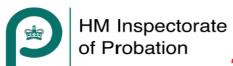
# Agenda Item 7









# 12 February 2024

Jane McSherry, Executive Director of Children's Services, London Borough of Merton Justin Roper, Executive Lead, Clinical Commissioning Group Sophie Linden, Deputy Mayor of London for Policing and Crime Sir Mark Rowley, Commissioner of the Metropolitan Police Service Michelle Waldron, Youth Offending Service Manager Sarah Lawrence, Independent Scrutineer, Merton Safeguarding Children Partnership

Dear Merton, Local Safeguarding Partnership

# Joint targeted area inspection of London Borough of Merton

This letter summarises the findings of the joint targeted area inspection (JTAI) of the multi-agency response to serious youth violence in Merton.

This inspection took place from 4 to 8 December 2023. It was carried out by inspectors from Ofsted, the Care Quality Commission (CQC), His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) and His Majesty's Inspectorate of Probation (HMIP).

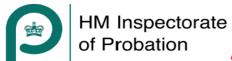
#### **Context**

The findings in the report evaluate the effectiveness of the multi-agency response to children aged 10 and over who are at risk of, or affected by, serious youth violence and/or criminal exploitation. Even where the report does not specifically refer to this group of children, all findings relate to this scope.

The inspectorates recognise the complexities for agencies in intervening to address serious youth violence when risk and harm occur outside of the family home. Consequently, risk assessment and decision-making have a number of complexities and challenges. A multi-agency inspection of this area of practice is more likely to highlight some of the significant challenges to partnerships in improving practice. We anticipate that each of the joint targeted area inspections (JTAIs) of this area of practice that are being carried out will identify learning for all agencies and will contribute to the debate about what 'good practice' looks like in relation to the multi-agency response to serious youth violence. In a proportion of cases seen by inspectors, children had also experienced other forms of abuse, which reflects the complexity of the needs and risks for children.

#### **Headline findings**

Most vulnerable children in Merton affected by serious youth violence and/or criminal exploitation benefit from effective strategically aligned and integrated partnership arrangements. These arrangements are underpinned by comprehensive joint contextual safeguarding strategies that include a holistic analysis of factors that









make children more vulnerable to serious youth violence and criminal exploitation, those missing from home and those exploited by organised gangs. This provides a shared understanding for prioritising and meeting children's needs.

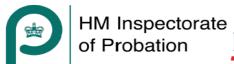
Strategic partners are largely aware of the extra-familial harm complexities involved in preventing further risk to children affected by serious youth violence and/or criminal exploitation in their local area and neighbouring boroughs. They respond swiftly together to ameliorate emerging risks to children in local communities.

The London Violence Reduction Unit (VRU) nominated professional links with the 'Safer Merton' Community Safety Partnership (CSP) leads across the borough. Clear communication rooted in a prevention and early intervention ethos ensures that children's experiences inform decisions. These favourable conditions are strengthened further by flexible operational service planning. They successfully attract funding to develop innovative practice models across the spectrum of services. Visible strategic leaders and elected members have an accurate understanding of the collective local and national challenges they face.

Merton's distributed learning approach has created a tangible culture, where most staff understand that children's experiences can contribute to children being violent and/or exploiting other children. Nevertheless, despite the individual efforts of committed police officers, the absence of a child-centred policing strategy in London is contributing to a disjointed and inconsistent service to children affected by serious youth violence and/or criminal exploitation. Officers are not aware of the strategic intent of the force. In addition, they lack the requisite training, skills, knowledge and capacity to work effectively in this complex area of policing. These findings concur with the recently published His Majesty's Inspectorate of Constabulary and Fire & Rescue Services inspection of the Metropolitan Police.

Most leaders across the multi-agency partnership, which includes the police, health services, children's social care, youth justice services (YJS), schools, youth services and voluntary sector organisations, are unremittently committed to placing children's needs and safety at the centre of their work. They accept that the quality of practice for some children known to professionals for extended periods is inconsistent and needs to be strengthened.

Leaders are cognisant that children with neurodiverse and social communication needs, and Black Caribbean and African boys and young men, are disproportionately affected by serious youth violence and/or criminal exploitation in the borough. Collectively, leaders have taken prompt action to reduce harm for these children. Merton is the fourth safest borough in London; it is the only borough with a reduction in neighbourhood crime. Assiduous work and shared objectives by the









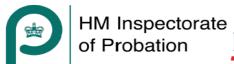
partnership have reduced knife-enabled violence by 8% and serious violent robberies by 16%.

Targeted work by the Merton Safeguarding Children Partnership (MSCP) to raise awareness about the adultification of Black children and those from a minority ethnic background is helping to build trusting relationships with children, which is a key priority for the partnership. While specialist health professionals are co-located across teams to support children with speech and language, and emotional health challenges, children with neurodiverse and social communication needs who are vulnerable to violence and criminal exploitation are not identified soon enough or prioritised for intervention.

YJS leaders are well connected at a strategic level and the youth justice plan is aligned with wider partnership priorities in relation to serious youth violence and/or criminal exploitation. Leaders have reconfigured services effectively to maintain a specific focus on work to address serious youth violence by working collaboratively with the social care contextual harm team, health commissioned services and school leaders. Professionals work conscientiously to avoid unnecessarily criminalising children and have maintained low levels of first-time entrants into the youth justice system.

# What needs to improve?

- The development of a cohesive child-centred policing policy for London.
- Child-centred training for police officers across all teams and services in responding to and investigating crimes for children affected by serious youth violence and/or criminal and sexual exploitation.
- Rigorous management oversight and consistent child-centred decisions in the police custody suite when children are arrested and searched.
- The frequency of the strategic multi-agency partnership oversight, scrutiny and audits of children affected by serious youth violence and/or criminal and sexual exploitation.
- Identification and fast-tracking of referrals by health professionals for children with neurodiverse and social communication needs who are vulnerable to serious youth violence and/or criminal and sexual exploitation to ensure that they can access appropriate support quickly.
- The time that children in care wait for an initial health assessment through the appointment of a designated doctor.
- The quality and impact of supervision and contingency planning for children known to children's social care and other agencies for extended periods of time.
- The consistent and prompt sharing of strategy meeting minutes and decisions with the police, school staff, health colleagues, the London Ambulance Service (LAS) and commissioned services.





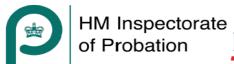




- The consistent use, and review, of the contextual harm risk matrix tool and regular review of children's plans to prevent drift when there are changes to social workers.
- Systems for consistent sharing of information and intelligence between the YJS, the police and Probation about adults who pose a risk to children affected by serious youth violence and/or criminal and sexual exploitation.
- Better sharing of information, communication and involvement with the LAS, strategically and operationally.

# **Strengths**

- Co-located professionals in the multi-agency safeguarding hub (MASH) work together effectively to identify, and provide help and protection for, children who are at risk of, or affected by, serious youth violence and/or criminal exploitation.
- Strategic leaders make continuous and strenuous efforts to respond swiftly to evolving risks to children and to collectively drive forward innovation and improvement.
- Targeted initiatives and projects delivered jointly across the borough are reducing risks to children affected by serious youth violence and/or criminal exploitation. Local places and spaces are made safer for children because of these interventions.
- Children who are victims of serious youth violence benefit from coordinated care and support when attending St George's Hospital emergency department. Staff with requisite knowledge and skills collaborate closely with the police and children's social care to keep children safe in hospital.
- Strong multi-agency relationships, both operationally and strategically, mainly result in effective communication and information-sharing between the services.
- Joint mapping of children's relationships, including cross-borough planning and coordination, helps to identify potential risks, such as county lines and unsafe locations. A key example of this is the daily meeting between the pupil referral unit (PRU) and school police officers, in which live information about children at high risk is shared effectively.
- The police have a youth integrated offender management (YIOM) team that, together with partner agencies, provides a child-centred wraparound safeguarding response to children in the criminal justice system.
- Tenacious child-centred practice with children and young people by skilled practitioners and police officers in the social care and police child exploitation teams is contributing to reducing risks and protecting them from further harm.
- The weekly multi-agency Liaison and Diversion meeting consistently considers children who come to the notice of the police when there are concerns about their vulnerability. Professionals act to provide voluntary support to divert children from courts.









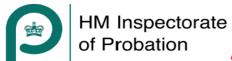
- The weekly police-led Merton Violence Communication meeting is well established across the partnerships. It is a highly effective vehicle for sharing real-time intelligence about risks to individual children and in local areas. It includes operational leaders and frontline practitioners from key agencies. Staff and police officers know children well. Appropriate and timely actions about these children are agreed with individual professionals.
- Children in care placed out of borough due to serious youth violence and those in custody in a youth offending institute receive a prompt health assessment by the designated looked after children's nurse. The virtual school plays a crucial part in supporting children and young people at risk, including those who are in care and placed outside the area. It has forged strong partnerships with other boroughs to ensure that the same robust systems apply to all children, wherever they are placed.
- Schools and other education providers use a range of well-established systems to identify children at risk of, or subject to, serious youth violence. Education partners are well represented on a range of panels. They play a key part in both the strategic and operational aspects of this work. This enables education leaders to build a clear understanding of the potential risks and needs in the local area, including places and spaces.
- A public health approach helps to deliver initiative-taking early intervention for those children at risk, for example a focus on school attendance and recognition that anti-social behaviour can lead to more serious criminality and exploitation.
- Learning from practice and rapid reviews of children affected by serious youth violence have directly informed the MSCP training programme delivered to practitioners and managers.

# **Main findings**

The multi-agency morning meeting in the MASH provides an effective forum for swiftly sharing information with relevant professionals in real time about children affected by serious youth violence and/or criminal exploitation. Social care staff, together with co-located partner agencies, understand the relevant thresholds of need, risk and harm. This ensures that most children and their families are identified quickly and are provided with help, support and protection.

The consistent use of a screening tool for children at risk of serious youth violence and extra-familial harm assists staff in the MASH to identify levels of risk and harm to children. Contacts are promptly screened by a consultant social worker, and recorded decisions by managers about the next steps to help and protect children are clear.

The police use a different child exploitation risk assessment and management tool to grade exploitation risk and determine case ownership. This can cause confusion when two tools are in use. Police officers submit referrals to the MASH when children









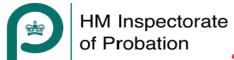
are victims of serious youth violence or criminal exploitation, but do not consistently recognise the safeguarding issues and risks for children who are suspected of causing offences, for example when children are arrested. During the inspection, leaders had to act to improve the quality of care, protection and support provided to children affected by serious youth violence and/or criminal exploitation when they are arrested and searched in police custody. In addition, not all health partners consider the associated risks of serious youth violence and/or criminal exploitation within their risk assessment tools. Consequently, there are missed opportunities to intervene early to prevent harm from escalating.

The health navigators based in the MASH attend all strategy meetings and share health information. The Metropolitan Police have invested in a specialist contextual harm sergeant who provides essential intelligence about children at risk and adult perpetrators of harm. Minutes and decisions following strategy meetings are not shared promptly across the partnership. This means that not all practitioners involved with the child have the most up-to-date and overarching plan.

When children go missing, there is a systematic approach to ensuring that these children are discussed at a weekly missing meeting, and that they are referred to a dedicated service for a return home interview. Risks for missing children affected by serious youth violence and/or criminal exploitation are evaluated at the multi-agency child exploitation (MACE) meeting. Most return home debriefs completed by the police are done over the phone, and some missing children are not spoken to directly. This means that the police could be missing important information and intelligence that could help reduce future risk to vulnerable children.

Many children affected by serious youth violence and/or criminal exploitation benefit from a well-coordinated array of services that provide help at an early stage. Children requiring a child-in-need or child-protection plan are transferred quickly to the assessment and safeguarding teams in children's social care. Most child assessments are thorough and child-centred. Diligent work to build trusted relationships with children by statutory and commissioned services is central to the work of practitioners, with strong examples evident of direct work by staff who know children well. While assessments and screening tools identify children's needs clearly in the MASH, they are not routinely updated or adapted to subsequent changing needs and risks by the partnership. This limits professional understanding of escalating harm for these children.

Some children affected by serious youth violence and/or criminal exploitation have been the subject of multiple previous assessments and interventions for abuse and neglect, sometimes over many years. Practitioners and their managers understand that children's lived experiences and childhood trauma can contribute to children being victimised and/or exploiting other children. Despite this, in a small number of children's cases, the current work is limited to evaluating risks outside of the home.









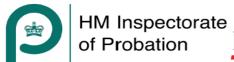
Management supervision is insufficient for these children as the focus is too narrow, with incomplete evaluations about children's wider lived experiences. This impacts the quality of plans and the analysis of whether changes to children's lived experiences can be sustained. This is exacerbated when there are changes in social workers.

Most children known to the YIOM team benefit from an enhanced child-centred wraparound safeguarding response. Officers and staff in these teams understand the experiences of children and the importance of working collaboratively with other statutory agencies and voluntary sector staff, who assist in building connections with children. Daily police risk meetings and weekly partnership meetings ensure that the risks to children are reviewed and appropriately escalated to the pre-MACE forum.

Nevertheless, there is too much inconsistency across various Metropolitan Police teams as children are investigated by multiple teams of officers, the majority of whom have not been trained in working with children affected by serious youth violence and/or criminal exploitation. In a small number of children's cases brought to the attention of leaders during the inspection, the absence of a cohesive Metropolitan Police child-centred culture and strategy means that risks for some children are missed, or their vulnerabilities are not recognised or understood by police officers, thus leaving children exposed to harm.

Children involved with the YJS have access to a wide range of interventions and support to meet a spectrum of needs, several of which underlie children's offending behaviour and increase their vulnerability to serious youth violence and/or criminal exploitation. Children receive holistic services in the YJS, with access to nurses, speech and language support, forensic psychiatrists and youth offending workers. This ensures that children's physical and mental health needs are identified and met, as well as education being provided, to prevent reoffending. Staff work effectively with partner agencies to support young people in making safer choices linked to their substance misuse and in managing their vulnerability linked to serious youth violence. The views of children and parents are included in the discussions and plans.

Leaders in social care have realigned the contextual harm team to maintain a specific focus on work to address serious youth violence and criminal exploitation. Children's cases have been reallocated to appropriate social work teams, thus increasing capacity for co-working, advice and training for partners on issues around contextual harm and exploitation. A substantial number of children known to the YJS are also allocated to social workers. Communication between Probation and the YJS about adults who pose a risk to children is inconsistent, leading to incomplete risk assessments. Practitioners and managers understand the cohort of YJS children and their profile, including the issues of disproportionality. There is limited evidence of how concerns about the over-representation of children from diverse backgrounds









and cultures are being addressed on a day-to-day basis. Leaders are not complacent and have commissioned a specialist to evaluate their practice in this area.

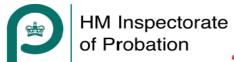
Schools and other education providers use a range of well-established systems to identify children at risk of, or subject to, serious youth violence. Education partners are well represented on a range of panels. They play a key part in both the strategic and operational aspects of this work. This enables education leaders to build a clear understanding of the potential risks and needs in the local area, including places and spaces. Education leaders speak of strong and effective communication with other agencies in the local area. They feel well supported in identifying and meeting the needs of these children and young people. Everyone understands the importance of education as a protective factor. There is a clear focus on partners working together to support children to remain in education.

The work of Melbury College and the virtual school is a key strength in this work. Overall, education exclusions are in line with London and national averages. Leaders acknowledge that there are challenges in the lack of availability of suitable alternative education provision currently. They have responded promptly to this. For example, Melbury College has expanded the range of vocational courses available to children and young people. Effective preventative work takes place with the PRU, including timed placements, training and support. However, sometimes, decision-making around permanent exclusions is more challenging due to the lack of options available.

The virtual school plays a crucial part in supporting children in care placed outside the borough. It has forged strong partnerships with other boroughs to ensure that the same robust tracking systems apply to all children, wherever they are placed. This robust attendance tracking, and the strong partnerships, allow leaders to get children the right help at the right time, particularly in terms of intervening before any potential suspensions, and therefore reducing the risk of any permanent exclusions.

Health partners are equal and active contributors at strategic and operational levels. Information-sharing across the health agencies visited is strong. All safeguarding teams can access health partners' records. This increases their understanding of the wider circumstances of children and their families, which improves safeguarding decisions for children affected by serious youth violence and/or criminal exploitation. The specialist school nurse service plays a vital role for children outside of mainstream school and those with higher levels of need.

When a child in care is placed out of borough due to serious youth violence or in a youth offending institute, the looked after children's nurse completes their health assessment review and consults swiftly with the placing borough or the young offenders institute health teams to ensure that there is no drift in health actions being progressed. Merton does not currently have a designated doctor for children in







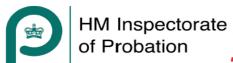


care. Epsom and St Helier Hospital is commissioned to undertake the initial health assessments. Currently, children are waiting too long as, on average, it can take up to six weeks for their initial health assessments rather than the statutory requirement of 20 days.

Children who are victims of serious youth violence benefit from coordinated care when attending St George's Hospital emergency department. Positively, young people seen at St George's are managed by the paediatric service until the age of 18, allowing a continued focus on the young person as a child. Staff caring for them have an increased knowledge of safeguarding issues. Effective processes ensure a multi-agency approach to the immediate safety planning for children's next stage of care. Staff work closely with the police to manage the safety of children and young people; this is supported by internal security systems. Police passwords are quickly shared to ensure that information-sharing on the child is managed, and referrals to social care are made promptly. A dedicated commissioned service funded by the VRU provides sensitive support for families and advocacy to help children to extricate from criminal exploitation.

Children in Merton receive a timely response when referred to child and adolescent mental health services (CAMHS). Most children are assessed and seen for treatment within 14 weeks. CAMHS has developed specialised roles within social care, the PRU and the YJS. A single point of access and a flexible approach prioritise children who are a risk to themselves or others. Risk assessments are evident in all children's records, although there are no specific prompts to support consideration of children affected by serious youth violence and/or criminal exploitation. The South West London and St George's Mental Health NHS Trust recognises that children with neurodiverse and social communication needs who are vulnerable to violence and criminal exploitation are not prioritised for intervention. In the last quarter, waiting times were within the 18-week target. Recently, however, due to demand, the waiting time for assessment to treatment has increased considerably. More work is required by the partnership to include the LAS at a strategic level in Merton. The LAS routinely requests feedback for all its safeguarding referrals in London but does not always receive information from children's social care in Merton. The LAS has recently been invited to the MSCP Promote and Protect Young People subgroup but does not have the capacity within its safeguarding team to attend. Effective work by the LAS with the Metropolitan Police and London Fire Brigade as part of a safety-first project is intended to raise awareness about serious youth violence. Three sessions in Merton, targeting around 600 pupils, are planned over the next few months.

Proactive work by the MSCP ensures that children and young people's voices are heard and acted on. Following a survey led by the independent scrutineers across schools, there have been 'stop and search' workshops and a programme of reverse mentoring involving young people and the police to help build children's trust and confidence. Awareness-raising on disproportionality and the adultification of Black



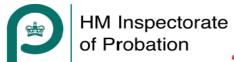






children, led by the MSCP young scrutineer and augmented by the work of eight young inspectors, has informed the work of the children's trust.

Strategic partnership arrangements in Merton are congruent and closely aligned, providing a clear understanding and shared approach to prioritising and meeting children's needs. The 'Safer Merton' CSP manages the serious violence duty effectively and is accountable for how the money from the VRU is being targeted and spent. Governance arrangements across the MSCP and the CSP and the support from the VRU are clear and mostly effective. Current work to strengthen links with the community and voluntary sector through regular site visits provides a better understanding of local projects. This informs the direction of the partnership and provides strategic insight as well as an evaluation of operational delivery. Leaders accept that, by increasing the frequency of multi-agency quality assurance activity, scrutiny and audits, they will enhance the strategic partnership evaluations for individual children and services.





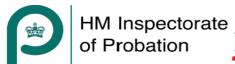




# **Practice study: effective practice**

Partners recognise that risks to children traverse London and national boundaries. A range of cross-borough joint initiatives is making a discernible difference to engaging vulnerable children and improving their life chances. For instance, a police officer-led multi-agency operation established positive relationships with a group of young girls identified as being criminally and sexually exploited across local boroughs. Joint mapping directly involving the children and their parents and the contextual exploitation team and information from MACE meetings assisted in identifying and disrupting adult males. Effective liaison with the southwest London police robbery team linked these perpetrators to multiple robberies with other borough command units. This group of perpetrators was broken up. The child victims have been provided with the requisite help and support and have returned to education.

The east of the borough of Merton has the highest prevalence of serious youth violence and criminal exploitation. Leaders and managers in the YJS are aware that male children, those from diverse backgrounds and children who have experienced abuse and neglect are over-represented as victims of serious youth violence and/or criminal exploitation. A disproportionality task force has been established to explore how to address these issues locally. Working creatively across borough boundaries, leaders have secured funding from the London VRU to set up the 'Gloves Not Gunz' project. The work is being delivered in conjunction with the contextual safeguarding and youth support team. It provides specialist mentoring and outreach, advice and support, educational workshops and group work for parents and children.





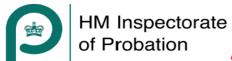




# Practice study: area for improvement

For some children, there is an over-reliance on children and families self-reporting about the level of risk. There is variability in the response of the partnership to children's changing circumstances. In some children's cases, there is a timely and coordinated response. For others, however, there is insufficient regular review of the child's overall plan to ensure that it is addressing dynamic and evolving risks and current circumstances. This is exacerbated for those children who have experienced multiple changes of lead practitioner.

This was particularly evident for one child, where there was too much emphasis placed on the child disclosing risk rather than professionals evaluating all the available information. Inconsistent mechanisms for sharing and analysing information between partners meant that not everyone had the information they needed to fully understand the risks for this child. Risk matrix tools and assessments were not updated or shared frequently enough. Multi-agency panels did not analyse patterns of behaviours, for example numerous arrests, the available police intelligence and criminal allegations. Therefore, the professionals underestimated the level of involvement in crime and risk of serious harm to this child. As a result, key potential victims and risks were not identified. Missed opportunities to intervene earlier meant that this child's offending escalated both in terms of seriousness and frequency and, as a result, the risk of actual violent harm to him and other children increased.







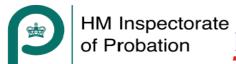


# Places and spaces: highly effective practice

Leaders and managers across agencies share and analyse intelligence to target children most at risk. Local initiatives are informed by the views of children and their families. Young people can share their concerns via postcode surveys and in targeted workshops in schools. Specific area resources are prioritised in response to children's concerns. Funding from the VRU and the local authority for youth workers, as well as the contextual safeguarding team, is used innovatively to enable young people to engage in activities, such as taking young people to the gym for one-to-one sessions or specific projects in areas of high need. Youth workers work closely with the 'Safer Merton' CSP to understand how young people, their families and friends are linked across the borough using mapping exercises. There is access to a wide range of training on serious youth violence and criminal exploitation for youth workers.

Operation Hambling provides effective joint-working between the police, highly skilled detached youth workers, the child exploitation team and local community groups, which is helping to divert children and prevent harm. Initiatives such as fishing sessions, basketball clubs and regular football sessions, which involve some Premier League football players, are a way of keeping young people busy and off the streets. Operation Hambling includes mentors who have real-life experience of serious youth violence and/or criminal exploitation. Practitioners have an acute understanding of children's life experiences and the challenges in families in terms of culture, poverty and the financial draw of criminality. Their work focuses on emotional well-being and identity to build self-esteem. A local youth club valued by parents and children provides a safe space where the young people can go, to engage with staff members through targeted activities. This helps children to feel secure enough to confide in a trusted adult when they are worried or frightened. The youth club is also used to identify emerging risks to individual children and those in the local area.

For instance, an immediate response by the partnership to increased violence in a specific area in Merton culminated in a week of collaborative action. Social care helped to identify the young people at risk, the police provided more active police presence in the locality, and housing associations were happy to patrol the local area, all supported by the detached youth work team. The local businesses and partners reported that communication improved between the stakeholders in the area. The local community centre, which provides a community hub on a local housing estate and offers groups and classes, is very much central to the activity and engagement in the area. This purposeful and persistent joint work engages many highly vulnerable children and reduces risks of further serious harm.





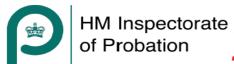




#### **Next steps**

We have determined that the MSCP is the principal authority and should prepare a written statement of proposed action responding to the findings outlined in this letter. This should be a multi-agency response involving the individuals and agencies that this report is addressed to. The response should set out the actions for the partnership and, when appropriate, individual agencies. The local safeguarding partners should oversee implementation of the action plan through their local multi-agency safeguarding arrangements.

The MSCP should send the written statement of action to <a href="mailto:ProtectionOfChildren@ofsted.gov.uk">ProtectionOfChildren@ofsted.gov.uk</a> by 23 May 2024. This statement will inform the lines of enquiry at any future joint or single-agency activity by the inspectorates.









#### Yours sincerely

Letto Bruly.

**Yvette Stanley** 

**National Director Regulation and Social Care, Ofsted** 

Dr Sean O'Kelly BSc MB ChB MSc DCH FRCA **Chief Inspector of Health Care, CQC** 

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**Michelle Skeer OBE QPM** His Majesty's Inspector of Constabulary His Majesty's Inspector of Fire & Rescue Services

**Sue McAllister CB** 

**His Majesty's Chief Inspector of Probation** 

