

## CONSULTATION RESPONSE

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| <b>TO</b>        | <b>Department for Education</b>                     |
| <b>FROM</b>      | <b>Independent Office for Police Conduct (IOPC)</b> |
| <b>REGARDING</b> | <b>Child Protection Authority (CPA)</b>             |

### Our interest in this matter

1. The IOPC oversees the police complaints system in England and Wales and has a statutory duty to secure and maintain public confidence in it. We are not part of the police or Government and make all our decisions independently of them. The IOPC investigates the most serious and sensitive complaints and incidents involving the police and sets the standards by which the police should handle complaints. We consider certain applications for review of police handling of a complaint from people who are unhappy with the outcome of their complaint or the way it has been handled. The IOPC also has a broader role in sharing learning to help the police service develop and improve.
2. The IOPC carries out investigations into some circumstances relating to potential failings in relation to child protection and safeguarding. Our work involves looking at the actions of police officers and staff and whether they are in line with what would be expected of them. Our investigations and reviews may lead to misconduct, performance or criminal outcomes for individuals. They may also identify wider concerns for the individual police force or for national practice leading to us issuing learning recommendations as described below.
3. The cases we see generally involve one or more of the following concerns: possible failures by the police to investigate child sexual abuse or to safeguard vulnerable individuals; allegations that a police officer or member of police staff has committed child sexual abuse; and situations where a person under investigation for child sexual abuse has died by suicide.
4. The IOPC's statutory remit centres on policing. By contrast, the proposed Child Protection Authority (CPA) would hold a broader, systemwide responsibility for child protection, learning standards, and prevention. There is, therefore, potential for overlap in our responsibilities.

## **Response to consultation**

5. As this response is focused on the potential overlap between the IOPC and CPA, rather than responding to each question individually, we have focused on the areas where the IOPC's experience and insight can most effectively add value to the consultation.

### *The Child Protection Authority*

6. The IOPC welcomes the proposal to establish a Child Protection Authority (CPA), in light of the systemic issues, including those identified in the Casey audit.

### *Overlapping oversight*

7. We would urge that work to create a Child Protection Authority considers other pre-existing oversight mechanisms. It will be important to ensure that the CPA's governance arrangements, powers, and leadership structures are clearly defined, and that appropriate distinctions are maintained between the CPA's preventative and learning functions and the IOPC's existing statutory responsibilities. For example, it will be important to have safeguards to avoid risk of prejudice to criminal investigations and proceedings. The IOPC is accustomed to working alongside other agencies with parallel investigations and inquiries such as coroners' inquests and police criminal investigations so we are confident this can be managed.

### *Learning and improvement*

8. The IOPC has statutory powers to issue learning recommendations to police forces (one or a number) or police and crime commissioners. We can also, in certain circumstances, make recommendations for other organisations that are relevant to the investigation or review. These powers are set out in the Police Reform Act 2002 and allow the IOPC to influence improvements in policing practice, policy and training. Learning recommendations can be made before or after an investigation has concluded and the recipient must provide a written response within 56 days explaining: what action they will take, or why they will not take action. Both the recommendation and the response must be published. An example of the type of learning we may issue is our learning report in relation to [Operation Linden](#) (our investigation into South Yorkshire Police's handling of non-recent child sexual abuse and exploitation in Rotherham).
9. Establishing the CPA presents an opportunity to promote cross-organisational learning: the IOPC identifying policing failures and issuing learning through our investigations, and the CPA drawing on that learning to support broader system level improvement. This will ensure that insights emerging from IOPC investigations can inform, and be integrated within, national learning framework-level improvement.

*Further engagement*

10. The IOPC would welcome continued engagement and any further opportunities to support the development and establishment of the Child Protection Authority.

**IOPC**

**February 2026**

## Annex A – The IOPC and its remit

1. The IOPC, formerly the IPCC (Independent Police Complaints Commission), came into existence in January 2018. The IPCC came into existence in April 2004.
2. The IOPC oversees the police complaints system in England and Wales and has a statutory duty to secure and maintain public confidence in it. We are independent, and make decisions independently of the police, government, and interest groups. We investigate the most serious complaints and incidents involving the police across England and Wales, as well as considering certain applications to review police handling of a complaint from people who are not satisfied with the way police have dealt with their complaint.
3. Over time our original remit covering police forces across England and Wales has been extended to include:
  - Police and Crime Commissioners and their deputies
  - the London Mayor's Office for Policing and Crime and his deputy
  - certain specialist police forces (including the British Transport Police and the Ministry of Defence Police)
  - Her Majesty's Revenue and Customs (HMRC)
  - staff who carry out certain border and immigration functions who work within the UK Border Force and the Home Office
  - the National Crime Agency (NCA)
  - officers carrying out certain functions at the Gangmasters and Labour Abuse Authority (GLAA)
  - Food Crime Officers at the Food Standards Agency (FSA) when carrying out certain functions
4. The majority of complaints against the police are dealt with by the relevant police force (or agency) without IOPC involvement. However, certain types of complaints and incidents must be referred by the police to the IOPC. These include where someone has died or been seriously injured following direct or indirect contact with police, as well as allegations of serious corruption, serious assault, and a criminal offence or behaviour liable to lead to misconduct proceedings which in either case is aggravated by discrimination on specified grounds. We then decide whether an investigation is necessary, and, if so, what level of involvement we should have in that investigation. We may choose to conduct our own independent investigation, direct a police investigation, or decide that the matter can be dealt with locally by the police.