

The Isle of Man Constabulary

An inspection of the Isle of Man
Constabulary

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Summary

In 2021, the Isle of Man Department of Home Affairs (DHA) invited us to inspect the Isle of Man Constabulary (IOMC). We examined how well the IOMC deals with [vulnerable people](#), how well it tackles [serious and organised crime \(SOC\)](#), and its governance arrangements.

Our report makes 17 recommendations and highlights 17 areas for improvement. Some of our findings require urgent action.

Context

This report, and our recommendations and areas for improvement, should be considered in context. The IOMC is a small constabulary that operates in a very different environment to most other police forces. The Isle of Man is a low-crime jurisdiction, with a small resident population which overwhelmingly feels safe in their neighbourhoods and homes.

When reporting our findings we have, where appropriate, drawn on the [College of Policing](#)'s guidance to police forces (called [authorised professional practice \(APP\)](#)). We also refer to findings from other inspection reports.

The constabulary's size and the operational context mean it is unable to meet all the requirements of APP. We have taken account of the way the IOMC operates when conducting this inspection. But there are some elements of the APP that we feel all police forces should aspire to, whatever their resource limitations and operational contexts.

We have written our inspection report in order to help the constabulary improve its service to the public. So, we have to focus on those areas where the constabulary can improve.

Vulnerability

The IOMC has some understanding of the nature and scale of vulnerability in the Isle of Man. But it could improve this by increasing the number of analysts it has. However, if other agencies don't improve how they gather and share data, the constabulary will always struggle to develop a comprehensive understanding of vulnerability.

The IOMC has identified a link between SOC and the criminal exploitation of young and vulnerable people in the Isle of Man. It introduced an impressive multi-agency operation to address the threat this poses. We consider this good practice.

The emergency services joint control room (ESJCR) and the IOMC need to improve how they handle calls involving vulnerable people.

The ESJCR is a multi-agency control room managed by the DHA's communication division, not by the constabulary. Control room operators answer all emergency calls. They have a vital role in identifying whether victims, and others involved in police-related incidents, are vulnerable.

But we found that they don't do this routinely. We listened to calls where operators hadn't accurately recorded what the caller told them and didn't record victims' vulnerabilities. We also found that operators didn't always identify repeat victims or callers and no one regularly dip-samples or quality assures calls.

There isn't always a person with operational policing experience in the ESJCR. An IOMC force incident manager (FIM) is meant to work alongside the ESJCR operators and a supervisor. However, we found that on too many occasions there isn't a FIM in the ESJCR.

We also found problems with the constabulary's processes for answering non-emergency calls. These don't go to the ESJCR. Instead, officers across the constabulary can answer them. The current system creates risks and should be replaced by a single non-emergency phone number routed to the ESJCR.

The constabulary needs to improve the training, guidance and supervision it gives patrol officers, to ensure they identify vulnerable people at first response. The ESJCR should also improve the quality of information that operators give patrol officers while they are en route to incidents.

Officers have to complete a [domestic abuse, stalking and harassment \(DASH\) risk assessment](#) form for all domestic abuse incidents they attend. This helps them identify the level of risk victims face and helps the constabulary safeguard victims appropriately. But we found that the constabulary's DASH process had room for improvement. The IOMC should make sure that officers complete DASH forms in full at the scene and record their rationale.

The constabulary's initial [safeguarding](#) actions are generally effective, with appropriate victim care evident in all the cases we reviewed. Attending officers took [positive action](#) in the domestic abuse cases we reviewed and made arrests where appropriate. But the constabulary should make sure sergeants oversee all medium and [high-risk domestic abuse](#) incidents and direct safeguarding activities where appropriate. Officers should also refer victims to third-sector organisations where appropriate.

Officers responding to incidents involving vulnerable people usually conduct initial enquires effectively, and officers generally conduct secondary investigations appropriately. But the constabulary should make sure that officers produce structured investigation plans in all investigations, and that sergeants regularly review plans and effectively supervise and review investigations.

The IOMC has lobbied for the creation of a formal Isle of Man [multi-agency safeguarding hub \(MASH\)](#) for many years. We were pleased to find, at the time of our fieldwork, that the IOMC and other agencies had started working together to create a MASH.

IOMC officers spend lots of their time responding to mental health-related incidents. To improve the effectiveness and efficiency of the IOMC's response to mental health-related incidents, in 2017 the constabulary and the Department of Health and Social Care piloted a similar scheme. Under the scheme, mental health nurses worked from IOMC's custody suite. IOMC officers felt that the pilot scheme had proved effective in reducing police use of coercive powers and in getting help to vulnerable people quickly. But the pilot scheme was stopped. Senior managers from the DHA and the IOMC should discuss performance and monitor whether the pilot scheme arrangements or something similar should be reintroduced.

The IOMC's neighbourhood officers give good support to vulnerable people in their communities, in partnership with local public sector organisations. This includes structured programmes of school engagement, working with local authority housing departments to help resolve neighbour disputes, and actively engaging in the wellbeing partnerships created by Manx Care in the out-of-town regions in late 2021.

The IOMC conducts effective [missing persons](#) investigations. Appropriate officers conduct the investigations, and in 2021 all missing people were found within 24 hours. But the IOMC should update its missing persons risk assessment form to include a section on the risk of criminal exploitation.

Serious and organised crime

The IOMC has focused more on tackling SOC in recent years. While it doesn't yet have all the same processes in place as police forces in England and Wales, we are pleased that the constabulary is making progress and is improving the way it tackles SOC.

We were also pleased to find that the IOMC has started to [map organised crime groups](#). By doing this, the constabulary is developing a more detailed picture of serious and organised criminality.

The IOMC's strategic tasking and co-ordinating group works well. It oversees the constabulary's response to SOC at a strategic level, in accordance with the threats identified in its strategic threat and risk assessment. But it doesn't have a structured and independent means of assessing the extent to which its activity disrupts SOC.

The constabulary doesn't follow a [4Ps](#) approach (prevent, pursue, protect and prepare). While it undertakes some activity aimed at preventing SOC, it mainly tries to address SOC by pursuing criminals and arresting and charging them. The constabulary would be more efficient and effective at tackling SOC and keeping people safe if it adopts the 4Ps approach to tackling SOC in partnership with other agencies.

Most detectives are young in service and haven't completed the College of Policing's [initial crime investigators development programme](#), while some supervisors haven't had appropriate leadership training. To better meet the challenges of SOC, the constabulary needs to address these training needs.

The IOMC lacks the tools that police forces in England and Wales use to monitor convicted [organised crime group \(OCG\)](#) members and prevent them from re-offending. The [Serious Crime Act 2007](#) introduced serious crime prevention orders and other civil orders in England and Wales. These orders can impose far-reaching restrictions on serious offenders to help manage the risk of them re-offending. The DHA should consider whether introducing similar tools would help prevent SOC in the Isle of Man.

Governance

The [Police Act 1993](#) sets the statutory basis for policing and police governance in the Isle of Man. It clearly sets out the responsibilities, powers, functions and roles of key organisations responsible for managing and providing policing governance. It also gives a robust framework within which they work. In 2021, the DHA and the IOMC signed a joint protocol. This further defines the working relationship between the two organisations. It gives clarity on their respective roles and responsibilities. This framework works well. But amending the protocol to explicitly outline the operational independence of the IOMC would be beneficial.

The DHA sets the IOMC's priorities after consulting with the constabulary. But the public is unable to influence policing priorities.

The DHA and Tynwald (Manx parliament) scrutinise and oversee the IOMC's performance. But there isn't a formal regular reporting mechanism that allows the DHA to scrutinise the constabulary's use of many of its operational powers, such as stop and search, use of force and police [bail](#).

There also aren't enough processes to allow structured public scrutiny of the constabulary's performance. Aside from the chief constable's annual report, there aren't any other formal processes for the constabulary to publicly report its performance. The DHA should start conducting its police performance meetings in public and consider re-establishing a police advisory group.

The Isle of Man's regulatory framework for police conduct and performance is similar to that in England and Wales. But some aspects need to be revised:

- The Isle of Man Police Complaints Commissioner (PCC) supervises complaints against IOMC police officers under the rank of chief constable. But they lack powers to manage and investigate complaints when necessary.
- The IOMC can't self-refer a case to the PCC. By contrast, in England and Wales there are established voluntary referral processes.
- The regulations are unclear about what should happen if the chief constable considers that a complaint is informal (as described under the Police Act 1993) but the complainant doesn't accept the constabulary's informal resolution.
- The PCC lacks powers to issue statutory guidance to the IOMC about investigating complaints.

Introduction

About His Majesty's Inspectorate of Constabulary and Fire & Rescue Services

His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) independently assesses the effectiveness and efficiency of police forces and fire and rescue services, in the public interest. We conduct statutory inspections of police forces and other law enforcement agencies in England and Wales. We also inspect police forces in British Overseas Territories and Crown Dependencies on invitation from the relevant authority.

In preparing our reports, we ask the questions that citizens would ask and publish the answers in an accessible form, using our expertise to interpret the evidence and make recommendations for improvement.

Terms of reference

Our commission was to inspect:

- how well the Isle of Man Constabulary (IOMC) deals with [vulnerable people](#);
- how well the IOMC tackles [serious and organised crime \(SOC\)](#); and
- the governance arrangements for the IOMC.

We are grateful to those who gave their time freely and willingly to help us during our inspection of the IOMC.

Our methodology and approach to this inspection

Our fieldwork for this inspection took place in November and December 2021. As a result of the pandemic, we conducted much of the fieldwork remotely. But we were able to visit the Isle of Man for one week. During our fieldwork, we:

- conducted more than 30 interviews and focus groups of police personnel at all levels of the constabulary;
- interviewed Isle of Man government officials;
- attended constabulary governance and performance meetings; and
- reviewed several investigations into crimes involving vulnerable victims.

We also reviewed more than 300 documents given to us by the constabulary.

We have, where appropriate, drawn on the [College of Policing's](#) guidance to police forces. This is known as [authorised professional practice \(APP\)](#). We also refer to findings from other inspection reports.

The IOMC's policing context is different to that of police forces in England and Wales. The Isle of Man is a low-crime jurisdiction, with a resident population of just 80,000. The population perceive that the island is safe, with more than 90 percent of respondents to the [Isle of Man Social Attitudes Survey 2019](#) saying they feel 'fairly safe' or 'very safe' at home and in their neighbourhoods.

The IOMC operates on a fixed, annual revenue budget. The chief constable can make bids for growth or for funding for new areas, but the ability to do this is severely limited. Restrictions on the bid process tie all such cases to the government's five-year plan, which in turn makes little mention of policing or to new legislation. However, the greatest limitation is the availability of funding. In 2021, the government made clear that its finances were such that no funding would be available for 2022/23 and for the foreseeable future. The challenge for the IOMC is to maintain its current revenue budget in the face of austerity and inflation.

The IOMC is also far smaller than any police force in England and Wales. The constabulary's size and the operational context mean it is unable to meet all the requirements of the APP. It has a process to assess which parts of the APP aren't applicable and derogates from the APP in line with this. However, it hasn't officially derogated from the APP relating to the areas covered in this inspection. But there are some elements of the APP that we feel all police forces should aspire to, whatever their resource limitations and operational contexts.

Vulnerability

Identifying vulnerable people

We found that the IOMC doesn't identify [vulnerable people](#) consistently. It also doesn't have a single definition of vulnerability.

Our police effectiveness, efficiency and legitimacy (PEEL) inspections of policing in England and Wales have found that all forces have corporate definitions of vulnerability, although the definitions do differ from force to force. We consider this good practice. Most police forces use either the [definition given by the College of Policing](#), the definition in the UK Government's [Code of Practice for Victims of Crime](#), or a combination of the two. Each police force's definition underpins its policy, procedure and practice.

Section 5 of the Safeguarding Act 2018 gives the Isle of Man's statutory definition of a vulnerable adult. As a statutory body with a duty for [safeguarding](#), this is the definition the IOMC must follow. It is a narrow definition of vulnerability. For example, it doesn't include children or people otherwise vulnerable due to their age or health. During our inspection, we found several IOMC policies referring to vulnerable people. Each policy defines aspects of vulnerability.

IOMC managers highlighted this point during the inspection. As vulnerability manifests in diverse ways, they don't have a single definition that they can use consistently. Our concern is that some frontline officers we interviewed couldn't tell us what constitutes vulnerability. If they don't know this, they may not always identify vulnerable people.

A single definition of vulnerability, supported by effective and relevant training and policies, would give officers a clear understanding of the range of ways in which people may be vulnerable. And it could help make sure that vulnerable people receive the support they need. While the constabulary didn't have a single definition of vulnerability at the time of the inspection, it had drafted a vulnerability guidance booklet that incorporates one.

Understanding the nature and scale of vulnerability

The IOMC has some understanding of the nature and scale of vulnerability in the Isle of Man. But it could do more to increase this. It finds it difficult to get all the information it needs from other organisations to fully understand the prevalence of several types of vulnerability in its communities. It receives a range of data on domestic abuse from Women's Refuge Isle of Man. But most other agencies don't gather vulnerability and safeguarding data in a useable format, so the IOMC doesn't receive data on all the offence types that may involve vulnerability.

In 2021, the IOMC adopted the [management of risk in law enforcement \(MoRiLE\)](#) scoring methodology supported by the Professional Head of Intelligence Assessment 'probability yardstick' used in many other UK law enforcement strategic threat and risk assessments. While this is still being fully implemented, MoRiLE has helped the constabulary to prioritise cases of greatest risk and to respond appropriately to reduce that risk.

But the IOMC's analytical team lacks the resources to regularly produce documents aimed at tackling vulnerability. Most of the IOMC's analysts are usually responsible for supporting investigations and generally don't have time to develop strategic analyses of vulnerability issues. With the current resourcing levels, the team also lacks resilience when any of the analysts are on leave or abstracted from their core roles.

Area for improvement 1

The chief constable of the Isle of Man Constabulary should increase the constabulary's analytical capacity and capability.

Understanding the link between serious and organised crime and vulnerable persons

There is a link between the growing threat from SOC (especially drug importation) and the criminal exploitation of young and vulnerable people. The IOMC and its partner agencies are increasingly finding that vulnerable people are involved in distributing drugs packages from the UK and in laundering money made from drug trafficking.

The constabulary has prioritised tackling the exploitation of young and vulnerable people.

The constabulary is working with schools and other agencies to identify and safeguard people who criminals are exploiting or who are at risk of becoming exploited. Specialist neighbourhood police officers warn children about exploitation, gather information and develop [intelligence](#) about those most at risk.

The IOMC is also using police data and information from some other agencies to inform an operation (Operation Yarrow) to divert the most vulnerable juveniles from criminality, victimisation and exploitation. Analysts use the data to assign a risk score to each person. This then informs the constabulary's tasking process, public protection arrangements and overall understanding of demand and threat.

The IOMC, Manx Care, the Department of Education, Sport and Culture and the Department of Health and Social Care attend a multi-agency exploitation meeting every six weeks, where they discuss plans for the highest-risk juveniles. The agencies contribute with co-ordinated actions where possible and with intelligence where appropriate.

Police officers from a specialist team provide diversion opportunities for those juveniles prioritised as being most at risk of becoming involved in organised crime. Senior leaders in education are devising mentoring schemes, football tournaments and drama activities to illustrate exploitation threats. The constabulary's safeguarding officer visits those who are at highest risk each month to check their progress.

We consider this operation to be good practice. The constabulary is also developing a similar operation to divert adults from criminality.

Managing information

The IOMC hasn't made sure that all the intelligence in the documents it holds is available on its intelligence system. The constabulary recognises this problem and is working to address it.

First contact

The emergency services joint control room (ESJCR) and the IOMC need to improve how they handle calls involving vulnerable people. This section covers how the constabulary handles both emergency and non-emergency calls.

The emergency services joint control room

The ESJCR receives all police, fire and ambulance 999 emergency calls. Established in 2004, the ESJCR isn't part of the IOMC. Instead, it is the responsibility of the Department of Home Affairs (DHA)'s communication division. This means the IOMC has limited influence on how the ESJCR operates.

Emergency services joint control room staffing

The ESJCR operates 24 hours a day, 7 days a week, with its 25 staff working a five-shift system. When fully staffed, each shift includes four operators and a supervisor. But because of leave, sickness and other absences, it often runs at its minimum staffing level of a supervisor and two operators.

The service level agreement between the DHA and the IOMC requires the constabulary to provide a force incident manager (FIM) to work in the ESJCR. FIMs are responsible for planning, managing and monitoring operational policing activities. They are also responsible for effectively and efficiently directing the deployment of resources to incidents, including [critical incidents](#).

Operators answer 999 calls and dispatch emergency service resources. This is instead of being either dedicated call handlers or dedicated dispatchers, as is the case in many other control rooms. While this isn't the best model for larger police forces' control rooms, for the ESJCR it is appropriate as it gives the control room flexibility to meet demand. It also encourages operators and supervisors to work together to deal with emergency calls.

Training for emergency services joint control room staff

Before they start work in the ESJCR, operators complete a three-month initial training programme. This includes two weeks of training from the IOMC about how to handle police calls.

But further training would be beneficial. Operators told us they weren't trained on what advice they should to give callers to:

- safeguard victims;
- prevent repeat victimisation; or
- preserve forensic evidence.

In 2021, an internal IOMC memo corroborated this and concluded: "It appears that, at present, the learning for all parties is vicarious." Relying on on-the-job training and learning from colleagues can spread poor practice. It is no substitute for robust, structured training.

Operators also haven't received specific training on how to avoid re-traumatising victims. In inspections of police forces in England and Wales, we have found that when untrained, inexperienced people talk to victims of domestic abuse and sexual offences first, it can lead to re-traumatisation.

Area for improvement 2

The manager of the emergency services joint control room should make sure that control room operators receive enough training for police calls. This should include training on how to give crime prevention advice to victims and how to prevent re-traumatisation.

Guidance for emergency services joint control room staff

ESJCR operators aren't always effective when taking police calls related to incidents involving vulnerable people. This is because the constabulary doesn't have a definition of vulnerability, and operators don't receive enough training or have enough guidance or direction on what to ask victims.

The ESJCR has access to a call-handling system. When operators start entering details on the system about fire and ambulance calls, the system generates a pre-set list of questions for operators to ask. Most police [force control rooms](#) use a system like this. The questions help operators gather information about the incident and victims' vulnerabilities. It also prompts them to give callers advice about crime prevention and safeguarding.

The IOMC decided that the call-handling system's questions for police calls – designed for law enforcement in the USA – aren't suitable for the Isle of Man. So, the ESJCR doesn't use them.

This problem isn't unique to the IOMC. [In 2018, we reported that the Bailiwick of Guernsey Law Enforcement](#), which uses the same call-handling system, felt that some of its questions weren't suitable for that jurisdiction either. We recently asked the Guernsey Joint Emergency Services Control Centre (JESCC) for an update on its use of the system. It still uses it for police calls. The JESCC managers told us that recent updates to the call-handling system have made it more suitable for their needs.

The ESJCR should explore whether the recent updates to the system can better meet its needs.

Recommendation 1

By April 2023, the manager of the emergency services joint control room should identify and implement improvements in the call-handling system's question sets for police calls, to better meet the needs of vulnerable victims.

In the absence of the system's question sets, we found evidence that:

- The IOMC has given the ESJCR standard operating procedures for some types of incidents. But these procedures don't include enough guidance on what information operators should get from the caller and most don't include any guidance on the advice that operators should give, although the sexual offences procedures do give forensic preservation advice.
- Some ESJCR operators are using old versions of the standard operating procedures.
- Many of the longer-serving ESJCR operators rarely follow the procedures. Interviewees told us that, in some cases, operators "are winging it".

Quality of call handling

As part of our crime file review, we:

- listened to recordings of calls to the ESJCR involving vulnerable victims; and
- read the entries the operators made on their computer-aided dispatch system.

The quality of call handling is inconsistent. ESJCR staff don't always try to identify victims' vulnerabilities. For example:

- In a domestic violence incident, the victim told the operator that the suspect was still on the scene and trying to damage his breathing apparatus. But the operator asked the caller irrelevant questions such as: "Is the house in your name?" The disclosure about breathing apparatus didn't prompt the operator to ask further questions about the victim's vulnerability.
- There were four calls reporting rape incidents. The operator didn't explore whether any of the victims were vulnerable, even when the caller told them that the victim had mental ill health.
- Operators aren't always giving crime prevention or safety advice to make sure callers are safe. In some cases, they are ending calls before the police arrive.
- Often operators only enter scant details onto the computer-aided dispatch system and don't use event logs of the type used in many other police control rooms.

And in some cases, we found that operators aren't accurately recording what the caller tells them:

- In a missing persons incident, a relative of the missing person told the operator that criminals had threatened the person. They described him as "in fear of his life" and said he "would be classed as vulnerable because of his mental health issues". But the operator recorded on the system that the missing person "has no medical concerns or vulnerabilities".
- In a rape incident, the operator logged on the system that the victim "wants to speak to a female officer". The caller hadn't made such a request. The operator appears to have made an assumption based on stereotyping, assuming the suspect(s) were male and that the victim wanted to speak to a woman. Such assumptions may contribute to victim trauma, for example, if the offence involved a female offender. They may also delay the police response, as the constabulary must wait until it can dispatch a female officer.

Identifying repeat victims

Operators aren't always identifying repeat victims or callers.

Unlike control room software used in some police forces in England and Wales, the ESJCR's computer-aided dispatch system doesn't highlight whether a call is from a repeat caller. Operators can search the system to see whether the caller, victim or address is linked to any other reported incidents. But interviewees told us that when

the ESJCR is down to its minimum staffing levels, operators don't always have time to do this.

The domestic abuse standard operating procedure prompts operators to ask if the victim has previously been subject to abuse. But operators didn't do this in any of the domestic abuse calls we reviewed.

Structured assessment of threat, harm, risk and vulnerability, and prioritisation of dispatch

The ESJCR's working practice guidance states that FIMs should conduct a structured assessment to assess the levels of threat, harm, risk and vulnerability faced by the victim (known as a [THRIVE](#) assessment). This then informs the grade of the policing response to a call. But some of the officers who carry out the FIM role haven't received THRIVE training and weren't confident to conduct the assessment.

We also found that on too many occasions there isn't a FIM in the control room. This is a problem that the constabulary needs to address. At such times, the ESJCR supervisor is meant to conduct any THRIVE assessments needed. Unlike the FIMs, all ESJCR supervisors have received training on how to carry out a THRIVE assessment. But we found few THRIVE assessments recorded on the computer-aided dispatch system.

We also found no evidence of any oversight or audit of how well people were conducting and recording THRIVE assessments.

Area for improvement 3

The chief constable of the Isle of Man Constabulary should introduce oversight and governance procedures to make sure that the emergency services joint control room:

- conducts thorough THRIVE assessments for all calls; and
- records these on the computer-aided dispatch system.

FIMs are the only people working in the ESJCR to have current operational policing experience, which allows them to give oversight and advice to other ESJCR staff. As one interviewee said, due to a lack of operator training and because the question sets aren't used, "the ESJCR is reliant on FIMs". We found this was a widely-held view in the IOMC.

Recommendation 2

With immediate effect, the chief constable of the Isle of Man Constabulary should make sure that the emergency services joint control room (ESJCR) always has a force incident manager (FIM) present. Once the chief constable is confident that ESJCR operators are evaluating and recording vulnerability accurately, the force could reconsider whether a FIM is still needed at times of very low demand.

Quality assurance of calls

There is no regular dip-sampling or quality assurance of calls.

The service level agreement between the DHA and the IOMC doesn't include any requirement for the ESJCR manager to check the quality of police-related calls. This is different for fire and ambulance calls. For these, the manager quality assures calls and computer-aided dispatch system entries against the call-handling system scripts.

Neither the ESJCR supervisors nor the FIMs dip-sample calls or computer-aided dispatch system entries. The constabulary told us that it dip-sampled some calls in preparation for our inspection, but this doesn't happen routinely.

ESJCR management holds regular performance meetings with the IOMC. This could be a forum for problems to be highlighted and discussed, and for solutions to be found. But the meetings don't perform this role. If the IOMC or the ESJCR regularly audited calls and computer-aided dispatch system entries, then this would provide the meetings with the data it needs to improve the quality of service that 999 callers receive.

Recommendation 3

By April 2023, the chief constable of the Isle of Man Constabulary and the Department of Home Affairs should develop robust governance and oversight arrangements for the emergency services joint control room that include regular quality assurance of calls and computer-aided dispatch system entries.

First response: non-emergency calls

As well as calling 999, people can also report incidents to the IOMC via a non-emergency call to the constabulary. Although the constabulary can't measure how many non-emergency calls it receives, between January 2020 and December 2021, 38 percent of investigations resulted from such calls. By comparison, only 30 percent of the IOMC's investigations started with a 999 call.

In 2011, police services across the UK began introducing [101](#) as their sole non-emergency phone number. Aside from 999, 101 is now the only contact

number given on UK police forces' websites and literature. Staff at local police force control rooms answer calls to 101. The control rooms' systems record these calls. The Bailiwick of Guernsey Police uses a similar system, with calls to its 222222 non-emergency number going through to the JESCC.

By contrast, the IOMC hasn't set up a single non-emergency telephone number. Instead, the '[contact us](#)' page of the constabulary's website lists 21 telephone numbers. These include a general enquiries line (referred to as a non-urgent police phone line [elsewhere on the website](#)), as well as specific phone numbers for the four police stations.

Callers to the non-emergency phone numbers may want to report crimes, may be victims themselves, and/or may have vulnerabilities that the constabulary needs to be aware of. It is also possible that some people might phone their local police station or the constabulary's main number in emergencies, despite the website clearly saying that all emergency calls should go to 999. As a result, the current system creates risks for victims and the constabulary.

We found several problems:

- The telephone system doesn't record calls apart from 999 calls and those transferred to the ESJCR.
- Staff answering calls to the general enquiry line and to the police stations haven't all received training on how to identify vulnerability, conduct THRIVE or give safeguarding advice.
- Operators answering calls to the general enquiry line don't have access to the constabulary's crime and intelligence systems to check whether callers are repeat victims. They also don't have access to the constabulary's command and control IT system.
- Some of these operators take notes of the calls, which they shred at the end of the shift. This practice could undermine any later criminal investigations, as witnesses of first complaint are required to keep records.
- As calls aren't recorded, the IOMC can't audit the effectiveness of call handling for these calls.

The procedures and systems that the IOMC uses to receive non-emergency calls need to improve. It should consider introducing a single non-emergency phone number that connects directly to the ESJCR.

Recommendation 4

By October 2023, the Department of Home Affairs should consider introducing a single non-emergency phone number routed to the emergency services joint control room.

Initial response to vulnerable victims

Experience, knowledge, and supervision of attending officers

The first responders (or attending officers) to most incidents are uniformed constables who are based in Douglas and at the out-of-town police stations (Castletown, Peel and Ramsey).

At the time of our inspection, 38 percent of these uniformed constables were student officers, with limited policing experience. More than half of the constables in three of the constabulary's eight response units were student officers. In one team, 71 percent of the constables were students.

While it is important that all police officers receive appropriate guidance, refresher training and supervision, this is clearly even more important in a police force where many officers lack policing experience.

Written policies and procedures form the foundation for most police forces' activities. When properly developed, they guide officers in doing their duties. They also give officers the information they need to act decisively and consistently, which in turn increases their confidence in carrying out their roles.

The IOMC hasn't produced the range of written policies and procedures that we would expect, including about vulnerability. This leaves officers without enough guidance on how to perform their duties. There is guidance (called business rules) for some policy areas, including domestic abuse. But this isn't comprehensive and doesn't give a clear step-by-step guide for officers.

Response officers also haven't been issued with aide-mémoires, checklists or how-to guides to refer to or complete when attending incidents. Such guidance is commonplace in most other police forces.

The IOMC has drafted a detailed vulnerability booklet to increase the guidance available to officers. While this includes useful information and instruction, the constabulary should also create clear step-by-step procedures for core activities. It should review and update its current business rules and develop aide-mémoires.

The constabulary gives probationary officers wide-ranging training on vulnerability and safeguarding. Following their probation, officers receive some training updates and [continuing professional development](#). For example, officers from the constabulary's multi-agency [public protection unit](#) have given all uniformed officers safeguarding training. But managers conceded that the constabulary needs to improve refresher training and continuing professional development, especially for officers who aren't in specialist roles.

We also found varying levels of supervision for response officers across the constabulary. This is a particular problem for officers based at the out-of-town stations. At each out-of-town station, there are five shifts of constables but only one sergeant. So, most of the time, there are no local sergeants to supervise the constables' work. When the local sergeant isn't on duty, one of the two other out-of-town sergeants supervises the constables. When none of the out-of-town sergeants are on duty, a sergeant in Douglas performs this role.

The uniformed officers' inexperience, coupled with the problems with guidance, training and supervision, means there is a risk that they won't fulfil their duties effectively or thoroughly.

Recommendation 5

By October 2023, the chief constable of the Isle of Man Constabulary should increase first responders' capabilities to respond to incidents involving vulnerable victims. This should include:

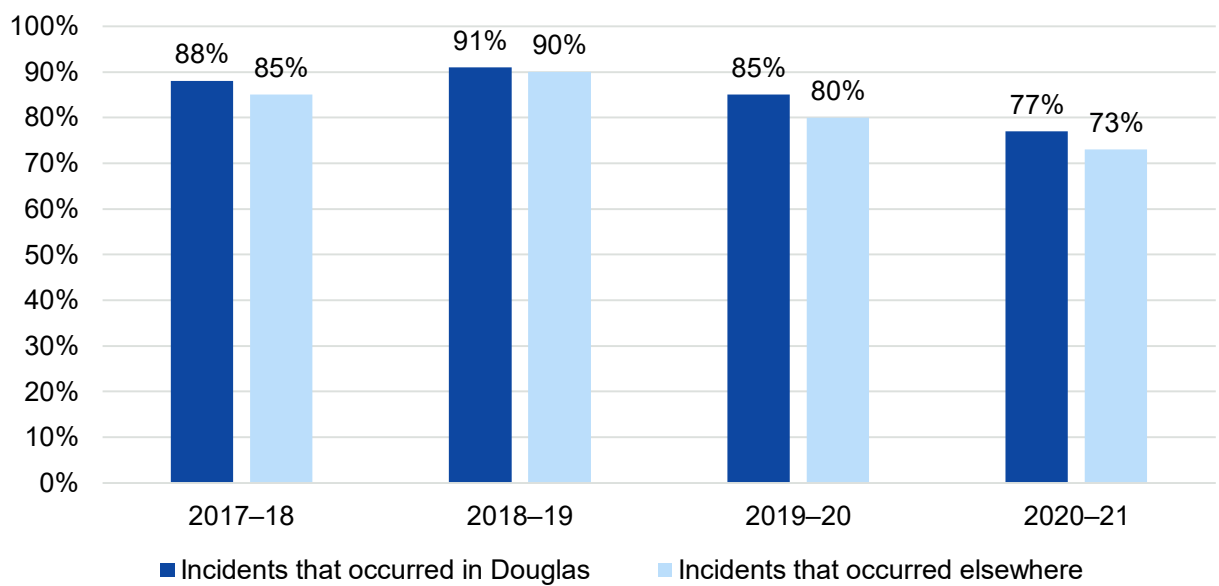
- providing officers with regular refresher training;
- developing clear policies and procedures, and providing officers with clear step-by-step guidance; and
- improving supervision of first responders' actions across the constabulary.

Timeliness

Officers arrive quickly at the scene of most priority incidents (which are incidents graded by the ESJCR as requiring immediate response), including all such incidents that we examined as part of our crime file review.

The constabulary's standard operating procedures state that officers should arrive at priority incidents within 10 minutes if they occur in Douglas and within 15 minutes if they occur elsewhere. The following chart, based on data gathered by the IOMC, shows the constabulary's performance against these targets:

Proportion of priority incidents attended by IOMC within target times



Source: IOMC Analysis Centre, iNET Response Times (October 2021)

We recognise that there were often staff abstractions during the pandemic, which could have led to the dip in performance from 2019 to 2021. But the constabulary may still wish to consider auditing those incidents where attendance wasn't within the target times to find out what other factors contributed and try to mitigate them.

Information given to officers attending an incident

Attending officers should receive the information they need prior to arriving at the scene of an incident. This should include:

- details of earlier events that may be relevant to the current incident;
- any information that the constabulary may have on whether the victim or suspect has any vulnerabilities; and
- any issues that could pose a risk to the safety of the officers.

This isn't routinely happening. Attending officers in one focus group told us: "The ESJCR is very good at providing patrol officers with information while [they are] on route to the incident." But this wasn't the view of other uniformed constables and sergeants we interviewed, who described the service provided by ESJCR as "very hit and miss."

Area for improvement 4

The manager of the emergency services joint control room should improve the quality of information that operators give attending officers.

Assessing vulnerability in domestic abuse incidents

The procedures for completing risk assessments

Officers have to complete the IOMC's [domestic abuse, stalking and harassment \(DASH\) risk assessment](#) form for all domestic abuse incidents they attend. This is based on the DASH form that UK police forces use to help frontline officers identify high-risk cases of domestic abuse, stalking, harassment and so-called honour-based violence. But there are significant differences.

In most police forces, officers attending the scene of a domestic abuse incident must complete a printed or electronic DASH form in full at the scene. But this isn't the case in the Isle of Man. The constabulary has produced a paper risk assessment form, but officers don't have to fill it in when attending domestic abuse incidents. Instead, the IOMC domestic abuse business rules describe the form as an aide-mémoire for officers attending domestic incidents, who can refer to it when they later fill in an electronic DASH risk assessment at the station.

The constabulary should amend its business rules to require officers to complete a thorough initial risk assessment at the scene and record it on a DASH form. But first, it should redesign the paper form.

The current paper form is simply a list of 24 questions for which officers can tick 'yes', 'no' or 'don't know'. Unlike the forms used by some other police forces, there is no space for officers to give further details, context or otherwise expand on their answers.

When entering details onto the DASH risk assessment on CONNECT (the constabulary IT system), officers have to enter an explanation for any questions they answered 'yes' to. Officers told us it would be better if the paper form reflected this, as some young-in-service officers forget to collect this information at the time. We agree with their statement. While it is inefficient for officers to complete a paper DASH form and then transcribe this onto CONNECT, this is more effective than relying on officers' memories.

Most UK police forces' DASH forms include guidance on how officers should complete them. Many police forces also issue first-responding officers with checklists of other actions they should take when attending a domestic abuse incident. The IOMC's domestic abuse business rules include some guidance, but it is neither comprehensive nor available to officers when they attend a domestic abuse incident. Providing attending officers with better guidance and checklists they can use for domestic abuse and other incidents could prove useful, especially given the lack of experience of many of the IOMC's uniformed officers.

When an officer completes the DASH form on CONNECT, the system automatically assigns a risk level to the incident based on the number of 'yeses' that the officer has ticked. This isn't ideal. As the [College of Policing's APP](#) states: "Forces should avoid grading the level of risk solely on the number of 'yes' responses." Rather than

simply counting the number of ‘yes’ responses, first responders should apply an element of professional judgment to make an effective risk assessment.

Officers told us that they can override the automatically-generated assessment. And the domestic abuse business rules imply that officers should base their risk assessments on their professional judgment, saying:

“Risk levels should be determined by the [officer] and either endorsed or rejected by Supervision. The rationale for all decisions surrounding the risk assessment should be documented in full.”

But none of the DASH assessments we reviewed included the requisite rationale or any evidence that the officer completing the assessment had actively considered whether the automatically-generated risk level was appropriate. This is an area for improvement.

Area for improvement 5

The chief constable of the Isle of Man Constabulary should make sure that officers completing domestic abuse, stalking, and harassment (DASH) forms record their rationale. The constabulary should also revise its business rules to instruct officers attending the scene of a domestic abuse incident to complete DASH forms in full at the scene.

Oversight

The constabulary has procedures designed to make sure that officers conduct thorough DASH assessments for all reported domestic abuse incidents. After an officer has completed their DASH assessment on CONNECT, their supervisor has to quality assure it before going off duty. The assessment is then automatically sent to the domestic abuse officer in the constabulary’s multi-agency public protection unit for a second quality assurance. Interviewees also told us that the constabulary’s daily management meeting is used to check whether officers have completed DASH forms for all domestic abuse incidents.

But this process doesn’t seem to be effective. Attending officers had only completed DASH forms in three of the five domestic abuse cases we reviewed.

Area for improvement 6

The chief constable of the Isle of Man Constabulary should make sure that attending officers complete domestic abuse, stalking, and harassment forms for all domestic abuse incidents they attend.

Assessing vulnerability in other incidents

Despite the processes in place for assessing risk in domestic abuse cases, we found no evidence that IOMC officers have to routinely assess the vulnerability of all the victims, witnesses and suspects they encounter. As a result, there's a risk that IOMC officers don't always identify vulnerable people, meaning vulnerable people may not all receive the proper response, whether it be referral for multi-agency intervention or other safeguarding measures.

Many police forces in England and Wales have developed processes to make sure that officers assess such vulnerabilities at an early stage. This maximises any early intervention opportunities and may help prevent victimisation. For example, the Metropolitan Police Service expects its personnel to conduct a vulnerability assessment framework assessment when responding to all incidents. The framework requires officers to measure vulnerability across five areas: appearance, behaviour, communication/capacity, danger and environmental circumstances. It outlines actions that officers should take if the score meets a certain threshold.

Introducing a risk assessment like the vulnerability assessment framework would help the constabulary identify those people who it should refer to other agencies. It would also highlight any vulnerabilities that the constabulary should consider when dealing with the individual.

Area for improvement 7

The chief constable of the Isle of Man Constabulary should introduce a process for identifying and assessing the vulnerability of victims, witnesses and suspects in a more consistent way.

Referral of vulnerable people to statutory agencies

There are two main ways for officers to refer vulnerable people to other statutory agencies: via a [multi-agency referral form \(MARF\)](#), or directly to the early help and support team or Child and Adolescent Mental Health Services.

The IOMC gave us data related to the MARF process. This showed that in 2021, statutory agencies didn't action 48 percent of the MARFs submitted by IOMC officers. In 60 percent of these cases, the officers shouldn't have produced a MARF, because the incident didn't meet the agreed threshold. This is despite all uniformed officers receiving training on how to complete MARFs. To address this problem, officers in the multi-agency public protection unit have produced a flow chart, designed to help officers decide when to submit a MARF and when to refer the incident to the early help and support team or Child and Adolescent Mental Health Services.

Officers we spoke to were aware of the flowchart and we saw copies of it displayed in the police stations we visited. But many officers were still confused about when they should submit a MARF. Some pointed out that everyone would have a different definition of risk and harm, and some incorrectly believed that they should only submit a MARF if there is risk of significant harm. The flowchart is also only about child MARFs and doesn't help prevent confusion about when to submit adult MARFs.

We also found that the issue of consent is an area of confusion for many officers. Constables and more senior officers variously told us that an officer:

- needs to get consent either from the individual subject to the MARF (in the case of adults) or their parents or guardian (in the case of children) for a MARF to be submitted;
- only needs consent for adult MARF; and
- needs consent for both adult and child MARFs where there isn't significant risk of harm.

The constabulary needs to produce clearer, non-contradictory guidance on when officers should submit MARFs. It should also consider introducing a standard risk assessment for all incidents, as this could help alleviate confusion.

Area for improvement 8

The chief constable of the Isle of Man Constabulary should produce clearer, non-contradictory guidance on when officers should submit multi-agency referral forms.

Initial safeguarding

The constabulary's initial [safeguarding](#) actions are generally effective, with appropriate victim care evident in all the cases we reviewed. We found some evidence of attending officers taking positive action in the domestic abuse cases we reviewed, with arrests made where appropriate.

Some other small police forces we have inspected require sergeants to attend all medium and high-risk domestic abuse incidents and direct safeguarding activities. In the IOMC, the multi-agency public protection unit domestic abuse officer reviews safeguarding in all domestic abuse incidents, but there isn't a requirement for supervisors to attend domestic abuse incidents in person.

Officers told us that sergeants attend high-risk cases, but they don't attend all medium-risk cases, depending on the circumstances. Without guidance outlining when this should happen, different sergeants make different subjective decisions. Given the inexperience of the IOMC's uniformed constables, and the gaps in the constabulary's domestic abuse guidance, supervision of immediate safeguarding is essential.

Recommendation 6

With immediate effect, the chief constable of the Isle of Man Constabulary should make sure that sergeants oversee all medium and high-risk domestic abuse incidents and direct safeguarding activities where appropriate.

While safeguarding is generally effective, our case file review found few examples of officers offering to refer victims to third-sector organisations. There was also no evidence of officers offering to refer victims of domestic abuse to [independent domestic violence advisers \(IDVA\)](#) or Women's Refuge Isle of Man in our case file review. Officers told us that they occasionally make such referrals. But clearly this either isn't routine practice or officers aren't recording it.

The constabulary should improve its guidance on third-sector referrals. Currently, the constabulary's domestic abuse business rules instruct officers to refer domestic violence victims to Women's Refuge Isle of Man, but it doesn't mention IDVAs.

Area for improvement 9

The chief constable of the Isle of Man Constabulary should improve guidance on referrals of vulnerable people to third-sector organisations and develop processes to make sure that such referrals take place where appropriate.

Use of body-worn video cameras

The IOMC has issued [body-worn video \(BWV\)](#) cameras to officers. These can be beneficial, for example, when used to record injuries to victims and the behaviour of perpetrators. They can also be used to support evidence-based prosecutions when victims withdraw their support for investigations. But the constabulary's BWV standard operating procedure doesn't clearly set out when officers should use cameras, and it is contradicted by later guidance circulated by the constabulary.

In 2020, the domestic abuse officer in the multi-agency public protection unit suggested that the constabulary updates its domestic abuse business rules to include guidance on BWV. This hasn't happened. Without such guidance, some officers in one station we visited were unsure when to use their cameras.

Area for improvement 10

The chief constable of the Isle of Man Constabulary should produce clear guidance on when officers should use body-worn video cameras.

Investigations of incidents involving vulnerable people

In our case file review, we found that officers responding to incidents involving vulnerable people usually conduct effective [golden hour](#) enquiries. In all the cases we examined, officers pursued the obvious main lines of enquiry and, where needed, secured statements, BWV and records of 999 calls promptly.

The constabulary lacks a crime allocation policy that sets out:

- which cases are referred to the constabulary's criminal investigation department or multi-agency public protection unit for further investigation after initial response; and
- which are retained by uniformed officers for investigation.

Officers from appropriate units investigated all the cases we reviewed. But investigators told us that this isn't always the case and that case allocation can be very blurred depending on how many people are on duty.

Planning and supervision of investigations

We didn't find evidence of structured investigative plans in almost all the cases we reviewed. Without a structured investigation plan, there are no defined boundaries for the investigation. In most cases, we found no evidence of recorded rationale for decisions or details of why some lines of enquiry were prioritised over others.

We also found a lack of recorded supervisory oversight in most cases. And only one of the cases we examined had an effective and meaningful supervisor's evidential review.

All the investigations we reviewed were effective. But the lack of investigative planning and supervision poses a risk.

Recommendation 7

By April 2023, the chief constable of the Isle of Man Constabulary should develop processes to make sure that:

- in all investigations, officers produce structured investigation plans that include recorded rationale for decisions or details of why some lines of enquiry were prioritised over others; and
- sergeants regularly review plans and effectively supervise and review investigations.

Support for vulnerable people

Domestic abuse orders and notices

Since 2010, police officers in England and Wales have had more powers to protect victims of domestic abuse. From 2011 until 2021, these powers took the form of [domestic violence prevention orders](#) and [domestic violence protection notices](#). Under the Domestic Abuse Act 2021, they were replaced with [domestic abuse protection orders \(DAPOs\)](#) and [domestic abuse protection notices \(DAPNs\)](#). These tools can prevent unwanted contact between the suspect and victim and so reduce the risk of repeat victimisation.

Currently, there are no equivalents in Isle of Man law, but DAPNs and DAPOs will be introduced as part of the Domestic Abuse Act. We are pleased to find that the constabulary has developed guidance and training on the use of DAPOs and DAPNs and plans to give this to officers once this legislation is in place.

Domestic violence disclosure scheme and child sex offender disclosure scheme

In 2014 and 2011 respectively, the domestic violence disclosure scheme, also known as [Clare's Law](#), and the child sex offender disclosure scheme, also known as [Sarah's Law](#), were introduced in England and Wales. These laws allow members of the public to formally ask the police whether a person with access to a child has a record of child sexual offences and whether their partner (or the partner of a close friend or family member) may pose a risk to them.

The States of Jersey has enshrined the domestic violence disclosure scheme in legislation, and the IOMC is researching whether it could work in the Isle of Man. We welcome this development.

The IOMC told us that the Isle of Man Government doesn't plan to introduce an equivalent to the child sex offender disclosure scheme in the Isle of Man, although some IOMC officers we interviewed strongly advocated its introduction. The IOMC and DHA may wish to consider examining whether doing so would help safeguard potential victims of child sexual abuse.

Working with other organisations to keep vulnerable people safe

The constabulary works closely with a wide range of local organisations both statutory, such as Manx Care and the Department of Health and Social Care, and third-sector or voluntary, including Women's Refuge Isle of Man. But, unlike many areas of the UK and the Channel Islands, a formal [multi-agency safeguarding hub \(MASH\)](#) hasn't been established. This is despite the IOMC lobbying for one for many years. However, we were pleased to find, at the time of our fieldwork, that the IOMC and other agencies had started working together to create a MASH.

There isn't a [multi-agency risk assessment conference \(MARAC\)](#) arrangement in the Isle of Man, although it is common in many parts of England and Wales.

Current informal arrangements include:

- a multi-agency meeting that discusses individuals at risk;
- a weekly referral meeting that the multi-agency public protection unit adult and child safeguarding officer attends; and
- a quarterly safeguarding board meeting that oversees the current arrangements.

These seem to work well.

Other multi-agency meetings take place, such as the complex abuse meeting for children at risk and the operations meeting where agencies share intelligence. We found that many child protection investigations result from these meetings, and safeguarding teams in social services provide ongoing support.

We encourage the constabulary to reassure itself that the lack of a structured MARAC doesn't limit the effectiveness of its partnership working and risk management.

Support for vulnerable people in the community

Neighbourhood officers give good support to vulnerable people in their communities, in partnership with local public sector organisations. This includes structured programmes of school engagement, working with local authority housing departments to help resolve neighbour disputes and acting as the constabulary's specialist point of contact for the local Operation Yarrow cohort.

We also found that neighbourhood officers are actively engaged in the wellbeing partnerships created by Manx Care in the out-of-town regions in late 2021. These partnerships bring together agencies (including the Department of Health and Social Care, Manx Care and local authorities) in one location, where they can work together to resolve local people's wellbeing issues. We found that neighbourhood officers refer vulnerable people to the partnerships, and this provides positive outcomes for the people referred.

Mental health

Detaining people with mental ill health in public places

Section 132 of the [Mental Health Act 1998](#) (as revised) describes how police officers should deal with people with mental ill health found in public places in the Isle of Man:

“(1) If a constable finds in a place to which the public have access a person who appears to him to be suffering from mental disorder and to be in immediate need of care or control, the constable may, if he thinks it necessary to do so in the interests of that person or for the protection of other persons, remove that person to a place of safety within the meaning of section 131.”

In England and Wales, the [Mental Health Act 1983: Code of Practice](#) states that police should only use a police station as a place of safety in exceptional circumstances. But there are no similar codes of practice in the Isle of Man.

Despite this, we are pleased to report that when officers remove people under section 132, they are detained at Manannan Court (a service for people experiencing a relapse or crisis of their mental health and wellbeing who need inpatient admission) or hospital emergency departments. Officers only very rarely use police custody as a place of safety. Senior managers from the Department of Health and Social Care confirmed that they are content that the police only use custody as a place of safety when it is needed.

Support from mental health practitioners

IOMC officers spend a lot of their time responding to mental health-related incidents.

In England and Wales, most police forces have mental health triage schemes to help give people in crisis the right support and reduce the number of such people taken into police custody. These schemes involve police officers contacting mental health nurses, who then assess the needs of the person suspected of experiencing a mental health crisis. In some schemes, nurses conduct face-to-face assessments at the scene of the incident.

To improve the effectiveness and efficiency of the IOMC's response to mental health-related incidents, in 2017 the constabulary and the Department of Health and Social Care piloted a similar scheme (the Mental Health Police Liaison Service). Under the pilot scheme, mental health nurses worked from IOMC's custody suite. While there, they:

- could quickly go to the ESJCR to give advice to the FIM and operators when they were dealing with mental health-related incidents;
- gave custody officers and sergeants advice, which resulted in some people being detained for less time;
- responded to mental health-related incidents alongside police officers more regularly and more quickly than had happened before the pilot scheme;
- learned more about policing, which officers told us helped improve the support they could give; and
- helped educate IOMC officers about mental health issues.

We found a consensus among the IOMC officers we interviewed that the pilot scheme had proved effective in reducing police use of coercive powers and in getting help to vulnerable people quickly.

In 2020, the IOMC sent the DHA a business case that asked for the pilot scheme to be adopted as normal practice. But funding wasn't forthcoming, so the trial was discontinued, and the mental health nurses were moved back to Manannan Court.

Under the new arrangements, a mental health nurse visits the custody suite every morning. Nurses continue to go to mental health incidents with officers, but this happens less often than during the pilot scheme.

During the pilot scheme, the IOMC's use of its powers to detain persons with mental ill health found in public places decreased, but since the pilot ended its use has increased. The Department of Health and Social Care has found that the constabulary has started to use these powers too swiftly, on occasion, when the mental health nurses at Manannan Court aren't available.

Most IOMC officers also told us that the pilot was better than the current system. They said: "It would certainly be better to have [the nurses] back in headquarters." They also told us they were "desperate to have mental health professionals here permanently." They are waiting longer at hospitals for mental health professionals to arrive, which means they have less time for their other core duties.

One officer told us of a recent example that shows the benefit of having nurses working at the IOMC's headquarters. While a mental health nurse was visiting the custody suite, the ESJCR received a call relating to a person with suicidal intent. ESJCR operators told the nurse about this. As the nurse knew the individual, they called them directly and was able to manage the situation. They also knew that the person would react badly to police arriving with sirens, which would have happened if the police had just dispatched.

In previous reports, we have previously highlighted that police forces in England and Wales spend vast amounts of time dealing with the aftermath of a mental health issue in the community, when there are better-trained medical professionals who can take over following the initial police response. IOMC's senior management has made representations to the Government seeking the reintroduction of the piloted arrangements. We encourage the Isle of Man Government to review its decision to end the piloted process. It should consider what processes it could introduce to improve how the constabulary deals with mental ill health.

We are aware that there are good working relationships between the Department of Health and Social Care and the IOMC at strategic and operational levels. At a senior level, they hold regular meetings to discuss performance and monitor whether the pilot scheme arrangements or something similar should be reintroduced.

Missing people

Initial response and risk assessment

Appropriate officers conduct [missing persons](#) investigations. The constabulary generally appoints the officer who is the first to attend a missing persons incident as the officer in charge of the investigation for the duration of their tour of duty. This is different for high-risk incidents, which the constabulary refers to sergeants. The officers we interviewed showed that they knew and understood these procedures.

Officers had conducted risk assessments for all the missing persons cases we reviewed. The quality of most of these assessments was good. But in some of the incidents we reviewed, the officer in charge hadn't answered the questions designed to assess whether the missing child was at risk of child [sexual exploitation](#). We weren't able to tell whether these sections were blank because:

- they weren't applicable in those specific incidents;
- the officers had ignored the form; or
- the officers hadn't considered whether there was a risk of child sexual exploitation.

It is important that officers complete a risk assessment form. We encourage the constabulary to make sure this happens consistently.

The constabulary has found that criminal groups look to exploit children and vulnerable adults to move and store drugs and money in the Isle of Man. Despite this, the missing persons form doesn't include any questions to assess whether the missing person is at risk of criminal exploitation.

Area for improvement 11

The chief constable of the Isle of Man Constabulary should update the missing persons form to include a criminal exploitation risk assessment.

Missing persons investigations

The IOMC conducts effective missing persons investigations. In 2021, all missing people were found within 24 hours.

Most missing persons are young people, reported missing just once. But the Isle of Man has a small number of people who repeatedly go missing.

Manx Care and the Department of Health and Social Care told us that the constabulary responds well to reports of missing people from care facilities and children's homes.

In the five missing persons cases we reviewed, officers conducted effective initial investigations and found all five people. Officers secured photographs where possible and carried out house and room searches. We also saw evidence that officers commissioned financial checks through the constabulary's economic crime unit and liaised with the police search adviser and UK police forces where necessary.

But we found that officers often don't record enough information about the investigations. For example, officers had completed the missing persons form's action log in only three of the five cases we reviewed. And while they had recorded some actions, these entries tended to be brief. Few records included the officers' rationale for pursuing, or for not pursuing, particular lines of enquiry.

The constabulary should also revise its missing persons form. The form lists actions 'to be considered' by the officer when conducting their investigation. These include obtaining a photograph and searching the house. These are essential actions in missing persons investigations; the guidance shouldn't present them as discretionary tasks. Officers had conducted these actions in all the cases. But some officers told us: "Searches are conducted in all the cases we need to do them, but not in all cases." As the constabulary has an inexperienced workforce, it should update the form with unambiguous language.

Trigger plans

The College of Policing's [missing persons APP](#) states:

"Where it is assessed that the individual is at risk of going missing again, the police officer in charge of the investigation should ensure that information gathered is used to create a plan outlining key actions to be taken if the person is subsequently reported missing."

Officers told us that the constabulary doesn't have such plans (known as [trigger plans](#)) for most of the people who regularly go missing from care homes. The exceptions to this are the cohort of children who are subject to Operation Yarrow. As a result, each time a person goes missing, the officer in charge of the investigation must repeat searches on the constabulary's intelligence and other systems.

Governance

The management and oversight of missing persons investigations are generally effective.

The IOMC has produced a policy that gives clear guidance, describing the points at which supervisory officers must be informed of missing persons. It also sets out arrangements for ongoing supervision, senior officer reviews and formal meetings with partner organisations.

Our audit showed that sergeants are informed as soon as reasonably practical of low- and medium-risk cases and that inspectors are informed immediately where a high-risk case has been reported.

These supervisory officers co-ordinate the initial inquiry, give other officers guidance and resources where necessary and, if the case is high-risk, arrange help from other agencies. This seems to work well.

Managing offenders and suspects

Apprehending and managing suspects and offenders to protect the public from harm

Outstanding suspects feature as an agenda item in the constabulary's daily management meeting. Suspects who pose the greatest risk, or are the most difficult to apprehend, are prioritised. At the meeting, managers brief officers about the suspects they need to arrest. But we didn't see as much evidence of follow-up by managers as we would have hoped.

We saw evidence of good links between the IOMC and UK police forces in cases where UK police forces had located suspects wanted by the IOMC. In such cases, the IOMC usually sends officers quickly to the UK to bring the suspects back.

We were pleased to find that the IOMC has full access to the [UK Police National Computer \(PNC\)](#) and that it has trained PNC operators. They can add details of high-risk subjects so that UK police forces can access the relevant information.

Where an arrest of a wanted UK suspect is necessary, the island's legislation dictates that a warrant for the arrest needs to be sworn out within its jurisdiction and confirmed in the UK for an arrest to be lawful. We saw examples where UK-based suspects who had travelled to the island were arrested by the IOMC.

There is an automated process that makes sure that the constabulary notifies the [criminal records office](#) of all foreign nationals arrested in the Isle of Man.

Managing the risk that registered sex offenders pose

At the time of our inspection visit, there were 56 registered sex offenders living in the constabulary area. A specialist officer with recent UK police experience assesses and manages the risks these offenders pose. This includes collating information from the prison and probation service, visiting offenders to make sure they comply with conditions imposed under court orders, and updating the sex offender register. Other officers have had some limited training to help the specialist officer when needed, but the constabulary finds it difficult to conduct all visits regularly.

Police practice

The specialist officer lacks portable IT equipment to help him to search offenders' mobile phones for evidence of inappropriate content or contact. The constabulary recently obtained the software but is waiting for hardware.

Sexual and violent offenders have regular contact with the police officers responsible for their management. This presents the offenders with opportunities to harm or exploit these officers. The College of Policing recommends that police forces should vet such officers when they take up post and regularly thereafter. But the IOMC doesn't do this. While the IOMC doesn't have to comply with this recommendation, doing so could reduce the risk of offenders exploiting these officers.

Area for improvement 12

The chief constable of the Isle of Man Constabulary should make sure that it vets officers managing sex offenders before they take up post, and re-vet them at least every three years.

The constabulary has processes in place to minimise the risk of harm to officers. It uses the [active risk management system](#) to assess the level of risk posed by offenders. This is the standard process used by most police forces in England and Wales.

Before the specialist officer and colleagues visit offenders, neighbourhood police conduct an operational risk assessment. This is to make sure the officers conducting the visit are safe and secure. This is similar to operational risk assessments for other policing activities. But it isn't appropriate in this scenario, as sex offenders can pose particular risks associated with their criminality, such as manipulation. The IOMC's guidance states specialist officers' supervisors and managers should carry out risk assessments for home visits to offenders and record them. But they aren't doing this.

Area for improvement 13

The chief constable of the Isle of Man Constabulary should make sure that supervisors and managers of specialist officers, rather than neighbourhood officers, carry out and record risk assessments for home visits to offenders.

Legislation

Current legislation is a barrier to the IOMC's offender management work. If someone is placed on the sex offenders' register, they don't have to register every 12 months. Also, they don't have to answer the door when the specialist officer visits after 12 months, and the IOMC has no power to force them to do so. Tynwald (Manx parliament) is introducing a new Act in 2022 which will resolve this and mirror UK legislation.

Partnership working

The constabulary uses sexual offence prevention orders well. The Attorney General's Chambers applies for orders as part of the sentencing process following discussion with the specialist officer. The constabulary treats breaches of orders seriously and responds promptly.

The Sexual Offences and Obscene Publications Act 2021, which is due to be implemented in 2022/23, will:

- change sexual offence prevention orders to sexual harm prevention orders;
- help the chief constable to apply for sexual harm prevention orders; and
- help police to apply for amendments to orders on people who are due to be released from prison. This is to make sure orders that may be outdated are relevant to the offenders' release periods.

Staff wellbeing

The IOMC has recently introduced a wellbeing strategy, based on a staff survey and internal reviews of staff wellbeing. It arranges mindfulness workshops, fitness classes and diet and nutrition advice, and publicises wellbeing messages from the staff wellbeing group on the intranet and on noticeboards. The constabulary has also arranged support for staff through the island's mental health services, a UK-based charity Rock2Recovery and locally-supplied cognitive behavioural therapy.

The IOMC works in line with the [Blue Light Wellbeing Framework \(Oscar Kilo\)](#) to maintain and improve the wellbeing of all staff. The constabulary has identified which roles pose the greatest risks to officers' emotional wellbeing. It arranges for officers in these vulnerable roles to have regular meetings with psychologists. The constabulary also trains supervisors on how to give wellbeing support to their staff.

There was consensus among the officers and staff we interviewed that the introduction of the wellbeing strategy has led to a greater focus on staff wellbeing.

Serious and organised crime

Understanding serious and organised crime

SOC poses a threat to the public. Individuals, communities and businesses feel its damaging effects. Police forces that are effective in this area don't only prosecute offenders but also disrupt and prevent organised criminality at a local level.

We assess the constabulary's ability to investigate SOC and reduce re-offending below.

Understanding the threat

To tackle SOC effectively, the police must have a good understanding of the threat this type of crime poses to the public. Police forces should be using a range of intelligence (including intelligence from other organisations) to understand crimes ranging from drug dealing and money laundering to more recently understood threats such as cybercrime and child sexual exploitation.

To co-ordinate activity and help decide priorities, effective police forces use the [national intelligence model](#) and the UK Government's [serious and organised crime strategy](#). These promote comprehensive strategic threat and risk assessments, intelligence collection plans, intelligence-led tasking, [organised crime group mapping](#), and sharing information with partner agencies and uniformed police officers.

The IOMC has a reasonable understanding of the threats that SOC poses to its communities. The constabulary has produced a strategic threat and risk assessment, based on intelligence reports and crime levels. The constabulary uses MoRiLE to identify the biggest organised crime threats and prioritise them. Drawing on this, the constabulary has identified drug trafficking and other SOC threats, such as child sexual exploitation, as priorities.

Through Operation Yarrow, the IOMC is using information and intelligence from other organisations to develop a good understanding of the threat of criminal and sexual exploitation of children. It has also developed an understanding of the SOC threat from outside the Isle of Man. During 2021, in collaboration with other agencies, the IOMC produced a borders assessment that identified key threats and vulnerabilities linked to SOC and the weakness of the IOM border.

But the constabulary lacks robust intelligence collection processes. This limits its understanding of the SOC threat. While the constabulary has developed its SOC priorities, it hasn't developed comprehensive [intelligence requirements](#) to identify intelligence gaps about SOC activity and [organised crime groups \(OCGs\)](#). Nor does it have an intelligence collection plan to address these gaps.

The absence of a defined comprehensive SOC intelligence requirement and an intelligence collection plan limits the constabulary's ability to gather SOC-related intelligence from officers across the constabulary. As we note in our 2016 report, [PEEL: Police effectiveness – A national overview](#), police forces that involve uniformed officers in the fight against organised crime, by telling them about the organised criminals in their area and giving them actions designed to fill intelligence gaps, have more intelligence collection, more disruption opportunities, and a greater long-term ability to spot the signs of potential organised crime at an early stage.

The IOMC's uniformed officers told us that they are keen to be involved in this type of work. They said: "We know who the local criminals are." Given the size of the Isle of Man, this is to some degree inevitable. But with the high proportion of new officers, the arrival of OCGs from the UK and emerging offenders who have grown up on the island, reliance on local knowledge isn't enough. The constabulary also doesn't routinely tell local officers what information to collect to fill intelligence gaps.

The IOMC could also do more to gather SOC-related intelligence from other public sector agencies, such as the Isle of Man customs and immigration services, and tackle this type of criminality in collaboration with them. The IOMC may wish to develop and circulate a clear SOC intelligence requirement to the main public sector agencies it works with to tackle SOC. This will help other agencies contribute to collecting relevant intelligence on the SOC priorities of the Isle of Man.

Alongside other government departments, the constabulary should also consider developing a multi-agency SOC partnership board. In those police forces that use them, they help to identify the threat, vulnerability and risk from SOC in a local area, and help police and local partners form a multi-agency action plan to reduce its effect.

The IOMC also hasn't yet produced any intelligence-based analytical products, such as [problem profiles](#), network analyses or market analyses for other emerging threats, such as human trafficking or forced labour. The constabulary's intelligence unit doesn't have enough staff to conduct such analyses for all SOC threat areas.

The College of Policing requires police forces in England and Wales to map OCGs in accordance with national guidance. By mapping OCGs and scoring them against a range of indices, they develop a more detailed picture of serious and organised criminality. Although the IOMC isn't obliged to map OCGs, we were pleased to find that it has started to do so, working with the North West [regional organised crime unit \(ROCU\)](#).

Responding to serious and organised crime

We encourage police forces in England and Wales to tackle SOC through a 4Ps approach: prevent, pursue, protect and prepare. Many police forces develop SOC control strategies using the 4Ps framework. These set out the activity they will carry out in each area to address their SOC threats. They develop specific 4Ps plans for each mapped OCG. The IOMC hasn't done this. It doesn't follow a 4Ps approach, and while it undertakes some activity aimed at preventing SOC, it mainly tries to address SOC by pursuing criminals and arresting and charging them. The constabulary would be more efficient and effective at tackling SOC and keeping people safe if it adopts the 4Ps approach to tackling serious and organised crime, in partnership with other agencies.

Area for improvement 14

The chief constable of the Isle of Man Constabulary should develop a 4Ps approach to tackling serious and organised crime.

The constabulary hasn't adopted a structured and independent means of assessing disruptions. Such assessments would provide a basis to measure the effect of police activities. And where disruption activity has been effective, it could re-assess the threat posed by the OCG it targeted.

In England and Wales, police forces try to measure how much of an effect police disruption has had on a particular OCG, and ROCUs play an important role in moderating these assessments. The process that these police forces use to measure disruptions is still maturing. But it could prove a useful template for the IOMC to adapt, so that it reflects the differences in the Isle of Man.

Area for improvement 15

The chief constable of the Isle of Man Constabulary should develop a means of assessing disruptions with the North West regional organised crime unit.

The IOMC's strategic tasking and co-ordinating group oversees the constabulary's response to SOC at a strategic level, in accordance with the threats identified in its strategic threat and risk assessment. We examined the structure, the agenda and the most recent set of board notes and found that it works well.

Appropriate people attend the meeting, which focuses on the SOC priorities set by the constabulary. Attendees make effective decisions and direct activity. They sanction action against OCGs, discuss updates and reviews, monitor progress and authorise resources. They also assess the constabulary's performance in tackling SOC by reviewing data that includes drug seizures, proceeds of crime recoveries and arrests.

The detective chief inspector responsible for SOC manages tactical decisions and updates on a weekly and daily basis.

The IOMC has a range of tactical units dedicated to SOC work. Specialist intelligence and investigative officers are generally effective at developing operations and investigations to target OCGs. The detective chief inspector often directs a team of uniformed officers to execute search warrants and target OCG members and can direct specialist officers to conduct surveillance.

Teams tackling drug trafficking and organised crime have access to appropriate technical equipment. They are relatively well resourced, given the size of the constabulary. The IOMC can carry out the lawful interception of communications, like other police forces in England and Wales. It also has the right staff to be able to conduct a range of other covert activities. Two commissioners, one for surveillance and another for the interception of communications, provide oversight of all such activity. They report publicly to Tynwald each year (see the [Interception of Communications Commissioner's](#) and [Surveillance Commissioner's](#) websites).

Case study

One example of an operation that was conducted well, and one that involved uniformed officers, was Operation Strongbox.

The IOMC began this operation when it was aware that the borders were likely to re-open following the pandemic. The threat was OCGs from the UK returning to fill gaps in the drug market and move drug money. The constabulary deployed officers to outgoing and incoming boats. It told them to look specifically for 12- to 14-year-olds in suspicious circumstances (both bringing drugs in and taking money out). Its first month led to the recovery of three firearms and the seizure of £100,000 worth of drugs and criminal money at the island's ports.

Prior to the constabulary deploying officers on Strongbox, it gave them a briefing (which included the characteristics of typical couriers and drug dealers). There were three phases:

- white (officers patrolling in specific locations);
- amber (multi-agency action with the port authority and Isle of Man Customs and Excise); and
- red (response to intelligence from UK agencies).

Case study

Another operation involved the dismantling of an OCG based on the Wirral, which has supplied cannabis, cocaine, and ketamine to the Isle of Man since the beginning of the pandemic.

For the first time, the constabulary used powers enshrined in the [Organised and International Crime Act 2010](#), which was intended for use in combating international money laundering, to address groups trafficking drugs from Merseyside.

The [Organised and International Crime Act 2010](#) makes membership of an organised criminal network a criminal offence. The most significant member of the Wirral-based network (see case study, above) is facing charges under the Act, as are several local people, one of whom was instrumental in running the network despite being in the Isle of Man Prison.

The IOMC's success in tackling drugs importation is reflected by the number of inmates at the Isle of Man Prison serving lengthy sentences for drugs supply and/or money laundering offences. In September 2021, 55 of 109 inmates (50.5 percent) were either serving sentences for such offences or were on remand. But this success has led to patrol officers continuing to investigate some fairly serious cases, rather than these cases being taken on by detectives.

We also found that the IOMC has learned from its SOC operations. In one example, Operation Atomic, lack of police resources caused the premature closure of enforcement activities. Following an internal review, improvements such as better UK collaboration and increasing the number of surveillance-trained staff were put in place. We acknowledge the difficulties that a small island constabulary such as the IOMC has in trying to provide community policing with increasing threats and demands from SOC.

The IOMC is continuing to build further collaborative arrangements with agencies, developing agreements with the Isle of Man Steam Packet Company and the Isle of Man Post Office. This includes the constabulary submitting a request to the government to use the seized assets fund to pay for a new scanner for incoming post. The scanner will help detect incoming prohibited articles, such as controlled drugs, and outgoing criminal property, such as illicit cash. The IOMC has made effective use of the seized assets fund, which has provided surveillance vehicles and, most recently, recording devices such as cameras and voice recorders.

The IOMC is currently working with the Isle of Man Immigration Service and the Attorney General's Chambers to require ferry companies to supply passenger information. This, as it is developed, will increase checks and intelligence gathering at the border.

Most detectives are young in service and haven't completed the College of Policing's initial crime investigators development programme, while some supervisors haven't had appropriate leadership training. To better meet the challenges of SOC, the constabulary needs to address these training needs. It has tried to disseminate learning opportunities from conferences, UK-based police forces and more experienced officers, but this is no substitute for standardised comprehensive training.

Recommendation 8

By October 2023, the chief constable of the Isle of Man Constabulary should recommence sending detectives and detective sergeants on the College of Policing's crime and leadership training courses.

The IOMC has a limited number of detectives and other specialist officers to tackle SOC. To complement its specialist resource, in order to deal with recent SOC operations, the constabulary has seconded uniformed officers into detective teams. It has also seconded detectives from non-drugs teams into drugs work. This is having a negative effect on the resources deployed in other policing activities.

The IOMC could be more effective at tackling SOC if it had more specialist resources. It is difficult to see how the constabulary could achieve this from its existing establishment of police officers without reducing the effectiveness of its other work.

Preventing serious and organised crime

To effectively tackle SOC, police forces need to be able to stop people from being drawn into it. Many of these people may be vulnerable and already involved in gang and youth violence. Police forces should also use a range of approaches and powers to prevent known criminals from continuing to cause harm.

The IOMC conducts some activity to prevent and deter SOC. This includes its attempts, through Operation Yarrow, to divert young people at risk from exploitation by OCGs and its work with the Isle of Man Post Office to disrupt drug importation. But there is still scope for the constabulary to do more. It could replicate the analytical approach that underpins Operation Yarrow and use it for other SOC threats. Establishing a multi-agency SOC partnership board would likely generate more opportunities for prevention and deterrence activity.

The IOMC could also do more to involve neighbourhood officers in tackling SOC. The constabulary is aware of OCG members and troubled families, but we found it was conducting little activity apart from liaising with schools to prevent younger siblings and partners of criminals from being drawn into organised crime. As the constabulary doesn't brief patrol officers on OCGs, it has missed a chance to engage with high-risk individuals and families and divert them from crime.

Once the constabulary has mapped all its OCGs, it could appoint neighbourhood officers as [lead responsible officers](#) for some of the lower-risk groups and organised criminals. This would formally bring neighbourhood policing into the constabulary's fight against organised crime.

The constabulary also lacks the tools that police forces in England and Wales use to monitor convicted OCG members and prevent them from re-offending. In England and Wales, the [Serious Crime Act 2007](#) introduced orders. Through these, courts can impose extra restrictions on serious offenders to help manage the risk of them offending again. These include [serious crime prevention orders](#) and civil orders to prevent or deter serious crime. These orders can impose far-reaching restrictions on a convicted person's ability to:

- use communications devices, such as mobile phones;
- hold specific types of business bank accounts;
- communicate or interact with criminal associates; and
- visit certain locations.

No such legislation exists in the Isle of Man. The IOMC, along with the DHA, should consider introducing similar orders.

Area for improvement 16

The Department of Home Affairs should consider whether ancillary orders such as serious crime prevention orders would help prevent serious and organised crime.

The IOMC's prison liaison officer has a good working relationship with the Isle of Man Prison and Probation Service. Changes have been made to make the prison release application process more efficient. The prison liaison officer has also given anti-corruption presentations to prison officers. The IOMC has access to the prison IT system, which means it can review all prison intelligence submitted by Isle of Man Probation and Prison staff. Where appropriate, it copies this onto the IOMC's CONNECT system. This has proven to be an effective approach within Operation Yucca (an operation built from intelligence that led to the prosecution of a prison officer for bringing prohibited articles into the Isle of Man Prison).

We examined the work done on drug importation.

The street prices for controlled drugs in the Isle of Man are about double those in Liverpool. Organised criminal groups from Merseyside and elsewhere in the UK seek to exploit the higher street prices in the Isle of Man by supplying controlled drugs to the island. They do this by working with small, but increasingly sophisticated, local OCGs. During the pandemic, there were severe travel restrictions, so supply methods and routes changed. But before the pandemic, OCGs focused much of their efforts on using couriers to transport drugs into the Isle of Man.

Many of the people used by the groups were vulnerable or had drugs debts owed to criminals in Liverpool. Additionally, criminals made sophisticated efforts to transport drugs using motor vehicles with specially constructed compartments. These vehicles were electronically linked to suppliers in Liverpool so they could watch progress or interference.

The IOMC identified several OCGs in Liverpool that were involved in the trafficking of drugs into the Isle of Man. The constabulary conducted a series of linked operations to disrupt these networks and reduce the supply of controlled drugs.

During the pandemic and well into the second half of 2021, those involved in the supply of controlled drugs sought to adopt alternative means of managing their networks. Criminals made extensive use of the postal system and courier services.

Date range	Class A	Class B	Class C	Total
19 July 2020 to 18 July 2021	18	147	14	179
19 July 2019 to 18 July 2020	19	87	9	115
19 July 2018 to 18 July 2019	10	25	3	38

Source: IOMC. IOMC drug investigations at the Isle of Man Post Office (2018–21)

The constabulary identified a [county lines](#)-type network forming, which was starting to exploit young and vulnerable people. This included using these young and vulnerable people to become involved in supply networks by receiving postal packages. Criminals had threatened and intimidated them and, in some cases, had promised them a financial reward. Police efforts focused, to a considerable degree, on disrupting such activity.

The annual total street values of drugs seizures in the Isle of Man have been broadly constant for the last three years.

Governance

Separation of powers and responsibilities

The [Police Act 1993](#) sets the statutory basis for policing and police governance in the Isle of Man. It clearly sets out the responsibilities, powers, functions and roles of key agencies responsible for managing and providing policing governance. It also gives a robust framework within which they work.

The powers of police governance principally sit with the DHA. This differs from the governance arrangements in England and Wales. There, the government delegates police governance to locally elected police and crime commissioners. The DHA is responsible for maintaining “an efficient and effective police force” for the Isle of Man. It also has wide-ranging roles and powers, as set out in the Police Act 1993.

These include:

- deciding policies, objectives and priorities;
- giving general directions to the chief constable outlining how those policies objectives and priorities may be achieved;
- appointing the IOMC’s chief constable, following consultation with ministers;
- initiating dismissal proceedings against the chief constable if this is considered in the public interest or in the interests of efficiency and effectiveness of the IOMC;
- serving as the employer of police officers and staff; and
- managing the IOMC’s estate and fleet and providing equipment, and funding as necessary, for effective policing in the Isle of Man.

The DHA and the IOMC signed a joint protocol in 2021. This further defines the working relationship between the two organisations. It gives clarity on their respective roles and responsibilities. It frames the relationship between the DHA and the chief constable as a collaborative one, based on negotiated agreement.

It is crucial that policing governance arrangements don't impinge on a chief constable's operational independence. Section 3 of the Police Act 1993 is clear that the IOMC is under the direction and control of the chief constable. The protocol reaffirms this, stating:

“The operational independence of the chief constable is set out in the Police Act 1993. Nothing in this document limits that independence, nor is any attempt made to provide a detailed description of it.”

Interviewees told us that the DHA and the IOMC's leadership understand the arrangements. The DHA gives new ministers and members of Tynwald induction briefings explaining the position. And the IOMC's chief constable helps make sure other parties clearly understand their roles and responsibilities.

This works well. Since 2011, it has been rare for any confusion about roles and responsibilities to cause problems, or for any party to exceed its remit. But amending the protocol to explicitly outline the operational independence of the IOMC would be beneficial.

Recommendation 9

By April 2023, the Department of Home Affairs and the chief constable of the Isle of Man Constabulary (IOMC) should consider amending the protocol setting out the relationship between the two organisations to explicitly outline the operational independence of the IOMC.

There is a risk that a future chief constable appointed from the UK might not quickly understand the constabulary's unique governance arrangements. The constabulary and the DHA recognise this risk and have attempted to mitigate it by developing an induction programme and mentoring arrangements.

External scrutiny and oversight

Priority setting

The DHA, in accordance with section 4a of the Police Act 1993, sets the direction for policing through its annual policing plan. The plan outlines the constabulary's policing priorities, decided by the DHA following consultation with the chief constable. The plan is informed by:

- the government priorities set out in the [Isle of Man strategic plan](#);
- the DHA's delivery plan;
- other government strategies (for example, [the Isle of Man Government road safety strategy](#));
- consideration of the IOMC's annual assessment of threats and risks; and

- other IOMC strategies.

The IOMC also seeks the views of all local authorities. The DHA then takes these into consideration when deciding the policing priorities.

But the public is unable to influence policing priorities. Section 18 of the Police Act 1993 required the DHA to establish a police consultative forum. The forum was designed to find out the public's views on policing and crime prevention. But the forum lacked clear terms of reference and scope. This means it lacked focus and occasionally strayed into operational issues.

In 2011, the then-minister for home affairs disbanded the forum. Since then, the forum has been suspended and there haven't been any formalised structures to allow the public to escalate local policing priorities to the DHA.

It can be difficult to generate community engagement in policing. To strengthen local input in policing and legitimacy, the DHA should reinvigorate this work. It should re-establish a police consultative forum, or similar body, with clear aims and terms of reference. It should also set up a public engagement strategy that feeds into the annual policing plan and priorities.

Recommendation 10

By April 2023, the Department of Home Affairs should:

- set up a public engagement strategy that feeds into the annual policing plan and priorities; and
- re-establish a police consultative forum, or similar body, with clear aims and terms of reference.

External performance management

The DHA has formal processes to scrutinise and oversee the IOMC's performance against the strategic plan and policing priorities. The constabulary:

- produces quarterly performance reports aligned to the policing plan;
- reports to the DHA at quarterly formal performance report meetings;
- reports on its performance in areas that feature in the DHA's delivery plan; and
- submits an [annual report](#) to the DHA.

The constabulary's annual report is laid before Tynwald. Tynwald also scrutinises the constabulary's performance through a series of standing scrutiny committees and through select and special committees. The standing social affairs policy committee, the public accounts committee, and the constitutional and legal affairs and justice committee also hold the IOMC to account. For example, the chief constable gave evidence about youth justice to the constitutional and legal affairs and justice

committee in March 2022 (see [Hansard, Douglas 7 March 2022](#)). This provides direct democratic governance over all aspects of policing in the Isle of Man.

But there isn't a formal regular reporting mechanism that allows the DHA to scrutinise the constabulary's use of many of its operational powers, such as stop and search, use of force, and police bail.

Recommendation 11

By April 2023, the Department of Home Affairs should start regularly scrutinising the constabulary's use of operational powers such as stop and search, use of force, and police bail.

There also aren't enough processes to allow structured public scrutiny of the constabulary's performance.

Since 2017, the constabulary has increased the range of data it publishes in the chief constable's annual report. This has increased transparency. But there aren't any other formal processes for the constabulary to publicly report its performance.

The DHA should start conducting its police performance meetings in public. This would give greater transparency. It should also make minutes of such police scrutiny meetings available to the public on its website.

Recommendation 12

By October 2023, the Department of Home Affairs should start conducting police performance meetings in public.

Section 18 of the Police Act 1993 required the DHA to establish a police advisory group. Until it was disbanded in 2011, the group provided external scrutiny of the constabulary's performance. Its membership included:

- a representative of the DHA;
- members of Tynwald (representing constituencies from around the Isle of Man); and
- representatives from local organisations to represent the community.

The group helped the DHA in the exercise of its statutory functions and gave advice and expertise on all aspects of governance. This included:

- examining policing policies and initiatives;
- assessing the constabulary's performance against the policing plan;
- evaluating the chief constable's annual report;

- reporting on crime and detection statistics; and
- providing advice and recommendations about policing and crime prevention.

Reinstating the group would be another way to increase public engagement and legitimacy.

Area for improvement 17

The Department of Home Affairs should consider re-establishing the police advisory group.

Complaints

Complaints regulatory framework

The Isle of Man's regulatory framework for police conduct and performance is very similar to those in England and Wales. But some aspects need to be revised.

Schedule 1 of the Police Act 1993 gives the legislative basis for the police complaints system. Details of what should happen once someone lodges a complaint against the IOMC are outlined in subsequent regulations (the [Police \(Complaints\) Regulations 1994](#), the [Police \(Conduct\) Regulations 2015](#) and the [Police \(Performance\) Regulations 2014](#)).

The IOMC has included a non-statutory initial dissatisfied customer process. This aims to resolve complaints at the lowest possible level.

If a person isn't satisfied with the dissatisfied customer approach, then they must indicate this to the officer handling their complaint. At this point, the complaint will enter the statutory process.

The statutory process has two pathways:

- An informal complaint: the IOMC can only deal with a complaint informally where the member of the public gives consent, and where the chief constable is satisfied that the complaint (if proven) wouldn't represent a breach of the professional standards leading to misconduct or gross misconduct. In practice, the chief constable delegates this assessment to officers in the IOMC's [professional standards department](#).
- A formal complaint: where the chief constable believes a complaint isn't suitable for informal resolution, they consult the [Police Complaints Commissioner \(PCC\)](#) and appoint a police officer to investigate it formally. The constabulary can also initiate a formal complaint if attempts to investigate it informally have failed.

The PCC must supervise investigations where the complaint relates to the conduct of a member of the IOMC:

- who is alleged to have caused death or serious injury; or
- where the allegation relates to an offence under the [Bribery Act 2013](#); or
- where the allegation relates to any other offence specified by the DHA under regulations made under the Police Act 1993.

The Police (Conduct) Regulations 2015 defines a conduct matter as:

“Any matter where there is an indication (whether from the circumstances or otherwise) that the officer concerned may have committed a criminal offence, or, behaved in a manner which would justify the bringing of disciplinary proceedings.”

The PCC may also choose to supervise an investigation where they believe it to be in the public interest to do so. Where the PCC supervises a complaint, they may give directions to the person undertaking the investigation.

There are five problems with this complaints framework:

Problem 1

The PCC is responsible for supervising investigations of serious complaints against IOMC police officers under the rank of chief constable. They also supervise investigations of other formal complaints against a police officer, where it is in the public interest. But the commissioner’s role is to supervise complaints investigations, which are conducted by senior IOMC officers. Unlike the England and Wales [Independent Office of Police Conduct \(IOPC\)](#), the PCC lacks the powers to directly investigate a complaint and lacks the staff to manage complaints.

While the supervised process is generally enough for most investigations, there is no option to commission an independent investigation. This is a fundamental problem of the current system. There also isn’t a process to allow complaints to be investigated independently (with the exception of complaints directly relating to the conduct of the chief constable, which can be referred to a UK police force). The Isle of Man Government should create an independent police complaints investigation process.

Recommendation 13

By October 2023, the Department of Home Affairs should create an independent police complaints investigation process.

Problem 2

The Police Act 1993 doesn't contain provision for the IOMC to self-refer a case to the PCC. If a person dies after contact with the police, the constabulary can only refer this to the PCC if someone lodges a complaint about the incident. Similarly, the constabulary can't self-refer matters it has discovered during internal investigations to the PCC. By contrast, in England and Wales there are established voluntary referral processes. And the IOPC encourages police constabularies to refer matters of public interest, legitimacy and confidence to the respective complaints and conduct authorities.

A 2010 DHA review of the police complaints system identified this problem. And, six years later, the [Police \(Amendment\) Act 2016](#) made provision for the IOMC to self-refer conduct matters to the PCC. But the additional secondary legislation required for this to work is still lacking. This is still a fundamental omission in the current complaints framework and requires urgent review.

Recommendation 14

By April 2023, the Isle of Man Government should consider amending current legislation to allow the chief constable to self-refer matters to the Police Complaints Commissioner.

Problem 3

The Police (Complaints) Regulations 1994 and the Police (Conduct) Regulations 2015 don't fully align. As a result, there is ambiguity in the complaints regulations. The regulations can be interpreted that any complaint against the chief constable must automatically be referred to a UK chief constable for investigation. The legislation doesn't explicitly provide for an initial assessment of conduct to determine whether the complaint is misconduct or gross misconduct, as would be the case for a complaint against any other police officer.

Recommendation 15

By April 2023, the Isle of Man Government should consider amending regulations to allow the Department of Home Affairs or Police Complaints Commissioner to conduct an initial assessment of complaints where allegations are made of misconduct by the chief constable and senior officers.

Problem 4

The regulations are unclear about what should happen if the chief constable considers that a complaint is informal (as described under the Police Act 1993), but the complainant doesn't accept the constabulary's informal resolution. The regulations should be amended to give clearer guidance on how people can appeal an informal complaint and make it a formal complaint in these circumstances.

Recommendation 16

By April 2023, the Isle of Man Government should consider amending regulations to give clearer guidance on how people can escalate an informal complaint to a formal complaint when the complainant doesn't accept the constabulary's informal resolution.

Problem 5

The PCC lacks powers to issue statutory guidance to the IOMC about investigating complaints. The IOMC uses guidance issued by the IOPC to inform the processes carried out in respect of police complaints.

Recommendation 17

By April 2023, the Isle of Man Government should consider amending regulations to give the Police Complaints Commissioner power to issue statutory guidance to the Isle of Man Constabulary about investigating complaints.

IOMC's complaints processes

The IOMC has systems to record, handle and resolve complaints. But the constabulary has only published a summary of the process online. Publishing more details of the process would increase transparency and legitimacy. During the inspection, we were pleased to find that the constabulary was working to post more details about the complaints process online and to make it more accessible.

Annex A – Recommendations

First contact: emergency calls

1. By April 2023, the manager of the emergency services joint control room (ESJCR) should identify and implement improvements in the call-handling system's question sets for police calls, to better meet the needs of vulnerable victims.
2. With immediate effect, the chief constable of the IOMC should make sure that the ESJCR always has a FIM present. Once the chief constable is confident that ESJCR operators are evaluating and recording vulnerability accurately, the force could reconsider whether a FIM is still needed at times of very low demand.
3. By April 2023, the chief constable of the IOMC and the DHA should develop robust governance and oversight arrangements for the ESJCR that include regular quality assurance of calls and computer-aided dispatch system entries.
4. By October 2023, the DHA should consider introducing a single non-emergency phone number routed to the ESJCR.

Initial response to vulnerable victims

5. By October 2023, the chief constable of the IOMC should increase first responders' capabilities to respond to incidents involving vulnerable victims. This should include:
 - providing officers with regular refresher training;
 - developing clear policies and procedures, and providing officers with clear step-by-step guidance; and
 - improving supervision of first responders' actions across the constabulary.

Initial safeguarding

6. With immediate effect, the chief constable of the IOMC should make sure that sergeants oversee all medium and high-risk domestic abuse incidents and direct safeguarding activities where appropriate.

Investigations of incidents involving vulnerable people

7. By April 2023, the chief constable of the IOMC should develop processes to make sure that:
 - in all investigations, officers produce structured investigation plans that include recorded rationale for decisions or details of why some lines of enquiry were prioritised over others; and
 - sergeants regularly review plans and effectively supervise and review investigations.

Responding to serious and organised crime

8. By October 2023, the chief constable of the IOMC should recommence sending detectives and detective sergeants on the College of Policing's crime and leadership training courses.

Separation of powers and responsibilities

9. By April 2023, the DHA and the chief constable of the IOMC should consider amending the protocol setting out the relationship between the two organisations to explicitly outline the operational independence of the IOMC.

External scrutiny and oversight

10. By April 2023, the DHA should:
 - set up a public engagement strategy that feeds into the annual policing plan and priorities; and
 - re-establish a police consultative forum, or similar body, with clear aims and terms of reference.
11. By April 2023, the DHA should start regularly scrutinising the constabulary's use of operational powers such as stop and search, use of force, and police bail.
12. By October 2023, the DHA should start conducting police performance meetings in public.

Complaints

13. By October 2023, the DHA should create an independent police complaints investigation process.
14. By April 2023, the Isle of Man Government should consider amending current legislation to allow the chief constable to self-refer matters to the PCC.
15. By April 2023, the Isle of Man Government should consider amending regulations to allow the DHA or PCC to conduct an initial assessment of complaints where allegations are made of misconduct by the chief constable and senior officers.

16. By April 2023, the Isle of Man Government should consider amending regulations to give clearer guidance on how people can escalate an informal complaint to a formal complaint when the complainant doesn't accept the constabulary's informal resolution.
17. By April 2023, the Isle of Man Government should consider amending regulations to give the PCC power to issue statutory guidance to the IOMC about investigating complaints.

Annex B – Areas for improvement

Understanding the nature and scale of vulnerability

1. The chief constable of the IOMC should increase the constabulary's analytical capacity and capability.

First contact

2. The manager of the ESJCR should make sure that control room operators receive enough training for police calls. This should include training on how to give crime prevention advice to victims and how to prevent re-traumatisation.
3. The chief constable of the IOMC should introduce oversight and governance procedures to make sure that the emergency services joint control room:
 - conducts thorough THRIVE assessments for all calls; and
 - records these on the computer-aided dispatch system.

Initial response to vulnerable victims

4. The manager of the ESJCR should improve the quality of information that operators give attending officers.
5. The chief constable of the IOMC should make sure that officers completing DASH forms record their rationale. The constabulary should also revise its business rules to instruct officers attending the scene of a domestic abuse incident to complete DASH forms in full at the scene.
6. The chief constable of the IOMC should make sure that attending officers complete DASH forms for all domestic abuse incidents they attend.
7. The chief constable of the IOMC should introduce a process for identifying and assessing the vulnerability of victims, witnesses and suspects in a more consistent way.
8. The chief constable of the IOMC should produce clearer, non-contradictory guidance on when officers should submit MARFs.

Initial safeguarding

9. The chief constable of the IOMC should improve guidance on referrals of vulnerable people to third-sector organisations and develop processes to make sure that such referrals take place where appropriate.
10. The chief constable of the IOMC should produce clear guidance on when officers should use body-worn video cameras.

Missing people

11. The chief constable of the IOMC should update the missing persons form to include a criminal exploitation risk assessment.

Managing offenders and suspects

12. The chief constable of the IOMC should make sure that it vets officers managing sex offenders before they take up post, and re-vet them at least every three years.
13. The chief constable of the IOMC should make sure that supervisors and managers of specialist officers, rather than neighbourhood officers, carry out and record risk assessments for home visits to offenders.

Responding to serious and organised crime

14. The chief constable of the IOMC should develop a 4Ps approach to tackling SOC.
15. The chief constable of the IOMC should develop a means of assessing disruptions with the North West ROCU.

Preventing serious and organised crime

16. The DHA should consider whether ancillary orders such as serious crime prevention orders would help prevent SOC.

External scrutiny and oversight

17. The DHA should consider re-establishing the police advisory group.

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