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Comisynydd Heddlu a Throseddu Gwent | Police and Crime Commissioner for Gwent: Jane Mudd

The Right Honourable Shabana Mahmood
Home Secretary
Home Office
2 Marsham Street
LONDON
SW1P 4DF

20th January 2026

Dear Home Secretary,

Joint inspection on the effectiveness of diverting children from the criminal justice system: meeting needs, ensuring safety, and preventing reoffending.

As required by statute, I am writing to you to respond to the inspection report from His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) and His Majesty's Inspectorate of Probation entitled 'The effectiveness of diverting children from the criminal justice system: meeting needs, ensuring safety, and preventing reoffending', published on 15th October 2025.

I welcome the findings in the report and the opportunity to reflect the current position in Gwent and the work that has been undertaken in relation to this matter. The recommendations provided in the report will allow us to further enhance and improve the effectiveness of the opportunities available locally and support our wider partnership work in Wales. This is reflected by the Chief Constable in his comments:

I welcome this inspection report from His Majesty's Inspectorate of Probation and His Majesty's Inspectorate of Constabulary and Fire & Rescue Services, which examines the use of youth out-of-court disposals. The report highlights the clear commitment of agencies to avoid the unnecessary criminalisation of children.

However, as the report emphasises, there is a difference in approach regarding how youth out-of-court disposals are applied across different areas and the highlights the need for robust governance and oversight to bring about a most consistent approach. The recommendation made in the report for Chief Constables has been shared with our Head of Investigations and Victims to implement.

Rydym yn croesawu gohebiaeth yn y Gymraeg, a phan ddaw i law, byddwn yn ateb yn y Gymraeg – ni fydd hyn yn gohirio ein hymateb. Os hoffech dderbyn gohebiaeth yn y Gymraeg o hyn ymlaen, neu os ydych wedi cael eich gwahoddi gyfweliad neu gyfarfod ac yr hoffech ddefnyddio'r Gymraeg, anfonwch e-bost at: Commissioner@gwent.police.uk. Darperir gwasanaethau cyfieithu.

We welcome correspondence in Welsh and where received, we will reply in Welsh - this will not delay our response. If you wish to receive correspondence in Welsh hereafter or if you have been invited to an interview or meeting and you wish to use Welsh, send email to: Commissioner@gwent.police.uk. Translation services will be provided.

Gwent Police has provided the following response to the recommendation.

Recommendation 11 - Chief constables should: improve how out-of-court disposals are managed by:

- **Working with youth justice services (YJSs) to establish formal data-sharing arrangements to ensure timely and consistent access to information on all types of out-of-court disposal**
- **Ensuring decisions about the use of crime Outcomes 20 and 21 are consistent and appropriate and reflect revised NPCC guidance**
- **Ensuring that police always use the NPCC child gravity matrix guidance when making decisions relating to outcomes for children and that the rationales for those decisions are always recorded.**
- **Ensuring that joint decisions with the youth justice service about out-of-court disposals are made at the appropriate level of seniority.**
- **Ensuring that children's legal rights are met before issuing a community resolution; this includes the need to caution and make sure that an appropriate adult is present**
- **Ensuring that safeguarding referrals are made when appropriate.**

Gwent Police have implemented comprehensive measures to improve the management of out-of-court disposals for children, focusing on data sharing, consistent application of outcomes, safeguarding, and upholding legal rights.

The force has formalised data-sharing agreements with all Youth Offending Services (YOSs) in the force area. Police Youth Offending Team (YOT) officers are co-located with YOSs, enabling real-time information exchange. Monthly datasets on out-of-court resolutions (OoCRs) for children are shared and reviewed for trends and improvement. Work is ongoing to report on reoffending rates for children who receive OoCRs.

Outcome 22 (where a diversionary action has been used to result a case that does not meet the public interest case) is prioritised for young people, allowing further action if diversionary interventions fail. Outcomes 20 (action by another body) and 21 (not in public interest) are used where justified by the circumstances of each case, but once applied, cases cannot be revisited. The Data Audit Team reviews these outcomes for consistency and proportionality. There is recognition of the need for improved guidance and consistency, with a recommendation for national guidance development.

Gwent Police operate under a 'Child First' principle, focusing on early intervention, restorative justice and multi-agency collaboration. The Child Gravity Matrix is used to assess eligibility for OoCRs, with clear criteria (age, offence type, sufficient evidence, admission of offence, willingness to engage, appropriateness, parental/appropriate adult involvement, victim involvement, and no ongoing prosecution). Decisions are documented with clear rationale.

A quarterly OoCR Scrutiny Panel reviews a sample of cases for fairness and consistency. The panel includes representation from the YOS, police, and the Office of the Police and Crime Commissioner, providing robust oversight and promoting transparency throughout the scrutiny process.

Final decisions on OoCDs for children are made by a YOS Supervisor or Police Sergeant. Complex cases are referred to a Diversion Outcome Panel (DOP) for multi-agency review. The panel considers the best interests of the child, the victim, and the community, ensuring that decisions are proportionate, evidence-based, and made at an appropriate level of

seniority.

Robust processes ensure children's rights are protected before issuing community resolutions. All children in custody are provided with a solicitor and an Appropriate Adult (AA). Enhanced support for AAs includes accessible information and training. Juveniles are processed in a designated suite, with prioritisation for timely handling. Voluntary attendance processes are being improved for consistency.

All custody and YOS staff are trained in Adverse Childhood Experiences (ACEs) and child exploitation awareness. In addition, staff within the YOS have also undertaken further training in trauma-informed practice, ensuring they are equipped to recognise and respond effectively to the complex needs of vulnerable children. Upon booking into custody, every child is seen by a Health Care Professional, and safeguarding referrals are made as standard. Public Protection Notices (PPNs) are submitted for any safeguarding concerns and reviewed by Multi-Agency Safeguarding Hubs (MASH). Hubs are established within each local authority area in Gwent. Within these hubs, the force has co-located decision-making officers who actively participate in regular strategy discussions and meetings. This collaborative approach enables the early identification of vulnerability indicators—such as school exclusion, episodes of children going missing, or associations with known offenders—facilitating prompt intervention and effective harm reduction.

As the Police and Crime Commissioner, I am committed to ensuring that the 'Child First' principles are applied across all policing activity and decision-making. My Police, Crime and Justice Plan 2025 – 2029 seeks to enhance how we engage with and support children who are at risk of offending and, when this occurs, are provided with effective diversionary offers and support ([police-crime-plan-2025-final-small.pdf](#)). This includes investing in pre-court diversion services that can help to educate, rehabilitate and reintegrate individuals to reduce further offending.

In November 2025, I launched my Children and Young People's Charter, which was a key commitment in my Plan. The Charter is guided by the UN Conventions on the Rights of the Child and sets out how I will ensure that children and young people are heard and that their rights are championed within the criminal justice system ([Commissioner launches Children and Young People's Charter | Gwent Police and Crime Commissioner](#)).

My Plan also sets out how I will use my role as Chair of the Local Criminal Justice Board to ensure the justice system focuses on reducing reoffending and ensuring partners hold each other to account for the delivery of our shared commitments to improving criminal justice outcomes. The Board retains a specific commitment to youth justice, with children and young people providing one of the central elements of our Justice Strategy 2025 – 2029. The three YOSs in Gwent are members of both the Strategic Board and the Reducing Reoffending Subgroup. This ensures opportunities for shared learning and engagement with youth justice processes, including ratification of policies and processes such as the Gwent Children's Out of Court Disposal Framework 2025 (which my office was involved in reviewing), and consideration of any recommendations within thematic reports. Following a reset in May 2025, the Board has implemented a new delivery plan and performance framework, with the Reducing Reoffending Subgroup developing a set of measures and indicators that will be informed by data for OoCR. Youth justice information is a key component of the performance framework.

My office continues to maintain the Independent Custody Visiting (ICV) Scheme for Gwent. The scheme prioritises visits for children in custody and checks that rights and entitlements have been afforded to detainees, including the provision of AAs, along with the conditions of

the custody suite. This helps to ensure that the appropriate safeguarding measures are taken whenever a child is in custody, and that any issues or concerns are recorded and escalated to the appropriate supervisor for review and action ([Independent Custody Visitors | Gwent Police and Crime Commissioner](#)).

My office is also involved in the wider OoCR partnership work under the Welsh Government's Youth Justice Blueprint. The Deputy PCC is a member of the Youth Justice Programme Board and has been co-leading the Pre-Court Diversion and OoCR Workstream. My office came together with partners in February 2025 to review and prioritise recommendations resulting from commissioned work to develop Principles and Guidelines for Wales. These Principles and Guidelines intend to inform practice by addressing key issues to ensure that children across Wales are treated equitably, irrespective of which policing area or YJS is engaged with them. Following the workshop, an overarching action plan was produced, which has been adopted and localised by each force area. This work is being led in force by the Head of Investigations and Victims with oversight provided by the Deputy PCC.

I will continue to hold the Chief Constable to account for Gwent Police's management of OoCR and effective partnership working to ensure that children receive appropriate and consistent outcomes. My office will continue to support and deliver the schemes and activities outlined, working with relevant partners to drive improvements where appropriate.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Mudd', written in a cursive style.

Jane Mudd
Police and Crime Commissioner for Gwent