



children's charities' coalition on internet safety

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Dear Mr Lawrence,

The future of CEOP

The Children's Charities' Coalition on Internet Safety (CHIS) welcomes this opportunity to comment on "Policing in the 21st Century: Reconnecting police and the people" (Cm 7925, July 2010). Rather than address every issue raised in the White Paper we have confined our remarks to those parts of it which discuss the future of the Child Exploitation and Online Protection centre (CEOP) .

The institutional arrangements within which CEOP will be expected to operate going forward is a matter of direct concern to us.

We were never convinced that CEOP fitted well with SOCA's much larger mission and CHIS was not alone in that view. It was also commented on in the HMIC report as well as by others who took an independent look at CEOP's operational effectiveness. It would be regrettable if those past weaknesses or misalignments were repeated or possibly even exacerbated by putting CEOP into another large formation where, at the highest levels of management and control, there was little knowledge or understanding of the very particular nature of the issues CEOP deals with and consequential operational exigencies.

CEOP is a dedicated and specialised child protection agency. It embraces a number of disciplines that go far wider than conventional or traditional policing concerns. Because of its specialized focus CEOP has been able to accept that other disciplines are essential to a holistic approach to child protection, especially in the still relatively new environment of the internet.

If an organization created to protect children does not have such a focus at its core then the risk of failure and the risk of harm to children increases. Lord Laming concluded that safe and effective child protection practice relies upon child protection knowledge running throughout an agency, with a clear chain of accountability from the very top to the very bottom. In the putative National Crime Agency (NCA) we would be concerned that such a line of accountability would be hard to discern.

CEOP has put the interest of the child at the heart of its work and is closely supported in doing so by professional child protection teams. These child protection teams are not in any sense seen as being subordinate or inferior to mainstream investigative work or operational policing. They are valued as equal partners. In a more generic police environment we would be concerned that this method of working or this attitude would be diluted or would disappear altogether. In particular we would be concerned about how it might make and maintain links with other non-police based agencies that are concerned with child protection.

CEOP has not been afraid to embrace new areas of work which are essential to its success. We are thinking particularly of the work it does in schools and with its Youth Advisory Panel. These underscore both the novelty of CEOP's modus operandi and its consequent, contingent success. Again we are fearful that these would be lost in a larger agency where child protection would only be one of many areas of interest. The internet is still comparatively new for many people. It can change very rapidly. This puts a very high premium indeed on the police being able to plug into the thinking of young people and CEOP has found a way to make that work.

The resourcing issue is clearly key. Whilst we accept that of course CEOP must never be dependant on external agencies for funding any of its core functions, CEOP has nonetheless been able to draw in many more resources, particularly from the private sector. Unless some degree of separation is established, as between the NCA and the new CEOP, it may be difficult for the new CEOP to continue to be able to leverage private sector and other sources of funding in the way that it has hitherto.

In the early 2000's CHIS joined with substantial parts of the UK-based internet industry in calling for the creation of what later was to become known as CEOP. CHIS and the industry had a shared interest in wanting to see two things:

1. Just as criminals are no respecters of police authority boundaries within the UK, so the arrival of the internet made even national boundaries irrelevant in relation to some classes of crimes, including crimes against children and young people.

The National Hi-Tech Crime Unit (NHTCU) and the Paedophile Online Investigation Team (POLIT) for a while played a key role in bringing together major intelligence packages and liaising with colleagues nationally and internationally around online child protection issues.

Dealing with child abuse images and other aspects of online child protection was a significant part of the NHTCU's workload and most certainly both issues were respected and treated seriously. However, they introduced a new set of disciplines which crept up on them. They were not

really part of the original design. Within the NHTCU the major focus was on financial crime and POLIT was not resourced to deal with the deluge that was advancing, Operation Ore being a classic case in point.

Initially the arrival of the internet led to considerable confusion within the police service as to how basic things such as receiving reports of suspected criminal behaviour should be handled. It was typically very difficult for anyone, let alone an end user, to discern where exactly a crime was happening. In a way that was often part of the point of the crime. Criminals sought to exploit these uncertainties about jurisdiction and location. In relation to dealing with child abuse images on the internet this had been satisfactorily resolved with the emergence of the Internet Watch Foundation but comparable arrangements had not developed in any other area. For this reason CHIS and the internet industry made common cause.

There needed to be a focal point for organizing and analyzing intelligence, for co-ordinating across police and national boundaries and for taking responsibility for ensuring that the right information landed on the correct virtual or actual desk as speedily as necessary. No individual force had the authority or the capacity to do that.

As new interactive services started to come on stream members of the public also increasingly needed to have their own mechanisms for making reports to the police about online activity which might be putting a child at risk. In that connection the CEOP "Report Abuse" function has become well established.

2. Pre-CEOP there were only three major police forces in England and Wales that had the capacity to develop the technical and human resources needed to mount effective investigations into online crimes against children and young people: West Midlands, Greater Manchester and the Met. Moreover it was very hard to see how some of the smaller forces would ever be in a position, economically, to step up to the new challenges. Even within the established "Big Three" there were countervailing pressures. Chief Constables and the Commissioner of the Metropolitan Police will naturally be drawn to prioritise immediate local policing needs. Faced with a choice of authorising what could turn out to be a long, complicated, resource intensive and expensive internet investigation which may turn out only to affect the residents of Salford, Edgbaston or Walthamstow only tangentially, if at all, it is not hard to guess what sometimes happened.

Here again CHIS and the industry shared a common goal: we both wanted to see the emergence of a substantial body of expertise in collecting and analyzing intelligence about internet based criminal behaviour which particularly affected children and young people. Moreover it was, and of course still is important that this resource is there and available round the clock. Too often we had heard about key personnel being taken off important internet based child protection investigations in the "Big Three"

to lend a hand with other cases¹. Not only was this wrong in itself, it sent out entirely the wrong message about the importance attached to child protection investigations. We very strongly reject the proposition that child protection is a luxury or the first that can be dropped when “something more important” happens.

Thus in whatever emerges from the current discussion of reorganizing the police service we think it will be vitally important to preserve both of the above: clear reporting lines linked to a single point of contact for the police and operational independence so as to guarantee that child protection activities are not compromised or inhibited by the vicissitudes of other criminal investigations.

There are a number of related points which are of some importance to us:

- CEOP has also been an energetic leader of global policing efforts in child protection online, and has been a very effective single point of contact for overseas police bodies that need a clear point of entry to the UK jurisdiction.
- Within a larger police agency, such as the proposed NCA seems likely to be, the expertise, resources, contacts, networks and perhaps above all the approach which CEOP has developed will be dissipated or lost, or will be difficult to maintain.
- Having said all that there may still be a case for considering a name change for the new agency. The arguments are finely balanced: on the one hand CEOP has undoubtedly established a strong brand and changing its name and livery would undoubtedly eat up some of the scarce resources, on the other its name simply does not convey to the public exactly what the agency is about. The word “exploitation” in particular does not have the same resonance in the UK and Europe as it plainly does in the USA.
- Finally in relation to CEOP, we observed earlier how important it was that child protection should not be thought of as being a branch of policing that was only of a second-order of importance. In that connection CHIS believes the Government should take the opportunity of this review of policing priorities and organization to put child protection on an equal footing with other national policing priorities.
- One of the reasons the “Big Three” police forces referred to above might have felt they had permission from time to time to move resources out of child

¹ This even happened within the Home Office. During a perceived crisis about the backlog of immigration appeals the principal civil servant responsible for driving forward the activity of the (then) Home Secretary’s Internet Task Force on Child Protection simply “vanished” for over six months. He had been redeployed to the immigration section. The Parliamentary Under-Secretary of State with prime responsibility for the Task Force first learned of this redeployment when he was contacted by CHIS to query why the Task Force’s main resource was no longer available. The impact of this decision was very demoralising for all concerned. If the Government truly attached such high importance to the issue and to the idea of self-regulation and to the Task Force how could this have happened? Did this not undermine the whole basis of the self-regulatory model? Everyone else sends along key staff to attend meetings and take part in policy-formulation on these issues but the Government can bring everything to a halt because of a media outcry on a completely unrelated matter.

protection into other areas of concern is because child protection did not get measured and assessed by the Inspectorate or the Home Office in the same way as other areas of crime did. Sadly the motto too often is “If it doesn’t get measured it doesn’t count.” That must change.

We would be happy to elaborate upon or develop any of the points made in this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read "John Carr". The signature is fluid and cursive, with the first name "John" being larger and more prominent than the last name "Carr".

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