

## Written Evidence submitted by Operation Encompass<sup>1</sup> (CWSB218)

**1.Introduction:** This submission is informed by the experience and expertise of both founders of Operation Encompass in their professional roles working in education (42 years) and police (30 years). This includes working with and supporting all police forces in England and Wales and beyond, Armed Forces Tri Service police, domestic abuse professionals, domestic abuse victims and survivors and thousands of teachers and education staff who are participating in Operation Encompass.

Operation Encompass, established 15 years ago, is now a global police and education safeguarding partnership, enabling immediate support for children experiencing domestic abuse and other trauma. There are around 2,000 Operation Encompass domestic abuse notifications sent from the police to educational establishments every day in England and Wales alone.

1.1 On 24th May 2024 the Victims and Prisoners Act received Royal Assent. The new Act placed Operation Encompass in statute and places a legal obligation on police forces to share Operation Encompass notifications with educational settings.<sup>2</sup>

1.2 For too many years, following the serious injury or death of a child, we hear the trite term 'lessons must be learned' and as a society we should hang our heads in shame as yet another child death occurs. It is too late for those children whose lives have already been lost or ruined by abuse, but it does not need to be too late for the thousands of our children who wake up every day as victims of a wide range of abuse, children experiencing a wide range of vulnerabilities, children who have a right to not only feel safe but to be safe. The positive impact of Operation Encompass across the UK is unquestionable and is evidenced in a number of impact reports<sup>3</sup> which share feedback from educational settings,<sup>4</sup> police, adult and child victims and other professionals in this field.

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<sup>1</sup> [www.operationencompass.org](http://www.operationencompass.org)

<sup>2</sup> [Guide to Implementing Operation Encompass](#)

<sup>3</sup> [Operation Encompass Impact Report Update May 2024](#) [Operation Encompass Impact Report 2023-24](#) [Operation Encompass Impact Report 2023](#)

<sup>4</sup> [Northumbria University Research All Jumbled Up](#)

1.3 The campaigning work of Operation Encompass ensured that children were recognised as victims of domestic abuse in their own right in the DA 2021 Act.

**2. Summary:** The Children’s Wellbeing and Schools Bill must be used to create a pivotal point to improve the landscape of safeguarding for our children, to transform their living experiences, to give them a better today and a better future.

2.1 This Bill should also be used to further enhance the national, government, education, health and police response to children being recognised as victims of domestic abuse in their own right and to do this Operation Encompass proposes relevant additions and amendments that will better protect child victims.

2.2 Each aspect of this submission has been carefully considered and has been included on the basis of its positive impact in supporting the safeguarding and well-being of the whole child.

### **3. Suggested amendments to the Bill:**

#### **3.1 Children’s Rights**

3.1.1. As a signatory to the UNCRC, the actions within this Bill must be firmly placed in the children’s rights arena. Safeguarding is a children’s rights issue.

We ask that there is a child friendly version of the Bill which allows our children to not only read what has been proposed but to respond to the Bill.

There should be a public call for responses from children of all ages and a clear method by which children of all ages can respond should be created.

#### **3.2 Working Together to Safeguard Children and Keeping Children Safe in Education (KCSIE)**

3.2.1. Operation Encompass is in place in all 43 police forces in England and Wales. Operation Encompass is now a legislative obligation for all police forces in England and Wales (also in legislation in Northern Ireland and Gibraltar).

Placing Operation Encompass in legislation for police forces means that there must be a parallel expectation upon all educational settings to cooperate with the police so that notifications can be shared with them in a safe, secure and timely manner. Whilst Operation Encompass has been in KCSIE for a number of years, there needs to be strengthening of the expectation upon schools with the responsibility upon them to participate fully in Operation Encompass being as robust as it is for the police.

### 3.2.2. Operation Encompass asks that the government:



to place a duty upon all safeguarding partners to fully participate in Operation Encompass and embed these expectations in Working Together to Safeguard Children



to place a duty upon all educational settings to participate fully in Operation Encompass and embed these expectations in Keeping Children Safe in Education

## 3.3 Safeguarding training in schools and for trainee workforce

3.3.1 Our children have a right to attend an educational setting where all staff members (not only teachers) undertake ongoing training in order to ensure that they can appropriately identify need, harm and risk. This training should also help them to recognise the incredibly important role that they play in providing day to day support, nurture and compassion and how this approach can mitigate the harm caused by abuse and ensure that each and every child experiences that feeling of ‘belonging’ championed by The Rt Hon Bridget Phillipson MP, Secretary of State for Education. <sup>5</sup>

3.3.2. This understanding of the importance of having knowledge of a child’s living experience should feed into behaviour policies that are grounded in international trauma informed practice rather than punitive approaches.

3.3.3. Domestic abuse is the most common form of abuse experienced by our children <sup>6</sup>and, as such, it is imperative that all staff understand the nuances and complexities of domestic abuse for both adult and child victims, the harm it causes to our children (including the harm caused

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<sup>5</sup> 7 November 2024 Speech to Confederation of School Trusts

<sup>6</sup>[ONS Child Abuse in England and Wales 2020](#)

during pregnancy) and the need to create positive relationships and environments within educational settings that can support the child and help them to begin the journey of healing.

3.3.4. Domestic Abuse does not exist in a vacuum nor does it exist in otherwise fully functioning families. Information shared through Operation Encompass can alert educational staff to a wide range of other vulnerabilities that may be experienced by the child. It is “the key to the big door”.

3.3.5. The free National Operation Encompass Online Training, created in mid 2020, has over 36,000 registered users, equating to over 5 million pounds of free training for the education sector.<sup>7</sup>

### 3.3.6. Operation Encompass asks that the government:



strengthen mandatory safeguarding training for all staff in educational settings which includes a focus upon domestic abuse, its impact upon the child and the simple ways in which all staff can support children experiencing domestic abuse



create a robust mandatory curriculum of safeguarding training for those training to enter the education workforce which includes the impact of domestic abuse



create a free national mandatory qualification which follows a robust national curriculum for those wishing to undertake the role the safeguarding lead in a setting



ensure that mandatory training for educational staff is free at the point of delivery



investigate the financial burden upon schools of undertaking safeguarding training and identify if the profits of these providers are excessive

## 3.4 Conditional Powers of Entry for Police to Protect Domestic Abuse Victims

3.4.1. When attending incidents of domestic abuse the police currently lack a specific power of entry to protect victims of domestic abuse. Legislation should be introduced that grant

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<sup>7</sup> [Safeguarding Futures One Child at a Time](#)

officers the authority to enter premises where there is reasonable suspicion that child and adult victims of domestic abuse are at risk. This will enable timely intervention and safeguard victims from further harm.

3.4.2. In a response to the Coroner's report 'Prevention of Future Deaths Report 2024' published after the death of Michaela Hall, Devon and Cornwall Police stated, in relation to the 'Power of Entry - s17 Police and Evidence Act 1984 ... "this was a key issue considered at inquest" ... To seek to apply a different threshold to cases where there are associated DA concerns to the threshold provided for in law would require a national conversation"<sup>8</sup>

3.4.3. Operation Encompass suggests that this conversation is well overdue but that this Bill can create a positive response and ensure that the police have the powers that they, and more importantly, the victims, need.

#### **3.4.4. Operation Encompass asks that the government:**



create a specific conditional power of entry into premises to protect the vulnerable victims at incidents of domestic abuse.

### **3.5 Mandatory Recording of All Domestic Abuse Incidents as Crimes**

3.5.1. The current distinction between the recording of 'crime' and the commonly known 'non-crime'<sup>9</sup> domestic incidents prevents both adult and child victims from receiving immediate protection and necessary support.

3.5.2. In a 12-month period in one police force<sup>10</sup> approximately 23,000 domestic abuse incidents were recorded. 16,000 of these DA incidents were recorded as non-crime. In practice this meant that in nearly all these cases the details were 'filed at source' with no further action taken.

#### **3.5.3. Operation Encompass asks that the government:**



mandate that all incidents that fit the current legal definition of Domestic Abuse (DA Act 2021) should be recorded by the police as a crime.

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<sup>8</sup> [Michaela Hall Prevention of Future Deaths Report 2024](#)

<sup>9</sup> [National Crime Recording Standards Nov 2024](#).

<sup>10</sup> Devon and Cornwall Police 2020

### 3.6 Collection of data for children who are victims of domestic abuse

3.6.1 There is no current accurate national data concerning the number of children who are victims of domestic abuse. Without such accurate data we have no knowledge of how 'big' the issue is and therefore we cannot accurately develop suitable national policies and practices nor can we allocate national support and resources appropriately.

3.6.2. Whilst current estimated figures may provide national policy makers with an indication of the size of the need, it is recognised that we cannot yet identify all children who are experiencing or have experienced domestic abuse in their lives.

3.6.3. Ensuring that children experiencing domestic abuse do receive support from their educational setting is key to early intervention which we know is cheaper, quicker and more successful than waiting to give children support. <sup>11</sup>

#### 3.6.4. Operation Encompass asks that the government:



mandate all police forces to collect the number of children related to any adult at domestic abuse incidents

### 3.7 Removal of the 16-year-old age limit in the Domestic Abuse Definition

3.7.1. The murder of 15-year-old Holly Newton, stabbed by her ex- boyfriend, has reinforced our work to achieve a change in the domestic abuse legislation so that victims under the age of 16 years can have their experience correctly classified as domestic abuse.

3.7.2. For Holly's family this would have meant that her murder was recorded correctly as a Domestic Homicide.

3.7.3. For those experiencing domestic abuse in their relationship but who are under the age of 16, it would also mean that their experience was correctly identified and appropriate support offered.

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<sup>11</sup> Dr Nadine Burke-Harris The Deepest Well

### 3.7.4. Operation Encompass asks that the government:



amend the Domestic Abuse definition and remove the 16-year-old age limit.

### 3.8 Police to attend at all domestic abuse incidents where there are children related to adults

3.8.1. The introduction and continued use of scheduled appointments, online reporting and Domestic Abuse Video Response (DAVR) or Rapid Video Response (RVR), related to the police response to Domestic Abuse incidents, whilst possibly having merit in some cases, (including saving police time and money), can create additional risk, especially when there are children related to the adults involved in the incident. It is concerning that some police forces appear to be using these methods rather than conducting physical visits.

3.8.2. This should not become the norm, especially where there are children related to any of the involved adults. It is imperative that children are physically seen, that the home environment is seen and officers are able to accurately assess risk to the child and be able to share the 'child's voice' with other statutory partners in order to safeguard the child.

### 3.8.3. Operation Encompass asks that the government:



mandate police forces to physically attend all incidents of domestic abuse where there are children related to any of the adults involved and these incidents be graded as 'high priority'

## 4. Operation Encompass Response to the Bill

### 4.1 Clause 2: Education in safeguarding arrangements

4.1.1. The safeguarding role undertaken by staff in educational settings cannot be underestimated. There is a wealth of research which recognises how important these settings are in the identification of vulnerable children and the support and nurture which they can provide for these children.

4.1.2. Regrettably the Bill does not suggest that education be the fourth safeguarding partner and we would ask that the "compelling argument"<sup>12</sup> for schools as a fourth safeguarding

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<sup>12</sup> Child Safeguarding Practice Review Panel [Review into the deaths of Star Hobson and Arthur Labinjo Hughes](#)

partner should be further investigated and any identified issues recognised as “not insurmountable”<sup>13</sup>

4.1.3. 69% of respondents to the 2023 government consultation on this matter agreed that education should be a statutory safeguarding partner.<sup>14</sup>

4.1.4. The current suggestion in the Bill does not place educational settings on an equal footing with Police, Health and Social Care and therefore lessens the seriousness or importance of what education brings to the safeguarding agenda.

#### 4.1.5. Operation Encompass asks that the government:



mandates education to be the fourth safeguarding partner

### 4.2 Clause 3: Multi-agency child protection teams

4.2.1. Operation Encompass supports this clause but would ask that the ‘person nominated by the local authority with experience in education’ be a person with current or very recent experience of working in an educational setting as a Safeguarding Lead, remembering that there are many such highly experienced staff in the maintained sector.

#### 4.2.2. Operation Encompass asks that the government:



mandate current or very recent experience as a Safeguarding Lead to fulfil the education role identified by the local authority

### 4.3 Clause 4: Information Sharing and consistent identifier

4.3.1. Operation Encompass has created a blueprint for the sharing of information in a safe, secure and sustainable manner between police forces and the trained ‘Key Adult’ (safeguarding lead) in educational settings in all 43 police forces and in educational settings across the UK.

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<sup>13</sup> ibid

<sup>14</sup> Consultation on Working Together to Safeguard Children [Working together to safeguard children consultation response.pdf](#)



4.3.2. Operation Encompass has proved that education staff understand the need to have an accurate picture of a child's living experience if they are to support them and enable them to be successful in school and to learn.

4.3.3. The Operation Encompass information sharing process has been welcomed and valued by police at all levels and by educational staff <sup>15</sup> alike and has "changed the landscape of safeguarding in our schools"<sup>16</sup> and "changed the culture of safeguarding in policing"<sup>17</sup>

4.3.4. In some police forces Operation Encompass is supporting the sharing of information from the police to educational settings regarding children missing from home or care and in others, information regarding other vulnerabilities or trauma experienced by children.

4.3.5. The increase of incidents of children seriously self-harming or attempting suicide gives cause for great concern. It is known that many children attend school the following morning after such incidents without any school staff member being made aware. Immediate notifications sent from Accident and Emergency Departments to the schools Operation Encompass trained Key Adult would enable schools to provide necessary support and intervention, thereby improving child safety and wellbeing.

#### **4.3.6. Operation Encompass asks that the government:**



strengthen understanding of the need for professionals to share information when it is to safeguard the welfare of a child



mandate the extension of Operation Encompass Notifications to include hospital A&E departments using the Operation Encompass Information Sharing Process to inform, prior to the start of the next school day, the educational setting's trained Operation Encompass Key Adult about incidents of serious self-harm or attempts at suicide.

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<sup>15</sup> [Operation Encompass Impact Report Update May 2024](#) [Operation Encompass Impact Report 2023-24](#) [Operation Encompass Impact Report 2023](#)

<sup>16</sup> Head Teacher and DSL

<sup>17</sup> Sergeant, Central Safeguarding Unit



mandate the extension of Operation Encompass Notifications from police to educational settings to include children missing from home or care and children experiencing other vulnerabilities or trauma.

#### **4.4 Clause 24: Children not in school, local authority consent for withdrawal of certain children from school**

4.4.1. Operation Encompass supports this clause but recognises the risk that a 'relevant child' may face when a parent wishes to remove them from their current school in order to attend a different school, whether in the same or different local authority. Such a decision may be taken by a parent to delay or avoid a Section 47 (Child Protection) enquiry or other Social Care involvement.

4.4.2. Consideration of current arrangements should be given to those children who are already being educated at home but, whilst recognised as being at risk of harm or abuse, have not met the threshold for Child Protection Plans.

4.4.3. Local Authority Officers responsible for Elective Home Educated children should ensure that, where issues related to safeguarding have been raised (such as an Operation Encompass Notification from the police) home visits are conducted in a timely fashion to ensure the safety and well-being of the child/ren.

#### **4.4.4. Operation Encompass asks that the government:**



mandate that children who are known to Social Care (Child in Need or Child Protection Enquiry or Plan) should not be allowed to change school without consent from the local authority



mandate that home visits are conducted for all Elective Home Education children when an Operation Encompass Notification is received



mandate that home visits are conducted for all Elective Home Education children when other issues relating to safeguarding are raised

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9<sup>th</sup> February 2025