was noted that:

'In completing any screening or risk assessment tool, professionals should keep in mind that it is part of a wider context. Greater clarity is needed as to how situational, environmental and perpetrator or potential perpetrator factors are included in CSE risk assessment and prevention strategies. Less focus on the 'risk' of a young person and more consideration of the wider causes of any presenting behaviour are welcome.'

Importantly, the authors stressed that 'a distinction is made between identifying children and young people who are being sexually exploited and abused, and identifying those who are at a potential risk of being abused and exploited' to ensure the response to each is appropriate.

In August 2023, the NSPCC published learning from case reviews in England and Wales.²⁰ The children in the case reviews analysed had become the subject of reviews due to 'serious and prolonged child sexual exploitation' or 'unexpected death or suicide following child sexual exploitation.' Key learning for professionals included:

- identifying patterns of behaviour and avoiding minimisation of risks such as underage sexual activity, self-harm, worsening mental health, substance misuse, changes to hygiene or physical appearance, spending time with older individuals or groups, going missing from care, home or school, having new things or money;
- See also commentary on this by the Northern Ireland Comptroller and Auditor General highlighting reporting differences between the Northern Ireland Policing Board and the PSNI, Northern Ireland Audit Office, Continuous improvement arrangements in policing, Performance Summary 2023-24 available at https://www.niauditoffice.gov.uk/files/niauditoffice/documents/2025-05/NI/20Audit%20Office%20Report%20-%20Continuous%20Improvement%20in%20Policing%20Arrangements%202025.pdf
- 19 Brown, S., Brady, G., Franklin, A., and Crookes, R. The Use of Tools and Checklists to Assess Risk of Child Sexual Exploitation: An Exploratory Study, Centre of Expertise on Child Sexual Abuse, Coventry University 2023, available at https://www.csacentre.org.uk/app/uploads/2023/10/Child-sexual-exploitation-risk-tools-report.pdf.
- 20 NSPCC, Child Sexual Exploitation: Learning from Case Reviews, August 2023 available at https://learning.nspcc.org.uk/research-resources/learning-from-case-reviews/child-sexual-exploitation.

- listening to the voice of the child;
- victim blaming including viewing children as 'young adults' in control of their own choices rather than being sexually abused was found;
- focusing overly on changing the child's behaviour and not on safeguarding them or disrupting the perpetrators;
- information was not always shared effectively to enable a multi-agency response;
- child sexual exploitation risks being made clear in plans and shared with all professionals working with the child; and
- understanding the impact of grooming and coercion on how a child engages with the criminal investigation including retracting information and the importance of investigative and child safeguarding actions still taking place.

More broadly across the UK there had been a drive to tackle the exploitation of children in all its forms and in so far as this was more comprehensive, it was welcomed. In Northern Ireland, the Safeguarding Board for Northern Ireland (SBNI) had been facilitating member organisations to build capacity to tackle the threat to children caused by criminal exploitation. However, it was important that child sexual exploitation was known as a form of child sexual abuse and that measures specifically tackled the sexual offending. Inspectors spoke to one interviewee who warned that conflating all forms of exploitation contained risks including that the sexual harm experienced by children was not distinguished and called out. Identifying, investigating and bringing perpetrators of child sexual exploitation to justice for their sexual crimes was a key role of the criminal justice system in tackling this form of child sexual abuse.

THE FOLLOW-UP REVIEW

Fieldwork for this Follow-Up Review was undertaken in parallel with CJI's Child Criminal Exploitation Inspection²¹. Voluntary and community sector organisations engaged with Inspectors at an early stage to help inform planning for the Follow-Up Review before a period of fieldwork with the criminal justice agencies. Interview, focus groups and file reviews were completed with the PSNI and the Public Prosecution Service for Northern Ireland (PPS). Interviews and focus groups with the Youth Justice Agency (YJA), the Probation Board for Northern Ireland (PBNI) and the DoJ were also completed. All organisations, including the Northern Ireland Courts and Tribunals Service (NICTS), supplied documentation to evidence progress on implementing the recommendations.

CHAPTER 2: PROGRESS ON RECOMMENDATIONS

STRATEGIC RECOMMENDATION 1

Within six months of the publication of this report, the Department of Justice take forward a cross-Departmental strategic response to tackle child sexual abuse and exploitation, which is linked to any existing and future strategic plans for child protection. Targets for the development of a comprehensive Problem Profile and improved outcomes - measured by children identified and protected, and perpetrators disrupted - should be included, as well as multi-agency evaluated training as recommended by the United Nations Convention on the Rights of the Child, and a framework for independent joint child protection inspection.

Status: Partially Achieved.

ORGANISATIONAL RESPONSE

Summary (extracted from DoJ Action Plan updates June 2021 to latest position)

- The need for a cross-Departmental strategic response is being delivered through the CPSOG [Child Protection Senior Officials Group] mechanism as reflected in the revised TOR, [Terms of Reference] with CPSOG also providing a forum for consideration and direction on the aspect of joint inspections.
- The other aspects of strategic recommendations 1 and 2 regarding the CSE Problem Profile and training are being progressed as part of the work by the SBNI CSE Subgroup. PSNI are working with analysts on how to capture all the information required to produce a comprehensive CSE Problem Profile relevant to strategic recommendations 1 and 2.
- In terms of an inspection framework officials from the CPSOG Subgroup have met with Inspectorate colleagues to discuss their scoping work for a pilot joint CP [Child Protection] inspection.
 [...]
- Dedicated DoJ resource at Grade 7 in place to ensure that the issue of CSE is considered strategically across the Department.
 [...]
- In relation to an enabling framework for joint child protection inspections, the CPSOG Subgroup has worked collaboratively with Inspectorates on a pilot joint child protection inspection to inform the development of a framework. The pilot joint inspection began in August 2021 and the broad aims include learning how the Inspectorates can work together to examine the response to children in need of safeguarding and protection in NI [Northern Ireland] by:

- Examining the multi-agency arrangements for assessing need and risk of harm to children at the point of referral (including through a deep investigation into the experiences of a small number of these children);
- Evaluating the leadership and management of this multi-agency work;
- Evaluating the effectiveness of safeguarding arrangements in relation to this multiagency work;
- Focusing on the child's journey and outcomes for the child; and
- Understanding how multi-agency arrangements support frontline staff to undertake this work.
- The other aspects of strategic recommendation 1 are being progressed as part of the work of the SBNI CSE [Child Sexual Exploitation] Subgroup.

2024 Update

- DoH [Department of Health] advised that since the decision to undertake the Joint Inspection Framework pilot the report of the Independent Review of Children's Social Care Services in Northern Ireland has been published. A Children's Services Strategic Reform Programme has been established to address the issues that gave rise to the Review and were confirmed by it. As part of this work, a Children's Services Front Door Subgroup has been established under Workstream 1 (Waiting Lists) to focus on the recommendations in chapter 10 and 12 of the review report including
 - Recommendation 16: There should be the further development and deployment of multi-professional and multi-agency frontline teams and services to assist children and families.
 - Recommendation 18: The Executive and Department of Health should create and use powers to mandate, and processes to assist, the development of integrated multi-agency services.
 - Recommendation 22: There needs to be a re-set and re-focus for children's social care services to give a greater focus and attention to family support.
- Inspectors met with DoH and DoJ in November 2024 and agreed that decisions on the JI [Joint Inspection] framework cannot progress until we know the outworkings of the work to develop a new Multi-agency Front Door Model (MAFD) through the Children's Services Front Door Subgroup. It was noted that inspection arrangements should be considered following establishment of any new multi-agency arrangements.

DoJ assessment: Partially Achieved.

INSPECTORS' ASSESSMENT

Cross-Departmental strategic response

During the time since the full Inspection, the cross-Departmental CPSOG led a 'Child Sexual Exploitation work plan' through its subgroup established in 2021. The DoJ supported the development and running of this subgroup which included:

- Officials from government Departments the DoH, the DoJ, the Department of Education (DE), and the Department for Communities;
- Representatives from relevant agencies DoH Strategic Planning and Performance Group (SPPG) (formerly the Health and Social Care Board), the SBNI, the PSNI, the PPS, the Executive Programme on Paramilitarism and Organised Crime and the Education Authority (EA).

The CPSOG report for September 2018 to February 2022 stated that, 'the Child Sexual Exploitation work plan includes the following programmes of work:

- I. Marshall recommendations;²²
- II. Leonard recommendations;²³
- III. Criminal Justice Inspection Northern Ireland recommendations;²⁴ and
- IV. Scoping of Barnahus model.²⁵

It was reported that 72 out of 77 recommendations from the Marshall Report had been completed; three completed out of 14 recommendations from the Leonard Report with 11 in progress; and three recommendations completed from the CJI Inspection, that had nine recommendations. Detail in relation to the outcomes achieved because of completing these recommendations and how they had been implemented was not included in the CPSOG report, although it provided examples of key work.

In relation to criminal justice system progress, an outline of the revised structures within the PSNI PPB for tackling child sexual exploitation was included:

²² Marshall, K., Child Sexual Exploitation in Northern Ireland; report of the Independent Inquiry, November 2014 available at https://www.health-ni.gov.uk/sites/default/files/publications/dhssps/csereport181114_0.pdf.

²³ Leonard Consultancy, An Evaluation of how Safeguarding Board for Northern Ireland member agencies are effectively responding to and managing Child Sexual Exploitation within Northern Ireland, SBNI, February 2020 available at https://www.safeguardingni.org/sites/default/files/2020-11/SBNI%20CSE%20Report%20PDF_0.pdf.

²⁴ CJI, An Inspection of how the Criminal Justice System Responds to Child Sexual Exploitation, June 2020, available at https://www.cjini.org/reports/child-sexual-exploitation-in-northern-ireland/.

²⁵ CPSOG Report September 2018 to February 2022, available at https://www.health-ni.gov.uk/publications/child-protection-senior-officials-group-cpsog-report-september-2018-february-2022.

Extract from CPSOG report September 2018 to February 2022

The outcomes of the new structure included:

- visibility for CSE as a standalone specialism, reflecting the importance of the role particularly within the wider Child Abuse and Protection arrangements within PSNI;
- a unified governance structure for CSE with consistency in professional practice and accountability across all five Trust areas;
- patterns and trends involving young persons at risk and those who seek to do them harm can be more readily identified;
- improved file timeliness, which measures how quickly the PSNI are able to submit a prosecution file to the PPS and is a key factor in reducing the attrition of victims from the criminal justice process. This has seen a net reduction from 160 days in January 2021 to 131 days in August 2021. Speedy access to justice is a key issue when considering children at risk of CSE and the single supervision structure is improving the PSNI ability to deliver that;
- improved sanctioned outcome rate. This reflects where the police investigation has been able to be progressed to the point where a decision can be made regarding a prosecution. This figure is historically lower in sexual crime that in other areas, often affected by the victim no longer wishing to proceed with the complaint for a wide variety of reasons. The ability of police to support the victim through the criminal justice process can reduce that attrition from the process.
- PSNI CSE single supervision structure has seen the sanctioned outcome²⁶ rate climb from 13.6% in January 2021 to 20% in August 2021; and
- the supervisory oversight, and unified governance created as a result of CSE being treated as a standalone specialism, has allowed for regional multi-agency training and strategic engagement to take place throughout the reporting period between PSNI and SBNI and HSCT [Health and Social Care Trust] and also with the Education, Youth Services and Ancillary Services sector.

Oversight mechanisms that supported leaders to identify the strategic relevance of patterns in the operational response were important. There was no routine forum for the DoJ to convene with criminal justice partners to examine the issues within its sphere of influence before participating in the broader cross-Departmental CPSOG. Collectively, criminal justice was not monitoring, for example, how long on average children tended to remain at risk, the number of files submitted to the PPS and the types of sanction outcomes, whether children had been successfully safeguarded and supported through the criminal justice system, or whether legislation was enabling or hindering successful prosecutions. Essentially, the type of information to ensure the DoJ understood the quality of the criminal justice response.

²⁶ Police recorded crime outcomes recording practice is that 'Sanction outcomes are applied where a person is formally dealt with by police by means of a charge, summons, offence taken into consideration, formal out-of-court disposal or informal out-of-court disposal' (see PSNI, User Guide to Police Recorded Crime Statistics in Northern Ireland, 29 November 2024, available at https://www.psni.police.uk/sites/default/files/2024-11/Police%20Recorded%20Crime%20User%20Guide.pdf.

Inspectors heard examples and reviewed cases where children remained at risk of sexual exploitation with review meetings resulting in no change over time. Turning 18 years of age continued to be a reason for children leaving the 'Child Sexual Exploitation framework' rather than the risk of exploitation having been tackled. Inspectors reviewed cases where children at risk of sexual exploitation were served with Child Abduction Warning Notices on turning 18 years of age. While there was a need to address and manage risk, this was a poor outcome for child victims of sexual exploitation. It was an example of an issue that should have been gripped strategically so that better child-centred solutions were found.

Aside from monitoring recommendations from specific reports, standalone indicators to demonstrate how sexual exploitation of children was being eradicated had not existed, and there were no baseline measures against which progress across criminal justice could be tracked.

There were relevant strategies including the draft DoJ Victim and Witness strategy²⁷ and the joint DoJ/DoH Domestic and Sexual Abuse Strategy.²⁸ Key priority areas related to children within both strategies were central to tackling child sexual exploitation. This included specialised support and ongoing consideration of a Barnahus-informed model.²⁹ The Domestic and Sexual Abuse Strategy stated that it had not made specific provision to address child sexual exploitation but committed to collaborate with the programme of work being pursued through the CPSOG. How progress was reported to the CPSOG was unclear. It was vulnerable to gaps because there was no DoJ forum to grip criminal justice issues before informing and reporting into wider groups.

During fieldwork, the CPSOG was subsumed into the DE led cross-Departmental group responsible for monitoring and reporting on the Northern Ireland Executive's Children and Young Persons Strategy. Proposals were to 'stand down CPSOG and for child safeguarding/protection to be considered as necessary at meetings of the Children and Young People's Strategy Monitoring and Reporting Board' [emphasis in original]. A rebranded CPSOG Subgroup would report issues to the Children and Young Persons Strategy Monitoring and Reporting Board in exceptional circumstances only.

The SBNI's Child Exploitation Committee (Committee) was not a forum where members were held accountable for their performance in relation to tackling child sexual exploitation. This remained a function of individual organisations and Departmental governance structures. It was instead a multi-agency forum for partners to enhance collaboration in addressing the threat and harm caused to children by exploitation.

²⁷ DoJ, Draft Victims and Witnesses of Crime Strategy 2025-2030, May 2025 available at https://www.justice-ni.gov.uk/consultations/draft-victims-and-witnesses-crime-strategy-2025-2030.

²⁸ DoH/DoJ, Domestic and Sexual Abuse Strategy 2024-2031, September 2024 available at https://www.justice-ni.gov.uk/publications/domestic-and-sexual-abuse-strategy-2024-2031.

²⁹ The Council of Europe had recognised the Barnahus ('children's house') as a leading child-friendly justice response for child victims of sexual abuse. See Barnahus model helps children who suffered sexual abuse from feeling like victims for a second time, say Council of Europe, 17 November 2022 available at https://www.coe.int/en/web/portal/-/barnahus-model-helps-children-who-suffered-sexual-abuse-from-feeling-like-victims-for-a-second-time-say-council-of-europe-leaders.

It had previously been a 'Child Sexual Exploitation Committee' focused on implementing recommendations from the Leonard Report and relevant aspects of the CJI Inspection Report. This included the delivery of multi-agency training and collaboration with the PSNI on the development of a comprehensive Problem Profile.

The Child Exploitation Committee met regularly and had a dedicated membership. It was chaired by the PSNI PPB lead for child safeguarding. There was evidence of partnership working and members exercising challenge in relation to key areas including the pursuit of partner data to inform a more comprehensive Problem Profile.

With the Committee having moved its attention toward developing a multi-agency approach to tackle child criminal exploitation, there was concern that the focus on child sexual exploitation had been lost. CJI had been assured that the Committee's focus was on all forms of child exploitation albeit recent work had focused on establishing the foundations to collectively tackle child criminal exploitation. It was an active and dedicated forum that had formed excellent professional relationships. There was, however, an opportunity for the DoJ to plan for how progress achieved through work undertaken by the SBNI Committee to tackle child sexual exploitation would be embedded across criminal justice. This was needed to ensure that the outcomes for children intended as a result of actioning CJI and other criminal justice related recommendations through the SBNI group were being achieved and sustained long-term. Without it there was limited assurance that child sexual exploitation was being tackled strategically.

Comprehensive Problem Profile with improved outcomes

The PSNI had been leading on the development of a comprehensive Problem Profile supported by the DoJ and partners though the SBNI Child Exploitation Committee. It was acknowledged that this was an ongoing area of work to ensure it was informed by partners and adopted strategically to achieve identified Problem Profile recommendations. Related to the discussion in this Report, Inspectors did not see evidence on a sustained basis of the outcomes achieved or that leaders were strategically managing the future challenges that it identified. A July 2024 Problem Profile had contained limited partner data. An updated August 2025 version reflected some improvements in this respect. However, supporting consistent and long-term input from partners remained an area for development and strengthening the governance framework to ensure more effective multi-agency and cross-Departmental working was vital. Evidence to show how the DoJ and the PSNI planned to use the Problem Profile to inform improvements across criminal justice and with partners was needed. The PSNI indicated to Inspectors that from Autumn 2025, it planned to meet with the DoJ at regular intervals to progress this.

Multi-agency evaluated training

A wide range of multi-agency training and learning sessions had been organised and coordinated including through the PSNI chaired Child Exploitation Committee. Examples included multi-agency child sexual exploitation Professional Development Training with input from external experts in child safeguarding, workshops with child sexual

exploitation Social Work leads, the SPPG and YJA child sexual exploitation leads, training with voluntary and community organisations, and multi-agency Hydra³⁰ training led by the PSNI. Participation within the Hydra training had been extended to criminal justice partners including the DoJ, the PBNI and the YJA, as well as externally to Health and Social Care and EA colleagues. In April 2022 the SPPG, the PSNI and the SBNI agreed to run a series of three planned multi-agency Child Sexual Exploitation Continued Professional Development days which took place over 2022 and 2023. These highlighted current developments and showed examples of practice initiatives. In addition, there had been awareness raising about the signs of child sexual exploitation including with City Councils, airports, and the nighttime economy sector.

Evaluation of training as recommended by the UNCRC was important. Inspectors heard mostly positive views about the Hydra training but also some feedback that integrating a greater range of work undertaken by partners would have enhanced it. Evaluations needed to include an assessment of how outcomes had improved because of training. The response to missing children was an example of an area where training was being delivered by the PSNI to Social Workers and some voluntary sector colleagues. The PSNI needed to understand whether this was achieving positive outcomes for children. It relied on monitoring the numbers reported missing, assured by a downward trend. The quality of its response was not examined routinely. Inspectors had in fact found evidence that the PSNI response to missing children was not adequate and escalated an immediate concern to the Chief Constable (discussed further in relation to Operational Recommendation 5).

Framework for joint child protection inspection

A further aspect of this recommendation related to the development of a framework for joint child protection inspection. A Joint Inspection of Child Protection Arrangements (JICPA) was piloted by CJI, the Regulation and Quality Improvement Authority (RQIA) and the Education and Training Inspectorate (ETI) with a focus on the Southern Health and Social Care Trust.³¹ The findings and lessons were reported to the CPSOG Subgroup to inform its work on the development of a broader framework for joint child protection inspection, which had been progressing in response to this CJI recommendation. In December 2024 work on the development of a framework was postponed enabling implementation of recommendations arising from the DoH commissioned *Independent Review of Northern Ireland's Children's Social Care Services* by Professor Ray Jones. ³² Learning from the pilot joint inspection had been integrated within the Task and Finish Group chaired by the SPPG aimed at scoping options for a multi-agency 'front door.' ³³ This was ongoing at the time of fieldwork.

- 30 Hydra is a type of training used by the PSNI and UK police training that includes immersive training simulations and is provided by the Hydra Foundation (available at https://hydrafoundation.org/).
- 31 CJI, RQIA, ETI, A pilot joint inspection of child protection arrangements in the Southern Health and Social Care Trust area, summary report, June 2023 available at https://www.cjini.org/reports/first-joint-inspection-of-child-protection-arrangements/.
- 32 The Report of the Independent Review of Northern Ireland's Children's Social Care Services, Professor Ray Jones, June 2023, available at https://www.cscsreviewni.net/publications/report-independent-review-childrens-social-care-services-northern-ireland.
- Several 'task and finish' groups were established by the DoH as part of its planning to implement the recommendations arising from the review of children's social care services one of which was to scope options for a multi-agency front door for responding to children's social care referrals.

While there remained gaps, developments in relation to the Problem Profile, multi-agency training and progressing options for joint child protection inspection were positive. Cross-Departmental and multi-agency mechanisms existed but there was limited assurance that the DoJ understood key criminal justice challenges to ensure strategic accountability for tackling the sexual exploitation of children. There was a lack of baselines and indicators to measure progress in eradicating child sexual exploitation, and more robust leadership was needed to ensure operational challenges across criminal justice were strategically gripped. In the absence of longitudinal data, leaders were unable to account for what was being achieved to disrupt perpetrators and protect children from exploitation longer term. It was Inspectors' view that the DoJ was not on track for achieving this aspect of the recommendation.

Overall, Inspectors assessed this recommendation as **Partially Achieved** but cautioned that changes to cross-Departmental governance structures risked diluting the focus on criminal justice system performance and outcomes achieved for victims of child sexual exploitation.

STRATEGIC RECOMMENDATION 2

A comprehensive child sexual exploitation Problem Profile to properly understand its scale and nature in Northern Ireland should be developed. This should be police led in conjunction with the Department of Justice with input from partners and should include:

- collation of anonymous data from statutory and non-statutory partners about child sexual exploitation risks;
- the number of children assessed at risk of child sexual exploitation;
- the outcomes of these assessments (numbers at risk, numbers not at risk, and child protection events);
- the number of children and parents/carers supported;
- police investigations; and
- offenders disrupted and prosecuted.

Status: Partially Achieved.

ORGANISATIONAL RESPONSE

Summary from Action Plan updates October 2020 to latest position Update at October 2020

- A formal request has been submitted to Strategic Analysis Unit [PSNI] for assessment of CSE.
- Terms of reference have been agreed in relation to strategic assessment, meetings ongoing with DoJ and SBNI to progress.
- [...]
- Work on CSE Problem Profile ongoing by PSNI analysts draft due early 2022 draft to be considered by subgroup before being finalised.

Update at January 2022

• First draft of the CSE problem profile on track for end of January 2022. Draft to be provided to subgroup for consideration.

February 2023 Update

• The PSNI led CSE Problem Profile work is moving to SBNI CSE Subgroup to consider the initial findings with a view to informing operational and safeguarding practice across its member agencies. The profile is a live document requiring ongoing updates as new information becomes available.

February 2024 Update

- An analytical CSE profile was created and included data from partner agencies. This will be refreshed a[t] regular intervals to ensure it is up-to-date.
- A further analytical profile has now been commissioned to review qualitative and quantitative information relating to criminally exploited children.

PSNI 2025 Update

• Final draft of the Partnership Profile has been completed and will be shared with the Child Exploitation Committee in the near future.

PSNI assessment: Achieved.

INSPECTORS' ASSESSMENT

The Problem Profile was an important analytical product to help understand the nature and scale of child sexual exploitation in Northern Ireland, identifying recommendations and proposed actions to ensure it was tackled. The College of Policing stated that, '[t]he problem profile must be current and relevant. It should be added to and updated until the problem is dealt with, then stored for retrieval if necessary.'34

The PSNI commissioned analysts to develop a Problem Profile with the July 2024 and August 2025 versions provided to Inspectors. It was positive that this research had been undertaken and that a PSNI analyst had become embedded within the PSNI PPB Child Sexual Exploitation team. There was evidence that the analyst was attending internal meetings with analytical skills being relied on to inform ongoing monitoring of risks posed to children and the PSNI response. In this way, there was potential for the Problem Profile to become a living document informing the everyday response of specialist and frontline PSNI teams, as well as potentially partners.

The Problem Profile identified key points in relation to the under reported nature of child sexual exploitation and several issues that were common to the circumstances of children identified at risk and Persons of Concern. The information was drawn from police systems and it was noted that 'for the most complete picture of CSE in Northern Ireland to be

³⁴ College of Policing, Authorised Professional Practice: Intelligence Products, published 23 October 2013, updated 16 March 2015 available at https://www.college.police.uk/app/intelligence-management/intelligence-products.

built, information available from Police systems isn't sufficient.' At the time of developing the 2024 and 2025 Problem Profiles, it was recommended to engage further through the SBNI Committee to facilitate provision of data from partners. The updated August 2025 Problem Profile was a more comprehensive product in terms of the range of available information. It contained some improvements in the provision of partner data including from Health and Social Care and Education partners, as well as the training and awareness sessions completed by different partner agencies. This was positive but improvements were still needed, for example, participation in education by children identified at risk of child sexual exploitation remaining an information gap.

Key areas of concern were not profiled due to a lack of available or reliable data sets. This included information on how children and parents were supported. CJI had highlighted the importance of referring victims of crime to support services. At the time of the Follow-Up Review, there had been dedicated advocacy, legal and support services funded by the DoJ for children who had experienced sexual abuse including the Children's Independent Sexual Violence Advisor (ChISVA) service (with children's advocacy services for child victims of serious sexual offences subsequently being provided through ASSIST NI),³⁵ the Children's Sexual Offences Legal Adviser (CSOLA) provided by Victim Support Northern Ireland,³⁶ and the NSPCC Young Witness Service when cases progressed to Court.³⁷ European-wide monitoring had highlighted access to timely and accessible support being one of the key factors to avoid against secondary victimisation.³⁸ It was also a key recommendation from the Marshall Report.³⁹

"The Department of Justice should continue to seek to develop and improve the experiences of young witnesses, taking into account research and learning from other countries."

The DoJ had cited child-specific Sexual Offences Legal Advisors as part of progressing this key recommendation. Robust data to measure the accessibility of services for child victims of sexual abuse was therefore important.

The Problem Profile identified that the number of offenders disrupted and prosecuted specifically for child sexual exploitation related offences was also not available. This remained a gap. It was necessary to help inform people about the efficacy of current legislation, any barriers to progressing cases and plans for legislative reform.

- 35 At the time of fieldwork there had been a ChISVA service provided through Victim Support NI. At the time of report writing, the children's advocacy service for child victims of serious sexual offences funded by the DoJ, was provided through ASSIST NI and commenced in July 2025. See https://assistni.org.uk/our-services/.
- 36 CSOLA service, information available at https://www.victimsupportni.com/young-people-crime/csola/.
- 37 NSPCC Young Witness Service, information available at https://learning.nspcc.org.uk/services-children-families/young-witness-service.
- 38 European Commission, Commission Staff Working Document Evaluation of Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA, 28 June 2022 available at https://eur-lex.europa.eu/legal-content/FR/TXT/?uri=SWD:2022:179:FIN.
- 39 Supporting Recommendation 44, Marshall, K., Child Sexual Exploitation in Northern Ireland; report of the Independent Inquiry, November 2014 available at https://www.health-ni.gov.uk/sites/default/files/publications/dhssps/csereport181114_0.pdf.

The PSNI and the PPS had worked to ensure a flag was ticked on the Prosecutor Information Form so that a Prosecutor would be aware if a child victim or a suspect had been at risk of child sexual exploitation. This helped inform Prosecutor decision-making and the types of further information that might be required from Police. However, it was not possible to extract this information for a statistical report.

It remained the case that five years after the CJI Inspection, the number and types of offences prosecuted successfully to tackle child sexual exploitation was unknown. Victims of child sexual exploitation had been sexually harmed and there was no clear picture of whether legal frameworks had facilitated prosecution of the sexual offending. The most recent PSNI Problem Profile recommended the development of a child sexual exploitation investigation flag, which would assist in building a picture of how many and what types of child sexual exploitation related offences had been progressed.

There was limited evidence that the recommendations and key points within the Problem Profile were being routinely used to inform action within the PSNI or by partners. Issues had been identified that were similar to concerns highlighted when CJI completed the 2020 Inspection. This included limited reporting of Modern Slavery and Human Trafficking offences for children being exploited and therefore a lack of intelligence on this. CJI acknowledged the recent DoJ-led NRM pilot which followed Home Office Guidance to devolve NRM decision-making for children to local safeguarding structures. ⁴⁰ A local mechanism to decide cases was positive. The low number of referrals for children in Northern Ireland had been a longstanding issue and the devolved pilot aimed to increase this through enhanced training and greater awareness.

The PSNI Problem Profile identified a need to ascertain if '[Modern Slavery and Human Trafficking] levels' are actually low or if under reporting or poor recording was an issue. Evidence from the fieldwork for this Follow-Up Review and the CJI Inspection focused on the response to child criminal exploitation highlighted gaps in awareness and missed opportunities to examine potential Modern Slavery or Human Trafficking offences and referrals to the NRM.

The Problem Profile also highlighted a need to focus on the people exploiting children rather than the emphasis on the behaviour of victims, and for training to ensure Police Officers were open and engaging with children. A comprehensive plan to show that these and other issues identified were being progressed by the PSNI was needed. During the file review for this Follow-Up Review and the Child Criminal Exploitation Inspection fieldwork, the voice of the child and child-centred approaches were absent. If working with the intelligence that the Problem Profile identified, CJI would have expected the PSNI to identify and remedy these issues.

⁴⁰ Home Office, Devolving child decision-making pilot programme: general guidance, updated 15 August 2025 available at https://www.gov.uk/government/publications/piloting-devolving-decision-making-pilot-programme-general-guidance-accessible-version

It was positive that the Problem Profile had been developed and a dedicated focus on ensuring a greater level of partner data could be incorporated. The embedding of an analyst within the PSNI PPB Child Sexual Exploitation team was also a welcome and important development. Improvements were needed to enhance the types of data available to analysts and from leaders to evidence how the intelligence was being used strategically to achieve better outcomes for victims. For these reasons, CJI assessed this recommendation as **Partially Achieved**.

OPERATIONAL RECOMMENDATION 1

The Police Service of Northern Ireland introduce without delay the proposed IT process to alert within its system children on the Child Protection Register.

Status: Achieved.

ORGANISATIONAL RESPONSE

Update at October 2020

- Process is now in place for generating alerts for children on the Child Protection Register. [...] Some further progress is to be made.
- Engagement has taken place with [the] Health and Social Care Board [HSCB] to ensure all information is passed to police to enable early flagging of children on the CPR [Child Protection Register].
- This process was used recently in identifying children at risk during the pandemic, enabling child abuse crime prevention actions to be allocated to district policing to protect vulnerable children in communities.

Update at June 2021

- Approximately 2,156 alerts for children generated.
- Working Group established between [the] HSCTs, HSCB and PSNI to ensure timely information sharing and data accuracy. This Group meets monthly and is governed by the PSNI/Health and Social Care Strategic Co-ordination Group.

February 2024 update

The process remains in place.

PSNI assessment: Achieved.

INSPECTORS' ASSESSMENT

The PSNI had introduced a system to alert child protection registration on its NICHE system⁴¹. This had resulted in a child protection flag in relation to the child or children in need of protection and a warning flag attached to the relevant adult.

Information about the nature of the risk was, however, limited. It was not always easy to establish who posed a risk to the child or the nature of the risk (even if known), and in relation to a warning flag attached to an adult, which child the concern was related to. This was highlighted in the JICPA report⁴² and in the CJI's recent Follow-Up Review Report on Police Custody arrangements. ⁴³ It was an area for the PSNI to continually review and improve to ensure the accessibility of information required by Police Officers to protect and safeguard children.

Inspectors assessed this recommendation as **Achieved**.

OPERATIONAL RECOMMENDATION 2

All agencies should review and update procedures applicable to tackling child sexual abuse including child sexual exploitation and ensure alignment with child protection policy and procedures. In particular:

- the Public Prosecution Service for Northern Ireland and the Northern Ireland Courts and Tribunals Service each require a child safeguarding procedure. This should be tailored to their particular functions and regularly reviewed;
- the Probation Board for Northern Ireland should review its existing child safeguarding procedures to ensure safeguarding in the specific circumstances of child sexual exploitation is covered, and that instruction about the risks of sexual harm to 16 and 17-year-olds is clear;
- the Police Service of Northern Ireland develop a child sexual exploitation operating procedure that is grounded within child protection, and ensure that all other related police procedures and instructions are cross referenced and aligned; and
- the Public Prosecution Service for Northern Ireland develop a staff instruction for Prosecutors on child sexual abuse and exploitation. This should include its approach to child suspects who are victims of child sexual exploitation.

Status: Partially Achieved.

⁴¹ Niche is a records management and IT system used by the PSNI.

⁴² CJI, RQIA, ETI, A pilot joint inspection of child protection arrangements in the Southern Health and Social Care Trust area, summary report, June 2023 available at https://www.cjini.org/reports/first-joint-inspection-of-child-protection-arrangements/

⁴³ CJI, Police Custody: The detention of persons in police custody in Northern Ireland available at https://www.cjini.org/reports/the-detention-of-persons-in-police-custody-in-northern-ireland-2/

ORGANISATIONAL RESPONSE

NICTS - Complete Achieved

• A child safeguarding policy is now in place and shared with staff.

PBNI - Complete Achieved

• Existing child safeguarding procedures reviewed to ensure safeguarding in the specific circumstances of CSE is covered, and instruction about the risks of sexual harm to 16 and 17-year-olds made clear.

PPS - Achieved [extracts from Action Plan]

- Amendments to the Code for Prosecutors [to] reflect changes to the public interest considerations to specify cases involving CSE/CSA [Child Sexual Abuse] both from the point of view of a victim and of a suspect who was previously subjected to such abuse.
- PPS issued a document entitled 'Child Safeguarding Guidance' to all staff on 28 October 2021. On the same day the document was also uploaded under 'Staff Instructions' on the intranet. [...]
- PPS Sexual Offences Policy, which contains information on CSE and CSA [Child Sexual Abuse], went out for consultation in February 2022 for 14 weeks. [...]
- The PPS published a new Sexual Offences Policy for Prosecuting in November 2023, to provide guidance on how we take decisions in this category and the support available for victims.
- A Staff Instruction in relation to CSE was developed and launched with an accompanying training video in 2023. [...] Police contributed to the training video to provide real examples for Prosecutors of CSE in Northern Ireland.
- The PIF [Prosecutor Information Form] has been changed on prosecution files to indicate CSE as a factor clearly to all parties.
- A 5-year Sexual Offences Strategy will be developed in the next year which will include the development of joint performance measures to ensure that work continues to be developed in this important area.

PSNI - Achieved.

February 2023 update

- A new process is in place across the organisation relating to children at risk of CSE.
- The CSE risk assessment is currently being reviewed.
- A new overarching service instruction on children incorporating CSE has been reviewed and updated. This is a living [document] and is under regular review. This will be cross referenced with an updated child protection service instruction, missing person service instruction and the Runaway and Missing from Care Protocol.
- CSE policy will be finalised on completion of review of Missing Person Protocol.
- The Missing Persons Strategic Working Group has been set up and is chaired by the Public Protection Branch. This meets regularly and its work includes reviewing the Missing Children Protocol with HSC[T].

February 2024 Update

- A CSE e-learning package has been produced alongside a CSE Toolkit and corresponding APP [information technology application] that frontline officers are able to use on their mobile devices.
- PSNI are delivering multi-agency Hydra (immersive learning) training in relation to child safeguarding issues including CSE.

February 2025 Update

- CSE Investigator's Guide has been updated including Persons of Concern.
- Implementation of CSE joint agency Daily Risk Management Meeting.
- Hydrant Programme⁴⁴ Self-Assessment completed in 2024 and will be repeated in 2025.

INSPECTORS' ASSESSMENT

Procedures related to child safeguarding had either been introduced or reviewed across all the criminal justice agencies since the time of the full Inspection. The NICTS and PPS had introduced child safeguarding procedures tailored to their functions. The PSNI Child Protection Service Instruction had been reviewed in October 2023 and updated during the time of this Follow-Up Review. It cross-referenced other relevant policy and procedures and stated that child protection was a 'fundamental part of the duties of all Police Officer and Police Staff.' As with the full Inspection, review was still required to ensure it aligned with practice. It continued to refer to a PSNI Central Referral Unit (CRU) Operating Protocol which was not available and the cited 'Regional Guidance - Missing Children Protocol,' which had been replaced with an 'Interface Protocol.'

The PBNI had reviewed its child safeguarding and sexual offences policy and procedures shortly after the fieldwork for the original inspection and amended this to include child sexual exploitation and ensure the risks of sexual harm to 16 and 17-year-olds was set out. This reflected the fact that children could still be victims of child sexual exploitation even if they had reached the legal age of consent. The YJA had reviewed its child safeguarding policy and procedures in 2023 and they were subject to ongoing review.

The PPS published Guidance for prosecuting cases involving child sexual exploitation in November 2023. This provided practical and legal guidance for Prosecutors where the victim or suspect was or had been at risk of child sexual exploitation. Learning from the Marshall Report and the nature of child sexual exploitation was outlined. Factors to consider when prosecuting relevant cases was also covered including '...building evidence-based prosecutions and tackling anticipated attacks on the credibility of the victim.' Referring to the research of Professor Helen Beckett, it noted 'Whilst expert evidence on the impact of CSE on victims and how this can influence their conduct is not generally permissible in criminal trials prosecutors should, if they have not already, familiarise themselves with work that experts in this field have published.'

⁴⁴ https://www.npcc.police.uk/our-work/work-of-npcc-committees/Crime-Operations-coordination-committee/hydrant-programme/

In respect of the evidential and public interest tests it stated:

If the evidential test is met, prosecutors will have to consider how a suspect/victim of CSE's offending may have been influenced by their experience of CSE. A new process is now in place where police will notify PPS via the PIF if a suspect or a victim in the case is considered to be at risk of CSE or has been previously at risk.

It should be noted that a specific CSE public interest consideration will be added to the Code for Prosecutors which should prompt prosecutors to address CSE specifically in their written reasoning. Considerations related to CSE were also specifically included in the PPS Policy for Prosecuting Sexual offences⁴⁵ and included reference to human trafficking (cross referencing the PPS policy on same⁴⁶).

The possibility of suspecting child sexual exploitation in cases where this had not been flagged by the PSNI was also highlighted. Possible signs were set out with guidance for Prosecutors to raise a query with the Investigating Officer to ensure information was forwarded to the PSNI PPB.

The PPS Serious Crime Unit (SCU) team members who met with Inspectors were familiar with the signs of child sexual exploitation and the procedures to follow, although there had been limited experience of referring matters to Social Services or back to the PSNI. As in the original Inspection, it remained possible for cases related to child exploitation to exist in other PPS teams. For example, not all sexual offences were allocated to the SCU and cases involving child suspects remained with specialist Youth Prosecutors. Examining how policy was supporting Prosecutors in their work across all relevant teams would be important (see further in CJI assessment of progress on Operational Recommendation 7).

In May 2023 the revised Code for Prosecutors included factors related to child sexual exploitation within the public interest test in both 'considerations for prosecution' and 'considerations against...'. ⁴⁷ Guidelines for the Prosecution of Young People published in December 2021 had also set out various provisions for Prosecutors to consider when the child had been a victim of sexual exploitation. ⁴⁸ This included considerations for diversionary disposals.

The PSNI PPB developed several new or refreshed policies. This included a 'CSE Officers' Guide' (October 2024), a PPB Investigative Parameters (January 2021), a 'CSE Disruption Toolkit,' and a PPB Persons of Concern Strategy: Child Sexual Exploitation, (August 2024). The range of policies developed was positive and was indicative of the focus placed on

⁴⁵ PPS, Policy for Prosecuting Sexual Offences, November 2023 available at https://www.ppsni.gov.uk/files/ppsni/2023-11/
https://www.ppsni.gov.uk/files/ppsni/2023-11/
pps%20Policy%20for%20Prosecuting%20Sexual%20Offences.pdf.

⁴⁶ PPS, Policy for Prosecuting Cases of Modern Slavery and Human Trafficking, updated May 2022 available at https://www.ppsni.gov.uk/files/ppsni/publications/PPS%20Policy%20Prosecuting%20Cases%20of%20Modern%20Slavery%20and%20Human%20Trafficking%20%28Updated%20May%202022%29.pdf.

⁴⁷ PPS, Code for Prosecutors, May 2023 available at https://www.ppsni.gov.uk/files/ppsni/2023-05/Code%20for%20
Prosecutors%20-%20May%202023_0.pdf.

⁴⁸ PPS, Guidelines for the Prosecution of Young People, December 2021 available at https://www.ppsni.gov.uk/publications/guidelines-prosecution-young-people.

enhancing how the PSNI tackled child sexual exploitation. The toolkit included legislative tools for Officers to disrupt child sexual exploitation and relevant offences, the potential impact of using different measures and case scenarios.

Supporting parents in disrupting exploitation and providing them with an allocated Police Officer had also been included, as well as victim support options including the Sexual Assault Referral Centre (the Rowan), ASSIST NI and the ChISVA service. Sharing information with partners and within the PSNI to 'CSE Officers' in each PPB HSCT area had been covered, along with the use of information technology system flags, and guidance on the individual profile intended to contain useful information should a child at risk of child sexual exploitation be reported missing.

It was important that all policies and procedures were finalised, as some had remained in draft, and checked for the national best practice. Operationalising policies was vulnerable to gaps. The toolkit referred to 'CSE Officers' for each HSCT area, but this level of resource had not been available for some time. CJI's file audit showed that case allocation was not always correct or in the best interests of the investigation and flags had at times been missing.

There was evidence that the child's best interests had not always been a primary consideration in policy drafting. For example, a child sexual exploitation assessment for a child in care was required within 72 hours of the referral and 35 days for a child in the community. An evidence-based reason for this difference was not available. The risk assessment tool focused entirely on the behaviour and history of the child with limited reference to the Persons of Concern. This was not in keeping with the Child Sexual Exploitation team's approach, which had in fact been advancing a focus on Persons of Concern through its strategy and partnership meetings. Children as well as adults could be perpetrators, and the sensitivity required when tackling child sexual exploitation in this circumstance, as well as awareness, needed better reflected including in the toolkit.

The Philomena Protocol⁴⁹ had been rolled out across Northern Ireland for use jointly by the PSNI and the HSCTs in relation to Residential Children's Homes and Supported Living Accommodation. The PSNI said it enhanced the response to children missing from these settings by clearly outlining the child's history, risks associated with them and the missing incident, and the due diligence actions by the carers. Inspectors noted the requirement for HSCT Social Work staff to complete it before the PSNI accepted a missing report with the exception being where there was a real and immediate risk of harm to the safety of the child or others. This was defined within the 'Interface Protocol' as '...a real and immediate threat or risk of serious injury or death' and the PSNI Missing Persons Service Instruction as '...a real and immediate serious concern for that person's life.'50 Inspectors were concerned about how this threshold was applied and reviewed cases where information on the police system pointed to risks of real and immediate harm. In

⁴⁹ The Philomena Protocol is a national scheme that encourages agencies, carers, guardians, families and friends to record vital information which can be used in the event of a vulnerable child or young person going missing.

⁵⁰ PSNI, Service Instruction: Missing Persons Investigations SI0423, available at https://www.psni.police.uk/sites/default/files/2024-12/Missing%20Persons%2016%20December%202024.pdf.

some cases, this indicated a high risk of sexual harm. Improving 'interface working' was important but it had detracted from a child-centred approach and the focus that should have been placed on the children's circumstances.

National Police Chiefs' Council (NPCC) Guidance in England stated that, 'If a child is reported as missing and the police question the appropriateness of the report, the police should engage with the reporting person to discuss actions taken and the concerns held. Professional disagreement regarding as to whether a report is warranted or not, should not result in the concerns held by the carer/local authority not being fully considered, nor should it lead to no action being taken to locate the child and to ensure their safety.'51 This was a fundamental safeguard. The NPCC framework had also required an escalation pathway '...whereby the carer/child's social worker can immediately escalate the matter to the Senior Police Officer on duty who has operational command responsibility, where the carer/child's social worker believes there is concern for the immediate safety of the child or another person and the police have refused to respond or deploy an officer.' Minutes of PSNI/Health and Social Care operational liaison meetings demonstrated concerns being raised about disagreement and delay in the PSNI response to missing reports but there was no evidence of these being acted on or escalated strategically.

There was an increasing knowledge base that new technologies and social media provided greater opportunities for offenders to target all children including children in the community.⁵² The PSNI/Health and Social Care 'Interface Protocol' lacked direction around the potential for children in the community to be missing repeatedly. It had not set out how return interviews would be beneficial in this circumstance or support for parents and carers who were protective despite this being emphasised in the 'CSE toolkit.' Inspectors found that beyond the PPB team, there was not a consistent understanding of the potential for all children to be at risk of child sexual exploitation.

The PSNI indicated it was reviewing procedures for tackling child sexual exploitation and related policies at the time of Follow-Up Review fieldwork and this was welcomed by Inspectors. Across the range of PSNI documentation, risks to children in the community could be better reflected, and the focus for children living in care needed urgently reset to ensure a 'child first' approach. There was potential for including a broader range of organisations in protocols designed for missing children too. Education, youth justice and voluntary sector organisations that provided supported accommodation for children would be important partners in helping ensure a child-centred response to missing children, for example.

Inspectors assessed this recommendation as achieved for the NICTS, the PBNI, the PPS

⁵¹ NPCC with the Fostering Network, National Youth Advocacy Service, The Children's Homes Association, Keys Group, Children Who Go Missing from Care Framework, available at https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/national-crime-coordination-committee/2023/children-who-go-missing-from-care-framework.pdf.

⁵² College of Policing, APP: Responding to child sexual exploitation, published 19 December 2013, updated 9 January 2025 available at https://www.college.police.uk/app/major-investigation-and-public-protection/responding-child-sexual-exploitation.

Exploitation/responding-child-sexual-exploitation.

and the YJA and not achieved for the PSNI. Assessment was based ultimately on whether benefits had been achieved, in this case for children, with evidence that outcomes would be sustained and monitored long-term. Overall, Inspectors assessed the recommendation as **Partially Achieved**.

OPERATIONAL RECOMMENDATION 3

Within six months of the publication of this report, the Police Service of Northern Ireland implement a consistent approach to child sexual exploitation across its five Public Protection Units within a model that is adequately supervised and resourced.

Status: Not Achieved.

ORGANISATIONAL RESPONSE

PSNI Update: The Police Service of Northern Ireland (PSNI) has implemented a consistent, organisation-wide approach to tackling child sexual exploitation (CSE) across all five Public Protection Trust areas, meeting the requirements of this recommendation within the specified six-month timeframe.

Standardised Operating Model: By September 2020, PSNI introduced a new, consistent CSE operating model across all PPUs. A workshop involving CSE practitioners and supervisors was held to support the implementation, and a uniform investigative strategy was agreed and adopted across all teams.

Centralised Supervision: A dedicated central supervision structure, focused solely on CSE, was established. This structure commenced on 1 September 2020 as a six-month pilot to ensure robust oversight and consistent practice across the organisation.

Structural and Training Enhancements: In October 2020, PSNI restructured its CSE teams to enhance alignment with child protection priorities. A tailored CSE training package was also developed and delivered across the service to support consistent understanding and practice.

Having fully met the objectives of the recommendation - namely a consistent, supervised, and resourced approach to CSE - this action was approved for closure by the Assistant Chief Constable, Crime Support Department, on 8 November 2020.

PSNI assessment: Achieved.

INSPECTORS' ASSESSMENT

In the six months following the full inspection, the PSNI reviewed its operating model for responding to child sexual exploitation and developed a structure to deliver a greater degree of consistency across its five Public Protection Units with enhanced resource and a centralised supervision structure. The creation of dedicated 'CSE Officer' roles and a Detective Chief Inspector with responsibility for supervision of the Child Sexual Exploitation team was a key aspect of this renewed approach. Unlike during the full Inspection, 'CSE Officers' would no longer be allocated a new Child Abuse Investigation case load. This enabled capacity for proactive work and greater focus on the types of investigative support required to increase disruption and progress evidence-led prosecutions.

In 2024 the PSNI took part in the NPCC Hydrant Programme.⁵³ It worked to ensure a coordinated policing response to child sexual abuse and exploitation. The PSNI completed a self-assessment covering:

- the support and response to victims and survivors including challenging victimblaming language and ensuring consideration of the voice of the child;
- data analysis;
- investigations including 'not indefensibly criminalising children who have been exploited';
- training and development including performance management; and
- partnerships.

There had been scope to identify actions required and support sought from Hydrant. This had resulted in learning visits to other policing areas for PPB representatives. As with this Follow-Up Review, there was no sense of how the measures the PSNI outlined within the Hydrant self-assessment were working. The PSNI indicated it was due to participate in a further Hydrant Programme assessment. The usefulness of the 2024 exercise and any further undertaking depended on how comprehensively the PSNI reflected the impact of its actions over time and the consequences of a depleted resource.

At the time of the Follow-Up Review and due to a combination of factors including vacant posts and longer-term absence, the PPB Child Sexual Exploitation team had three Detective Constables out of a complement of 12. This resulted in three Officers covering the work required for all five HSCT areas and extra pressure on the two Supervisors to assist with this, as well as completing their supervisory roles. Supervisors had a significant and time-consuming role in ensuring maintenance of flags on the PSNI information technology system and the Follow-Up Review file review found these were not always upto-date. Reactive work and daily monitoring to ensure immediate concerns were being actioned had, by necessity, become the priority. This had been frustrating for the team who were dedicated to preventing child sexual abuse.

^{53 &}lt;a href="https://www.npcc.police.uk/our-work/work-of-npcc-committees/Crime-Operations-coordination-committee/hydrant-programme/">https://www.npcc.police.uk/our-work/work-of-npcc-committees/Crime-Operations-coordination-committee/hydrant-programme/

Evidence that children remained at risk of child sexual exploitation long-term was difficult to address with resources at such low levels. It was positive that the team had introduced a joint Daily Risk Management Meeting with HSCT leads and a strategy to focus disruption and investigative work on Persons of Concern. As well as involving HSCTs within this, consideration had also been given to including the YJA. But there was no contingency plan for resourcing this important area of work.

During Follow-Up Review fieldwork, the PPB escalated its Child Sexual Exploitation team resources to the PSNI organisational risk register and it was being actively reviewed. A recent bid had resulted in one Detective Constable being allocated to the team but this would not address capacity issues longer term. Vicarious trauma had been highlighted as a key area of focus within the Hydrant Programme. CJI had concerns about the PSNI being able to manage this within the current arrangements.

While acknowledging the dedication and commitment of the Child Sexual Exploitation team and the resourcing pressures challenging the PSNI, Inspectors assessed this recommendation as **Not Achieved**.

OPERATIONAL RECOMMENDATION 4

Within six months of the publication of this report, each inspected agency - the Police Service of Northern Ireland, Public Prosecution Service for Northern Ireland, Probation Board for Northern Ireland, Youth Justice Agency and the Northern Ireland Courts and Tribunals Services - should complete a child protection (including child sexual exploitation) training needs assessment and time bound risk assessed plan for delivery.

Status: Partially Achieved.

ORGANISATIONAL RESPONSE

PSNI – Achieved

Update: The Police Service of Northern Ireland (PSNI) has completed the actions required under this recommendation through a structured, phased approach involving a comprehensive training needs assessment and the development of a risk-assessed plan for delivery.

Training Needs Assessment: An initial CSE Training Needs Analysis (TNA) was conducted by the Police College in late 2020. While the initial findings indicated that CSE awareness across the organisation was broadly strong, some gaps - particularly in specialist and refresher training - were identified and addressed through further work in early 2021.

Consultation and Collaboration: The TNA [Training Needs Analysis] process included extensive engagement with Crime Training, District Training, and the newly appointed CSE Detective Inspector. A survey of 500 officers informed the refinement of the TNA, and additional amendments to foundation and crime training modules were submitted to [the] PCNI [Police College Northern Ireland] for implementation.

Training Materials and Delivery: A new e-learning CSE training package was developed, rolled out, and completed by nearly 1,000 officers. This package has proven effective in the operational environment, particularly under COVID-19 restrictions. It is now being formalised as a mandatory training requirement for all operational officers.

Risk-Assessed Delivery Plan: Based on the TNA [Training Needs Analysis] findings and feedback from [the] PSNI's training college, a time-bound, risk-assessed plan for training delivery is being finalised. This includes updates to CR2 training documents and long-term planning to embed CSE content into foundation, probationer, and advanced investigative training pathways.

These actions demonstrate that PSNI has met the requirements of the recommendation by completing a thorough training needs assessment and taking forward a structured and informed plan to address identified gaps.

Latest updates

- [...] The new multi-agency Hydra training programme for CSE will be rolled out over [a] two-year period beginning autumn 2023.
- Completion rates for CSE on-line training package are monitored and are increasing with regular reminders by vulnerability leads.
- CSE e-learning package refreshed and relaunched in September 2023 [...]
- CSE Detective Inspector completed a section on CSE in April 2023 to be included in a training video for new student officers.
- CSE Hydra training extended to include Youth Diversion Officers and Concern/Support Hub Officers.

PPS - Achieved [latest update]

- A CSE Training Video has been filmed by PPS, with police input, and uploaded to the intranet for all prosecutors to view. The method allows all prosecutors to see the training whatever their work schedule and provides an ongoing refresher tool as needed.
- A Staff Instruction was also issued to all staff to accompany the release of the training.

NICTS - Achieved

• TNA [Training Needs Analysis] complete, staff directed to child safeguarding training on LINKs [LINKs is the Northern Ireland Civil Service e-learning and training platform].

YJA and PBNI - Achieved

• CSE awareness training completed. Work ongoing with Gillen Team and also CSE SBNI Subgroup on multi-agency training.

INSPECTORS' ASSESSMENT

Each agency had undertaken a training needs assessment with a plan for delivery of child safeguarding training and/or learning specific to tackling child sexual exploitation. Most staff Inspectors spoke to across the criminal justice agencies considered that awareness of child sexual exploitation had improved since the time of the full Inspection. It had become well-embedded within agencies like the YJA where discussions about current issues had become a routine part of internal governance structures.

A Training Needs Analysis was completed by the PSNI in 2020. This was based on a survey across the PSNI to gauge awareness of child sexual exploitation. Results showed a good understanding but variation in answers and responses. Training to ensure standardisation in how the PSNI recognised child sexual exploitation and reduced the risk of harm to children was recommended. It advised adding online child sexual exploitation training to the mandatory requirements for all Officers, local 'CSE Officers' details being routinely disseminated within each District, and regular updates and campaigns.

Amendments to foundation and crime training modules were made with input from the Child Sexual Exploitation Detective Inspector. Almost 1,000 Officers had completed the relevant e-learning package by the time of PSNI's review of this recommendation in 2022. However, by March 2025 only 441 Officers had completed refreshed child sexual exploitation e-learning. The PSNI reported that the e-learning had not been added to the mandatory training list and this would be corrected.

Inspectors had identified child sexual exploitation training as an area for improvement for call handlers. While e-learning was available, it was not mandatory and opportunities to undertake it were limited due to low numbers and high attrition rates within the Contact Management Centre.

The PSNI had not undertaken an analysis of broader child protection training needs. Child protection was featured within the Student Officer Development Programme (completed by 512 Student Officers in the past 36 months) and within the Crime Faculty training. This included Child Sexual Exploitation Hydra training, an immersive scenario-based learning. Approximately 150 participants had completed this at the time of fieldwork. It was positive that partner agencies had been included and that Youth Diversion Officers and Concern Hub Officers had been specifically invited from February 2025. As already noted, it was important to understand the impact of training on practice.

Local Area Training had also been provided but coverage was fragmented and differed by area. The PSNI updated as follows:

- *Modern Slavery and Human Trafficking September 2021* to which a child sexual exploitation add on appears to have been included in Newtownabbey station.
- Persons of Concern notice/Child Sexual Exploitation August 2023 475 DPC
 [District Policing Command] Officers trained in North DCS [District Command Structure].
- Missing Persons Training (delivered March 2024) which included the new Philomena Protocol.

PSNI Officers who met with Inspectors considered that knowledge about child sexual exploitation had improved since the full Inspection but the drive to raise awareness was less apparent. In the past, opportunities for care home staff and local Police to undertake joint awareness sessions existed. Although e-learning was useful, Officers considered it less impactful than engaging with Social Worker colleagues in person. It helped enhance understanding about respective roles and the safeguarding risks for missing children. Inspectors heard some good examples of this type of joint engagement, but it was sporadic and not embedded. The PSNI long-term-plan had been to embed content about child sexual exploitation within foundation, probationer and advanced investigative training.

Following the completion of a child sexual exploitation staff instruction, the PPS developed a training video alongside the PSNI, which all Prosecutors had been encouraged to view. There had also been a dedicated training session related to tackling child sexual exploitation for the SCU team. A training video on its new child safeguarding procedure had also been made available. The PPS had no sense of completion rates. Again, as with multi-agency training, the PPS needed to examine impact in practice to determine whether factors related to sexual abuse and exploitation had been better reflected in Prosecutors' decision rationale.

The PBNI had revised the content of its child protection training to include child sexual exploitation and this was delivered to all newly appointed operational staff as part of induction. Its safeguarding training (relating to children and adults) was mandatory for all operational staff to undertake every two years and was regularly updated. It included reference to relevant human rights provisions, contextual safeguarding, the PSNI use of Child Abduction Warning Notices and relevance to the PBNI's work, and several case study scenarios.

Mandatory child protection training was provided for all YJA operational staff and training on its revised child safeguarding policy and procedures was delivered in April 2022, which included child sexual exploitation. An awareness session was also provided to several staff by a subject expert on Contextual Safeguarding in February 2024. It had an Assistant Director lead on child sexual exploitation and Child Exploitation Champions whose role included disseminating information and learning to staff. It had also been included on the PSNI Hydra programme.

Child safeguarding training was available to NICTS staff through the Northern Ireland Civil Service e-learning platform 'LINKs.' It was an interactive module that included guidance on identifying signs of child abuse, how to raise a concern and the different forms of abuse including child sexual exploitation, child trafficking, online risks and grooming. Inspectors acknowledged that the level of knowledge required was less than for the other criminal justice agencies, but it was important and welcome that NICTS staff were supported with accessible information relevant to the job role. It was not a mandatory training requirement and the NICTS was unable to provide completion rates. It had been accessed 58 times by July 2025 and e-learning on supporting victims and witnesses to provide evidence in Court was accessed 129 times.

There was a drive to develop child safeguarding and awareness of child sexual exploitation within organisations, as well as engagement in multi-agency training opportunities through the SBNI. The training needs analysis undertaken by the PSNI had been a thorough exercise in seeking to understand its knowledge of child sexual exploitation. The low uptake of the PSNI e-learning was disappointing particularly given the time that had passed since the full Inspection. The Follow-Up Review file review demonstrated the importance of continually reviewing the adequacy of training to address Officer attitudes and was an area for improvement. Across the board knowledge about the impact of training on practice was limited.

Inspectors assessed this recommendation as **Partially Achieved**.

OPERATIONAL RECOMMENDATION 5

Within three months of the publication of this report, the Police Service of Northern Ireland's Public Protection Branch should develop a routine quality assurance process for how it manages the police response to child sexual exploitation with the aim of ensuring adequate and timely risk assessment and investigative activity including child protection investigation. CJI suggests this includes:

- sampling from the full range of child sexual exploitation risk assessments (risks assessed high, medium, low and no risk);
- Central Referral Unit decision-making particularly decisions for single agency Social Services investigation;
- missing reports including the quality of return interviews, and 'concerns for safety' recorded for children;
- adequacy of referrals to the Rowan Sexual Assault Referral Centre;
- the quality of safeguarding actions including referrals to Social Services;
- the submission and sharing of child sexual exploitation related intelligence;
- the use of disruption tools including Child Abduction Warning Notices and the appropriate alerting of these to the Probation Board for Northern Ireland; and
- information exchange and liaison internally within the Police Service of Northern Ireland including with the Public Protection Arrangements Northern Ireland and the Modern Slavery and Human Trafficking Unit and Youth Diversion Officers.

Status: Not Achieved.

ORGANISATIONAL RESPONSE

PSNI Update: The Police Service of Northern Ireland (PSNI) has implemented a routine quality assurance process for managing its response to child sexual exploitation (CSE), fulfilling the requirements of this recommendation within the designated three-month timeframe.

Quality Assurance Implementation: A structured quality assurance approach was embedded within a six-month pilot launched in September 2020. This included consistent supervision and oversight across Public Protection Units (PPUs) and the centralisation of CSE-related decision-making.

Scope of Review: A comprehensive internal review was conducted in July 2020. Key elements identified in the recommendation - such as the sampling of risk assessments, review of Central Referral Unit [CRU] decisions, missing person reports, referrals to the Rowan Centre, intelligence submissions, and safeguarding actions - were incorporated into ongoing monitoring and quality assurance activities.

Sustained Monitoring: Compliance is continuously monitored through monthly Senior Leadership Team (SLT) meetings, ensuring routine oversight and response to emerging risks and performance issues across the CSE framework.

Integration with Broader Work: This quality assurance process was developed in parallel with, and complements, other related recommendations - including the creation of a standalone CSE operating procedure, centralised supervision structures, and training needs assessments.

Following the successful completion of the pilot and confirmation that all necessary actions were embedded and functioning effectively, this recommendation was approved for closure by ACC [Assistant Chief Constable] Crime on 8 November 2020.

Latest update

The return interview process is under review [...].

New CSE performance card devised and reviewed each month by Head of Public Protection Branch.

A new daily template has been created reviewing each incident and missing episode daily.

[...].

Increased connectivity with [the Modern Slavery Human Trafficking Unit.[...]

The CSE team are participating in a self-assessment under the Hydrant Programme in line with other UK police forces. This is to benchmark effectiveness and identify best practice,

The [Child Abduction Warning Notice] guidance has recently been updated.

CSE Officer Investigative Guide and CSE Persons of Concern Strategy created with clear timescales to adhere to - agreed with partners.

Review of CSE Risk assessment tool completed with partners and dip-sampling and review of assessments - new assessment tool currently with Trust Assistant Director's for sign-off.

Philomena Protocol and Missing Person's Service Instruction introduced.

Daily review of all incidents involving children flagged re CSE, including missing person episodes and any issues identified raised with District Policing Command for learning purposes.

Central Referral Unit decision-making also reviewed as part of the above process when it relates to a child flagged re CSE.

PSNI assessment: Achieved.

INSPECTORS' ASSESSMENT

There had been an improvement in how the PPB ensured its response to child sexual exploitation was visible within monthly performance data and management meetings. Unlike during the full Inspection, data was disaggregated to specially monitor child sexual exploitation investigations. This included the timeliness of investigations, the quality of files and compliance with supervision requirements. Monthly reports were considered by the Head of PPB and examined at a regular Branch meeting. It was a challenge to draw out patterns and trends from the monthly reports. What the data meant for how well the PSNI was protecting children was unclear. The CRU was not featured within performance management data. All 'Joint Protocol'54 decisions to proceed by way of a single agency social services investigation were supervised by the CRU Detective Inspector but there was no global view of how well this was working.

Oversight of daily occurrences that related to children at risk of sexual exploitation were completed by the Child Sexual Exploitation Detective Sergeants and dip-sampling of child sexual exploitation assessments was undertaken by the Detective Inspector. There were processes in place to escalate concerns or delays to PSNI Supervisors and externally to the Senior Leaders within each HSCT and this was monitored. Missing reports and 'Concerns for Safety' were checked daily by the Child Sexual Exploitation Detective Sergeants who provided feedback to Districts where there had been concerns or areas for improvement in the frontline response. However, this was only in relation to children who had been identified at risk of child

⁵⁴ Protocol for Joint Investigation by Social Workers and Police Offices of Alleged and Suspected Cases of Child Abuse – Northern Ireland, Health and Social Care, PSNI, NSPCC NI, Revised Version April 2021 available at https://www.proceduresonline.com/sbni/files/joint_invest_protocol.pdf.

sexual exploitation. Inspectors were concerned about the response to missing children more broadly. The PSNI said that all missing person reports were reviewed daily in Districts at a Daily Management Meeting, and live matters reviewed at Area level.

The PSNI indicated that various internal and joint meetings with HSCT colleagues provided an opportunity to share best practice and give assurance about a consistent approach. There was no evidence that themes or matters of concern from meeting minutes were being collated to inform the strategic response. Monitoring 'concerns for safety', whether a requirement to complete the Philomena Protocol was causing delay in the PSNI accepting a missing report and reviewing thresholds for 'repeat missing' were among concerns identified within Follow-Up Review case audits that had in fact already been raised through these PSNI/HSCT meetings.

Strategic meetings were often a repeat of issues raised at operational meetings or focused on a reduction in the number of missing children reports without any interrogation or challenge around the quality of response, or if there was a sudden reduction or emerging patterns that would have benefited from further review.

A file audit by CJI raised immediate concerns about the PSNI response to missing children. There was evidence that missing children were being recorded as 'Concern for Safety' and therefore not receiving a missing person response or featuring in 'missing children' numbers. In these cases, the whereabouts of the child was unknown and the information available to Police about the child's circumstances showed they were at risk of harm. Inspectors were told about examples of children who were reported missing but visible at the end of the street or 10 minutes away in a local store. However, this was categorically not the type of circumstance encountered during the Inspectors' file review.

Across cases including when the child was recorded as missing, child-centred approaches were lacking with evidence of adultification and victim blaming language used. In one case where the child had been sexually exploited and continued to be at risk of sexual harm, a review recorded 'this is a resourceful lady' and assessed the risk of harm as 'low.' Data provided by the PSNI for 2020-21 to 2024-25 showed that on average about a quarter of children reported missing and assessed at risk of child sexual exploitation at the time of report, were graded as high risk and 8% as low.

It was important that the PSNI analysed how cases of missing children were graded, particularly where reports of missing children at risk of sexual exploitation had been graded low. There was limited evidence of return interviews and those that were recorded on the PSNI's information technology system yielded very little information. Inspectors could not see evidence that this was being led strategically to ensure improvements.

A small number of cases where a child sexual exploitation assessment had been completed were examined. Inspectors were generally assured of the immediate safeguarding actions around the child when they had been added to the child sexual exploitation framework. However, reviews appeared to result in no change and one child had been on the

framework since 2021. Where a decision had been taken not to include a child on the child sexual exploitation framework, Inspectors had concerns about the investigative actions including case allocation and consideration of potential human trafficking offences. In one case, there was an action to ensure return interviews were undertaken and recorded on the system if missing in future. There was no evidence that this had occurred. As discussed, Inspectors had a wider question about whether risk of harm was being identified appropriately in the first place and that children in the community were not featuring much within the child sexual exploitation or missing children data and frameworks.

In respect of safeguarding actions more broadly, it would have been beneficial to monitor if children were referred to support services, if special measures had been identified to help with giving evidence, and if all eligible cases referred for prosecution were being progressed to Court through the 'Under 13 Protocol'. Stakeholders told Inspectors that issues continued to occur in relation to the timeliness of referrals for support and the accuracy and completeness of information. Referrals to Social Services from the PSNI continued to be made by email on a 'Form 0.' This was not available on police systems and therefore not auditable. In cases reviewed, there was no information about the outcomes of such referrals.

Disruption tools were monitored within monthly PPB performance data and use of Child Abduction Warning Notices appeared to have increased. However, it was not clear if this was resulting in positive outcomes. The PBNI had been receiving Child Abduction Warning Notice notifications in relation to people subject to probation supervision, but the PSNI needed to check that the numbers held by it and the PBNI tallied; this was a matter for the PSNI to progress urgently as part of its quality assurance.

Despite being listed as a tool within the PSNI 'CSE Toolkit,' Risk of Sexual Harm Orders (RoSHOs) had not been used to tackle child sexual exploitation. Anecdotally, an application for a RoSHO had been challenging in this circumstance. It was important to interrogate the issues and understand why. Similarly, the sexual offences prosecuted and challenges in relation to this needed monitored. Victims who had been sexually harmed were entitled to an effective investigation capable of bringing a prosecution and children needed to see evidence of this. If the system was not successfully prosecuting sexual harm caused by child sexual exploitation, it was important to review and propose changes.

Information exchange internally within the PSNI was still important to check. The Modern Slavery Human Trafficking Unit had been subsumed within Organised Crime and in discussions with Police Officers, there was less awareness about those who held this expertise within the PSNI than during the full inspection. Youth Diversion Officers remained important in the PSNI response to children. They worked differently across Districts and often outside PPB's work. As the JICPA pilot

The 'Under 13 Protocol' was a pilot to expedite serious sexual offences cases involving witnesses under 13 years in Belfast, see Case Management in the Crown Court including protocols for vulnerable witnesses and defendants, practice Direction No. 2/2019, Issued by the Lord Chief Justice's Office 12 November 2019 available at https://www.judiciaryni.uk/files/judiciaryni/decisions/Case%20Management%20in%20the%20Crown%20court%20inlcuding%20Protocols%20for%20Vulnerable%20Witnesses%20and%20Defendants_0.pdf

found, Youth Diversion Officers were often the Officers attending Child Protection Case Conferences and engaging with family and children in a variety of contexts and it was crucial to include them in tackling child sexual exploitation. There was also potential to embrace the work of Concern Hubs, understand the differences in roles across Districts and how this linked with the PSNI strategic approach to child sexual exploitation.

Across various areas considered for this Follow-Up Review, not just within the PSNI, evidence of learning from quality assurance was a gap. CJI was not assured that the PSNI had a sense of key themes or patterns from quality assurance of its response to child sexual exploitation. Templates for routine dip sampling with question sets capable of extracting in-depth information about the quality and child-centeredness of responses were not available.

While recognising the daily monitoring and performance management work that was being undertaken, Inspectors assessed this recommendation as **Not Achieved**.

OPERATIONAL RECOMMENDATION 6

The Police Service of Northern Ireland address immediately the process of how it deals with cases of sexual activity between 14 and 15-year-olds so that practice is in keeping with the joint protocol.

Status: Partially Achieved.

ORGANISATIONAL RESPONSE

PSNI Update: The Police Service of Northern Ireland (PSNI) has addressed the issue of how cases involving sexual activity between 14 and 15-year-olds are managed, ensuring alignment with the Joint Protocol for the Investigation of Child Abuse.

Inter-agency Engagement: In September 2020, PSNI engaged with the Public Prosecution Service (PPS) and Health and Social Care Trusts to review and amend relevant sections of the Joint Protocol to reflect appropriate handling of such cases.

Protocol Update and Implementation: By October 2020, an updated protocol had been agreed across agencies. This was implemented immediately to ensure that investigative practice is proportionate, child-centred, and compliant with existing safeguarding frameworks.

This action ensures [the] PSNI's response in these cases is now fully in keeping with the Joint Protocol. The recommendation was formally approved for closure by ACC [Assistant Chief Constable] Crime on 8 November 2020.

PSNI assessment: Achieved.

INSPECTORS' ASSESSMENT

The PSNI with HSCT Social Work colleagues reviewed the current practice and requirements within the *Protocol for Joint Investigation by Social Workers and Police Officers of Alleged or Suspected Cases of Child Abuse* ('Joint Protocol'). It had set out steps for each agency to follow in a circumstance where a child aged 13, 14 or 15 years had been engaging in sexual activity with a person under 18 years of age (but not under 13). This had been clear that Social Workers and Police would investigate jointly where non-consensual sexual activity was suspected, or the child was under the influence of drink or drugs, or any other coercion or inequality. If the activity appeared 'consensual', Social Workers and Police were required to consider all available information and assess if there was a risk of significant harm to the child.

Factors to assess included:

- the nature of the sexual activity;
- the age and degree of vulnerability of the child;
- the difference in age between parties;
- any 'breach of trust' in the relationship of the parties (Article 28 The Sexual Offences Northern Ireland Order 2008);
- any aggravating factors, for example covert use of drugs, alcohol, use of force, exploitation etc;
- the child's thoughts and views on the matter; and
- any other relevant available information.

Where it was agreed that the child's best interests would be better met by a social care led intervention rather than a criminal investigation, the 2018 version of the Joint Protocol required, '[...] a copy of Form PJI 1 will be submitted via a 'prosecutorial advice request' to the Public Prosecution Service (PPS) for endorsement. Where an occasion arises whereby the PPS do not endorse 'no further police action' a recommendation of a joint investigation will be commenced, and a full file will be submitted.'

In practice, this had not been occurring at the time of the full Inspection. Following meetings between the PSNI, Health and Social Care and the PPS it was agreed that there should be no requirement to report these cases to the PPS after joint assessment by Police and Social Services. The amended Joint Protocol still required referral to the PSNI CRU in all such cases:

"...a criminal offence may not constitute abuse (e.g. consensual sex between two 15 year olds). In cases such as these, referral into the CRU is required with a proportionate response that is focused on principles of proportionality, least intervention and education rather than prosecution."

However, the step of submitting decisions for no further Police action to the PPS had been removed. The rationale was to ensure a proportionate response and to reflect the practice that, in appropriate cases where a social work intervention was in the child's best interests, minimal information by agencies was retained:

- 'In cases of 'no further action' neither party will be recorded as a suspected offender on police information systems.'
- 'However, police and other agency information systems will be updated on information on all parties involved. This includes that the activity between both parties was deemed consensual, age appropriate and there were no aggravating factors, as per the assessment. This may need to be considered in the context of the 'right to be forgotten' in GDPR.'

The PSNI had also reviewed its supervision requirements and, all such decisions were being reviewed by the CRU Detective Inspector. Although the PSNI had not been routinely monitoring this data, figures provided by PSNI analysts showed that there had been less than 30 cases of sexual activity between children 13 to 16 years of age in which a decision for No Further Action was taken over the last three financial years (2022-23 to 2024-25).

The PPS guidance had also acknowledged the complexities in these cases for prosecutorial decision-making:⁵⁶

'The public interest may not always require prosecution of young persons who engage in sexual activity, and who are of the same or a similar age and understanding, provided that the activity is ostensibly 'consensual' and there are no aggravating features such as coercion, exploitation or threatening activity. In such consensual cases, where no aggravating features are present, resolution may be best achieved by arranging education for the young person and providing them and their families/guardians with access to advisory and counselling services.'

It required Prosectors to balance all relevant factors in reaching a decision and ensure that all information, for example, from Social Services and Education had been considered.

Inspectors acknowledged the reasons for the approach, which was to ensure the best interests of children in cases where Social Services and the PSNI were satisfied there was not a risk of significant harm. Inspectors would have welcomed data around the degree of agreement between the PSNI and PPS to inform the decision to change, for example, how often the PPS had not endorsed the decision for 'no further police action' and what the reasons for disagreement had been. Greater visibility of the outcome of supervisory reviews would also have been beneficial. At the time of this Follow-Up Review, although overall numbers were small, the rate of agreement or divergence from the original decision, factors giving rise to this and any learning or advice was not available.

⁵⁶ PPS, Guidelines for the Prosecution of Young People December 2021 available at https://www.ppsni.gov.uk/publications/guidelines-prosecution-young-people.

Inspectors would have been more assured if the PSNI had been monitoring any trends or learning through regular quality assurance.

Given the changing nature of sexual exploitation and the learning that organisations continue to experience, greater oversight through dip-sampling would have been beneficial to ensure more robust oversight in relation to cases in which no further action was taken. Continued liaison with the PPS in relation to relevant aspects of the joint protocol and any reviews would also be important.

For this reason, Inspectors assessed this recommendation as **Partially Achieved.**

OPERATIONAL RECOMMENDATION 7

In developing its quality assurance of decision-making in sexual offence cases, the Public Prosecution Service for Northern Ireland should:

- purposively sample child sexual abuse cases;
- work with the Police Service of Northern Ireland to develop quality assurance
 of child sexual exploitation related cases including where the offence is
 not sexual such as child abduction, or where the child comes to the Public
 Prosecution Service for Northern Ireland's attention as a suspect; and
- within this assess how understanding about exploitation and grooming is reflected in decision-making with a view to informing practice improvements.

Status: Partially Achieved.

ORGANISATIONAL RESPONSE

February 2023 Update

- Work in this area was delayed due to the [COVID-19] pandemic.
- A list of CSA [Child Sexual Abuse] offences has been compiled with a view to these cases being purposively sampled once resources are less focused on dealing with the current backlog of cases.
- Two new procedures have been agreed between PPS and PSNI.
- PSNI will add a 'box' onto the Prosecutor Information Form (PIF) to indicate to PPS if a victim or a suspect in the case is considered to be or to have been at risk of CSE. This will enable prosecutors to easily identify these cases and to follow the guidance in the Staff Instruction referred to at OR2 [Operational Recommendation 2] above. We await confirmation of an IT [Information Technology] fix to implement this.
- PPS is waiting for confirmation that CSE cases will be 'flagged' on Causeway⁵⁷ to enable identification of these cases for sampling.
- Whilst changes to the Prosecutor Information Form (PIF) have been approved the amended form is not yet in operation but the training is under development and will compliment an internal guidance document which is due to be circulated to all staff shortly.

PPS February 2024 update

• CSE cases now form part of monthly dip sample and after an initial 12-month period a review of any issues raised through the dip sample will be carried out.

PPS Update February 2025

• Changes were made to the Prosecutor Information Form (PIF) and from 5 August 2024 the following questions have been added: "Is any victim or suspect at risk, or previously at risk, of child sexual exploitation? [...]

INSPECTORS' ASSESSMENT

The PPS had included quality assurance of a sample of child sexual abuse cases within its monthly audit of sexual offence cases. This ensured a 'quality standards review' against elements of the Code for Prosecutors. Areas examined included whether the reasons for the decision were properly recorded, if all necessary information was requested and if the decision was taken in accordance with the Code for Prosecutors and in a timely manner. Areas subsequently added related to outlining Public Interest factors if these had been the basis for a decision not to prosecute, and whether the evidential test was met in respect of the directed charges. There were no qualitative comments. For the period August 2023 to March 2025, all queries across files reviewed were met with no reminders to staff or training needs identified.

The quantitative measures provided assurance about application of the Code for Prosecutors but issues of relevance to child sexual exploitation could not be drawn out. For example, whether opportunities were maximised to build evidence-based prosecutions, to tackle anticipated attacks on the credibility of the victim, and to set out considerations of child sexual exploitation and human trafficking in written reasoning. An examination of safeguarding actions, whether special measures and supports were identified for the victim in a timely way, and whether communication with the victim was accessible and child-centred, would have been important.

It had not been possible to tell from the check sheet provided to Inspectors if any of the reviewed cases related specifically to child sexual exploitation. This would be important because of societal myths that prevail in this context including the tendency to blame victims and view older child victims of sexual exploitation particularly those aged 16 and 17-year-olds as having 'consented.' The PPS was hopeful that a 'tick box' added to the Prosecutor Information Form in August 2024 would enable identification of cases involving child sexual exploitation for quality assurance. Cases for monthly quality assurance had been sampled from the PPS SCU and sampling from other PPS Divisions would have been beneficial.

Inspectors reviewed 10 cases from a sample of files passed to the PPS by the PSNI PPB. Positive practice was found when comprehensive information was available and there was evidence that all relevant circumstances had been considered by the Prosecutor.

In most instances, however, the voice of the child was not adequately reflected and early engagement, including in relation to special measures, was inconsistent. Where the child was a victim and a suspect this needed to be better addressed. Early strategic planning by the Police Officers and Prosecutors and a focus on circumstances leading to vulnerability rather than solely the child's actions required improvement.

The PPS had worked with the PSNI to develop a strategy on serious sexual offences. This was positive although it had not been finalised at the time of this Follow-Up Review. On agreement and implementation, it was hoped that joint training would follow. Beyond this, the PPS has not moved forward to undertake, with the PSNI, joint quality assurance of child sexual exploitation cases and had not yet been able to include cases related to child suspects in its sampling. Each organisation had significant resourcing pressures and capacity for quality assurance was part of this. However, it was important to enhance learning and maximise child safeguarding. The Inspectors' review of the sampled PPS cases found varying quality in the files that had been submitted by the PSNI. A full picture of the child's circumstances had often not been provided, which was crucial for effective decision-making.

Learning about how exploitation and grooming was being reflected in PPS decisions relating to child sexual exploitation was not apparent within the documentation provided to Inspectors. CJI acknowledges that the training rolled out to PPS staff covered aspects of this. A February 2024 update from the PPS had indicated that, after an initial 12-month period of dip-sampling child sexual exploitation cases, there would be a review of any issues raised. The lack of qualitative commentary meant that extracting learning to inform improvements would be a challenge. The PPS had made significant improvements in the guidance available to support decision makers in cases involving sexual exploitation of children. Progressing actions outlined in response to this recommendation was an essential next step to assess how guidance was being implemented.

Inspectors assessed this recommendation as **Partially Achieved**.



CHAPTER 3: CONCLUSION

Individuals across the criminal justice system were dedicated to tackling child sexual exploitation, bringing perpetrators to justice and ensuring the protection of children. Inspectors met many who had been working to progress disruption activity while aiming to ensure immediate risks were tackled. Multi-agency training opportunities, revision of policies by the PPS, and the continued drive by the PSNI to build a comprehensive partner Problem Profile were also among the positive developments Inspectors found.

Child-first responses needed embedded in how all parts of the criminal justice system responded to children. CJI acknowledged that ensuring a child-first response to missing children, especially for children living in care, required a strategically led and co-ordinated partnership approach. There were, however, very real and worrying signs that resource pressures were influencing policy and practice rather than a more timely and proactive response in the best interests of the child. Criminal justice leaders should have had more sight of this, as well as how successfully child sexual exploitation was being prosecuted.

Out of the two Strategic and seven Operational recommendations, Inspectors rated one as Achieved, six Partially Achieved, and two Not Achieved. In many instances this had not aligned with the organisations' self-assessments of progress. While organisational judgements had been based on a point in time, CJI was assessing whether outcomes had been achieved long term. For various reasons, positive progress achieved at the time of the full Inspection self-assessment in 2020 had not been sustained and there was limited evidence of a longer-term track of this. It demonstrated a challenge in ensuring ownership of recommendations to achieve long term outcomes as opposed to actions in the short term.

Recommendations Achieved, Partially Achieved, Not Achieved (Organisation(s) and CJI judgements)

| | Organisation(s) judgement | CJI's judgement |
|---------------------------------|---------------------------|--------------------|
| Strategic Recommendation 1 | Partially Achieved | Partially Achieved |
| Strategic Recommendation 2 | Achieved | Partially Achieved |
| Operational Recommendation 1 | Achieved | Achieved |
| Operational Recommendation 2 | Achieved | Partially Achieved |
| Operational Recommendation 3 | Achieved | Not Achieved |
| Operational Recommendation 4 | Achieved | Partially Achieved |
| Operational Recommendation 5 | Achieved | Not Achieved |
| Operational Recommendation 6 | Achieved | Partially Achieved |
| Operational Recommendation 7 | Partially Achieved | Partially Achieved |

There was opportunity for leaders to grasp key challenges in operational practice that would have benefitted from a strategic solution. For example, the PSNI rated Operational Recommendation 3 for an adequately resourced and consistent response to child sexual exploitation as Achieved. CJI judged it Not Achieved. At the time of the Follow-Up Review the PSNI had been unable to fully resource its PPB Child Sexual Exploitation team, indeed CJI understands Officers had been abstracted to deal with public disorder, and no contingency plan was in place. There was significant scope to ensure that strategically, the criminal justice system was aware of this and monitoring how it was impacting the State's overarching obligation to protect children from sexual abuse.



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