

Appendix A – LGA response to the Government’s consultation on taking a multi-agency approach to tackling and preventing serious violent crime

28 May 2019

About the Local Government Association (LGA)

1.1 The Local Government Association (LGA) is the national voice of local government. We work with councils to support, promote and improve local government. We are a politically-led, cross party organisation which works on behalf of councils to ensure local government has a strong, credible voice with national government. We aim to influence and set the political agenda on the issues that matter to councils so they are able to deliver local solutions to national problems. The LGA covers every part of England and Wales, supporting local government as the most efficient and accountable part of the public sector.

2. Key messages

2.1 Tackling serious violent crime is a key priority for councils. This has become even more vital due to the rising levels of this type of crime and the harm it causes to victims and communities, as well as the young people and vulnerable adults drawn and exploited into committing it.

2.2 Law enforcement and criminal justice measures are only part of the response needed to tackle serious violent crime. A multi-agency partnership approach is required, working across Government departments and all agencies, including local government, health, education, social services, charities, youth services and practitioners.

2.3 We support the World Health Organization’s (WHO) definition of taking a public health approach to reducing violent crime. This approach aims to consider the underlying causes of the issue, and identify risk factors which can then be addressed.

2.4 By identifying the early indicators and risk factors of serious violence, this can help key agencies to implement the right interventions and divert individuals away from violent crime. This requires a greater investment in early intervention and prevention initiatives.

2.5 Councils need sustainable, long-term funding commitments to ensure that they can develop programmes that will consistently protect and care for our communities, particularly those that are vulnerable.

2.6 Whilst new Government funds to address serious violence are welcome, this should not replace the core funding required to support integral local government services.

2.7 Councils are currently face a funding gap of £8 billion by 2025, of which £3.1 billion is attributed to children's services. We have called for this funding gap to urgently be addressed in the Government's upcoming Spending Review.

3. LGA position

3.1 The LGA supports a voluntary non-legislative approach (outlined in Option Three of the Government's consultation) to tackle serious violent crime. We support a non-legislative approach for the following reasons:

Serious violence

3.2 Different areas will experience different types and levels of serious violent crime. For many areas, the most common type of serious violence could be domestic abuse or alcohol fuelled violence.

3.3 Local areas need to have flexibility to tackle the types of serious violence they face, which will change from locality to locality and over time. A one-size-fits-all approach will not be effective and forcing local partners down one route risks disrupting existing successful partnerships.

3.4 The proposed statutory duty focuses specifically on preventing and tackling serious violence within the scope of the Government's Serious Violence Strategy. The Strategy focuses on serious violence in public places, specifically homicide, knife crime, gun crime and wider criminality such as county lines drug dealing.

3.5 The Strategy does not seek to address other forms of serious violence, such as domestic abuse or modern slavery, as there are separate Government strategies for these forms of crime.

3.6 Whilst the Strategy suggests that domestic abuse and alcohol are not driving the increases in violent crime, they are still forms of serious violence which councils and their partners would seek to address locally. For example, London's Violence Reduction Unit seeks to tackle wider forms of serious violence, including domestic abuse.

3.7 The proposed statutory duty is, in our view, inflexible.

Multi-agency working

3.8 Councils recognise that working in multi-agency partnership and taking a public health approach to tackling this important issue is the best way of moving forward. As local leaders, councils play a key role in reducing re-offending and tackling crime and disorder, bringing together partners through their strategic and operational role spanning enforcement, early intervention, prevention in relation to youth offending and the provision of support to victims of violence.

3.9 It is important to note there is a considerable amount of multi-agency work already underway in local areas, for example to tackle child sexual exploitation or modern slavery. Councils have been working hard to develop strong local partnerships with the police, social care, safeguarding teams, schools, health services and the voluntary sector to tackle serious violent crime.

- 3.10 For example in Southend, community safety, education, safeguarding and health partners have come together to address violence and vulnerability in the locality. There is a joint mission to tackle county lines and serious violence, which all partners have prioritised. They have set up the necessary data/information sharing arrangements and are able to take key actions forward.
- 3.11 Our LGA report '[Breaking the Cycle of Youth Violence](#)' highlights some other good examples of local authorities taking the lead on this important issue.
- 3.12 There are also partnerships which are addressing serious violence at a regional level. London's Violence Reduction Unit and West Midlands' Violence Prevention Partnership are good examples of partnership arrangements which are taking a multi-agency, public health approach to tackling serious violence.
- 3.13 The aim of London's Violence Reduction Unit is to provide London with greater capacity, expertise and coordination to identify the major causes of violence and deliver early interventions to help prevent the spread of violence. The Unit recognises that traumatic experiences in childhood (sometimes referred to as Adverse Childhood Experiences, or ACEs), are more common in people that commit violence later in life. By addressing these risk factors, it is possible to prevent or reduce the likelihood of violent incidents in the future.
- 3.14 Building on the success of these partnership arrangements, and the Glasgow model, the Government has allocated approximately £35 million to support the setting up of new Violence Reduction Units (VRUs). These VRUs are expected to take a multi-agency approach bringing together police, health agencies, local government, youth offending services and community representatives to tackle violent crime and its underlying causes.
- 3.15 We think these new VRUs should be piloted over a longer time period to evaluate their success. If this partnership model is successful locally, it could be rolled out more widely. Therefore, we would recommend this voluntary approach is piloted and evaluated to help identify whether a new statutory duty would be necessary.

Public health approach

- 3.16 We support the World Health Organization's (WHO) definition of taking a public health approach to reducing violent crime. This approach aims to consider the underlying causes of the issue within a community, identify risk factors, and then take action to reduce incidents.
- 3.17 Taking a public health approach requires a culture change across all public services, which must be led by a cultural shift across Government departments. For example, the Government's upcoming Prevention Green Paper could help to set the direction for health partners to focus on tackling serious violence. The Government has an important role to play in setting the priorities and incentives for addressing key issues locally. There needs to be strategic direction nationally, so this approach can become embedded in the day-to-day running of services locally.

- 3.18 Shifting the focus to early intervention and prevention takes time. There won't be quick or immediate results. This will require a commitment from all the relevant Departments that they will jointly fund and jointly support this approach. There needs to be co-ordinated action across health, education, housing, criminal justice and the police.
- 3.19 Therefore, we would argue that it is more important for local partners to develop a public health mind-set to dealing with serious violence than specifying which vehicle should be used to deliver that mind-set.
- 3.20 This approach would be more amenable to guidance and demonstrating good practice rather than introducing a new statutory duty.

4. Current legislation

- 4.1 Councils have worked with multi-agency partners to address local crime and disorder issues for many years. Community safety and safeguarding legislation already places responsibilities on local authorities and their partners to tackle violent crime and protect children, young people and vulnerable adults.

Community Safety Partnerships

- 4.2 Community Safety Partnerships (CSPs) already have a statutory duty, under the Crime and Disorder Act 1998, to work together to reduce re-offending; tackle crime and disorder; tackle anti-social behaviour; tackle alcohol and substance misuse; and tackle any behaviour which has a negative impact on the local environment.
- 4.3 There are also statutory requirements for CSPs regarding sharing information and engaging and consulting with the community about their priorities, and monitoring progress in achieving them.
- 4.4 Statutory guidance would be useful to strengthen these existing partnerships and responsibilities, rather than creating a new legal duty.
- 4.5 It would be useful if the guidance considered health partner engagement in CSPs, which has varied in some areas. CSP membership could also be amended to include education establishments, to ensure there is full engagement with academies and free schools.
- 4.6 Whilst CSPs are important partnership arrangements to tackling serious violent crime, it is important to acknowledge their funding has been substantially reduced since 2010. CSPs require long-term, sustainable funding if they are going to be successful in helping to tackle serious violent crime locally.

Safeguarding

- 4.7 Councils, health and police partners also have a duty to work together on child safeguarding through multi-agency safeguarding arrangements, which this year took over from local safeguarding children boards (LSCBs). An additional legal duty on children safeguarding teams would place additional burdens on an

overstretched workforce. There is no evidence that an additional legal duty on children's social care teams would improve outcomes.

4.8 As outlined in the Working Together to Safeguard Children statutory guidance:

4.9 *Under section 10 of the same Act, the local authority is under a duty to make arrangements to promote co-operation between itself and organisations and agencies to improve the wellbeing of local children (see chapter 1). This co-operation should exist and be effective at all levels of an organisation, from strategic level through to operational delivery.*

4.10 As with CSPs, LSCBs in many areas have been underfunded, with councils making up the largest proportion of the budget. Early adopters of the new multi-agency safeguarding arrangements are reporting similar issues. The Government should monitor the implementation of the new arrangements to ensure partnerships are adequately funded, with all partners taking equal responsibility, to safeguard children, including those who may become vulnerable to criminal exploitation or gang involvement.

4.11 We continue to have concerns about the role of education settings in multi-agency safeguarding arrangements, and would urge the Government to consider options to ensure all schools play their part in protecting local children as part of a wider multi-agency approach.

5. New legal duty

5.1 The consultation outlines the Government's preferred option is to introduce a new duty on specific organisations to have due regard to the prevention and tackling of serious violence. Whilst we support a non-statutory voluntary approach, it is important to highlight the following points if the Government takes forward a legal duty:

5.1.1 Local areas need the flexibility to address the types of crime they face locally. Local partners are best placed to identify the priorities and needs of their residents and their local community. This needs to be reflected in the statutory guidance.

5.1.2 The legal duty must not be too London-centric, it needs to take into account how all local areas will work towards tackling violent crime. Different tiers of local authorities will have different responsibilities, so this will also need to be considered.

5.1.3 There will be new burdens involved with amending partnership arrangements and the costs to different partners may vary. The cost assessment will need to take into account the cost of these structural changes, as well as any new services that will need to be commissioned to tackle serious violent crime. For example, additional youth workers or in-school counselling services.

5.1.4 This new legal duty is being proposed at the same time the Ministry of Housing, Communities and Local Government (MHCLG) is proposing a new legal duty for local authorities to provide domestic abuse accommodation

services. It will be important for these proposals to work together, particularly in light of any changes that will arise through the draft Domestic Abuse Bill.

- 5.1.5 The geographical boundaries, responsibilities and powers of the police, local authorities, safeguarding, health and education partners all differ. It would be useful to review the current community safety landscape to ascertain how arrangements work in practice and where there are challenges that need to be addressed.
- 5.1.6 Local areas need increased analytic capacity to assess the levels and types of serious violent crime in the area and identify the drivers of serious violence. Further research is needed to identify which interventions will be most effective in addressing the risk factors/causes of serious violence. Our report on the [relationship between youth offending and family violence](#) provides further information on some of the risk/protective factors and possible interventions.
- 5.1.7 There are challenges with data-sharing between different agencies, which has been experienced by the various partnership arrangements already in place. It would be useful for the Government to publish statutory guidance to clarify which information can be shared and for what purposes, to provide reassurance to all partners when entering into these partnership arrangements.
- 5.1.8 The accountability structure for the new legal duty must be clear. The new legal duty relies on all partners working together to tackle serious violent crime, however all these agencies have different inspectorates and accountability structures. There must be a joint understanding of how local areas will be held accountable for the duty.
- 5.1.9 Collaboration with health and education partners is key. Early intervention and prevention will begin with health and education-based interventions, so they must be central to the discussions on tackling serious violent crime.
- 5.1.10 The Independent Review of Drug Misuse should inform plans for a new legal duty. As drugs are identified as the driving force for the recent rise in violent crime, it is clear that drug treatment and addiction services will be integral to tackling serious violence.
- 5.1.11 The nature of county lines activity means that local areas will not just have to work in partnership locally but they must also co-ordinate on a regional basis. It would be useful if the National County Lines Co-ordination Centre's remit could be extended to provide training and guidance to other local partners, beyond the police service.

6. Funding

- 6.1 Taking a public health approach to serious violent crime will mean additional funding needs to be directed towards more early intervention and preventative services. Unless the funding gap in local government is addressed, new legislation will be ineffective.

6.2 Councils will have lost 60p out of every £1 the Government had provided to spend on local services in the last 8 years. This has meant councils have had to prioritise spending on statutory services, to the detriment of other public services.

6.3 Local government needs long-term, sustainable funding, if it is going to be successful in helping to tackle serious violent crime. In particular, there needs to be clarity on the future sustainability of key funding streams after 2020, for example the Troubled Families Fund.

Youth offending teams

6.4 Youth offending teams (YOTs) have achieved huge success in working with and supporting young people to prevent them getting involved in youth crime, with an 86 per cent drop in First Time Entrants to the youth justice system and a 78 per cent drop in arrests over the last decade. The number of youth cautions handed out dropped by more than 100,000, or 91 per cent, in the same period.

6.5 However, the overall size of the grant, which funds the vital work of YOTs within councils, has already been halved from £145 million in 2010/11 to £71.5 million in 2018/19, threatening councils' abilities to maintain this success and protect young people and residents.

Children's services

6.6 Faced with significant rises in demand for urgent child protection work and a £3.1 billion funding gap facing children's services by 2025, councils are being forced to divert the limited funding they have left away from preventative work, including family support and youth work, into services to protect children who are at immediate risk of harm. For example, as a result of reductions in government funding, council-funded youth services have seen funding more than halved in real terms since 2010.

6.7 Councils must be given the resources they need to work with young people and prevent their involvement in crime in the first place, rather than simply picking up the pieces after offences have been committed. Early help and early intervention work with children, young people and families can help avoid people reaching crisis point, with the right support at the right time a vital component of a public health approach to tackling serious violence. We are calling for the Government to address this funding gap in the forthcoming Spending Review.

Special Educational Needs and Disabilities

6.8 Demand for support for pupils with SEND has also increased significantly and needs to be funded sustainably going forward. The Children Commissioner's report in February 2019 on '*The characteristics of gang-associated children and young people*' found that 40 per cent of children and young people associated with gangs had an identified SEN, and of those 80 per cent do not have a full statement or education, health and care (EHC) plan.

6.9 Research undertaken by the Isos Partnership on behalf of the LGA has found that councils are facing a high needs funding gap of £806 million for 2019-20, rising to almost £1.2 billion in 2020-21. We are concerned that unless additional funding is

found, councils will be unable to meet their statutory duties to support children with SEND.

6.10 The Timpson Review of School Exclusions found that children and young people with SEND are more likely to be excluded from school, making them vulnerable to exploitation; in addition, the Review found that exclusion was a marker for being at higher risk of being a victim or perpetrator of crime. It is therefore vital that funding is available to ensure children with SEND are given the right support to enable them to remain in education.

Child and Adolescent Mental Health Services

6.11 Today, we know that at least one in eight children and young people are affected by mental health problems. Despite this, lack of funding is leaving service thresholds so high that around 75 per cent of young people experiencing a mental health problem are unable to access any treatment.

6.12 In our [Bright Futures](#) campaign, we have called on the Government to ensure care pathways and services are quickly accessible and appropriate for all, including those with complex needs. The Government has promised £1.7 billion for children's mental health, and it should be certain all of this is received by children's mental health services, and not diverted elsewhere.

Public health

6.13 Whilst public health services have an important role to play in tackling serious violence, such as through the delivery of drug and alcohol cessation services, it is important to note that councils' public health grant funding is being cut by £700 million between 2015/16 and 2019/2020. This is why we are calling on the Government to reverse these cuts in the forthcoming Spending Review to enable councils to deliver vital public health services and early intervention and prevention services.

7. Serious Violence Taskforce

7.1 As members of the Serious Violence Taskforce, the LGA will continue to work with the Government, the police, health and education agencies, the voluntary sector, as well as local partners and agencies to take forward the commitments outlined in the Serious Violence Strategy and work towards combatting serious violence. We will continue to share best practice and learning across local government on this important issue