

Briefing for Report Stage of the Victims and Prisoners Bill

November 2023





The Children's Commissioner, Dame Rachel de Souza, promotes and protects the rights of children, and stands up for their views and interests. The role was established under the Children Act 2004 following the tragic death of eight-year-old Victoria Climbié, one of the starkest safeguarding failures our country has seen. Lord Laming's inquiry into the failings which led to Victoria's death called for the creation of a national-level advocate that could independently promote the rights of the child, and push for decision-makers to always be led by children's best interests.

The Children's Commissioner strongly welcomes the *Victims and Prisoners Bill*, which is a critical opportunity to strengthen children's rights to safety and justice. Child victims are among the most vulnerable – too often excluded from a justice process designed with adults in mind, and overlooked when it comes to specialist support to recover. While it is the ultimate ambition of the Commissioner to prevent any child from becoming a victim of crime, since we are sadly still far from this reality, it is critical that this Bill paves the way for a transformation in our response to child victims - ensuring children get what they need to heal and thrive after harm.

The Children's Commissioner welcomes that children born as a result of rape and other criminal conduct are included within the definition of a victim, as well as child victims of domestic abuse. The Commissioner is also supportive of the Government's announcement that it will introduce Jade's Law, which would mean parents who kill a partner or ex-partner with whom they have children will automatically have their parental responsibility suspended upon sentencing. This is essential for protecting some of the most vulnerable child victims.

While these are important strides forward, there are still a number of key changes needed to truly transform the response to child victims. The Children's Commissioner's office (CCo) is currently working with incredibly brave child victims and survivors of sexual harm, to understand their experiences of accessing support services and navigating the complex justice system. Their voices are included in this briefing, which outlines the Children's Commissioner's priority asks to ensure the *Victims and Prisoners Bill* delivers for child victims, informed by what children say they want and need.

The Commissioner would like to see developments around five key areas:

- **1. Voice –** An **advocate** for every child victim of the most serious crimes.
- 2. Choice Children have agency when engaging with the CJS, including around Victim Information Requests and the Independent Public Advocate (IPA) role.
- **3. Rights** A **Victims Code of Practice (VCOP)** designed with and for children, with clear accountability for ensuring children receive:
 - a. A mandatory, multi-agency **needs assessment** at the earliest opportunity after a crime involving a child victim is reported.



- b. **Positive interactions** with the police which are sensitive to children's trauma, including before, during, and after interviews.
- c. Timely decisions, communication and updates on their case.
- d. **Support to heal after harm**, regardless of the criminal justice outcome.
- 4. **Recognition A definition of 'victim' which recognises all child victims,** including those subject to Child Criminal Exploitation (CCE), and children who choose not to report an offence through the justice system.
- **5. Holistic support** A national network of **Child Houses** which provide joined up care to child victims.

Background - Levels of need

Children are disproportionately victims and survivors of the most serious crimes, yet this is often obscured in national data which tends to report on crime trends for those aged 16 and above, and therefore not reflected in the way services are designed and commissioned. Much of the abuse and violence children experience is invisible, with national statistics only the tip of the iceberg:

- **Sexual violence:** 1 in 6 girls and 1 in 20 boys experience child sexual abuse before the age of 16.¹ Across all age groups, the majority of victims of sexual offences are under the age of 20.²
- **Domestic abuse:** Children and young people experience domestic abuse in both their families and their own relationships. The Children's Commissioner estimates that 1 in 15 children under the age of 17 live in abusive households.³ Young people aged 16-24 also experience the highest rates of domestic abuse in their own intimate relationships.⁴ Data for children experiencing abuse in their own relationships under the age of 16 is not collected or legally recognised as 'domestic abuse', meaning this abuse is poorly understood, and rarely identified and responded to.
- **Serious violence:** Nealy half (44%) of potential victims of modern slavery referred to the National Referral Mechanism are under the age of 18.⁵ Child Criminal Exploitation (CCE) is the most common referral reason (39%).

1) Voice - An advocate for every child victim of the most serious crimes

Within social care, mental health or youth justice services, children's need for advocacy is recognised – albeit, not always upheld. A child in care, a child living in a mental health setting, and a child in custody all have the right to request an advocate. There is an appreciation that children need free, independent and confidential advocacy in order to navigate complex systems designed by and for adults. Yet this same recognition is not extended to child victims of the most serious crimes, despite them being no better equipped to understand complicated legal processes, and despite them very often being extremely traumatised from what they have experienced.



There are pockets of good practice, for example Child Independent Sexual Violence Advisers (**Chlsvas**), Child Independent Domestic Violence Advisers (**Chldvas**), Young People's Violence Advisers (**Ypvas**) and Independent Child Trafficking Guardians (**ICTGs**), who are not only able to work with children to help them understand the criminal justice process, but often also act as a vital point of contact with criminal justice agencies, and provide much-needed emotional and wellbeing support. The few children who are able to access this kind of advocacy, often much further along in their journey than they would have liked, talk about how transformative this support was for their experience of the criminal justice process and long-term recovery.

'[My Chisva] - she's brilliant. Like she's so good. She's exactly what I would have needed in those earlier things.

Like she's exactly who I'd want to come in with me for that interview, who I'd want to come like meet the person with - and I didn't get offered her' – Girl, 15, victim of peer-on-peer sexual assault (March 2023).

'[My Chlsva] was great. She was on it straight away as soon I got referred. She met with me very soon after I got referred, probably within a month...She was meeting with me [regularly] because they couldn't get me into the therapy service yet...She was great. She was always pushing for updates and just checking if I'm OK overall...My advocate showed me that it wouldn't be so bad'

-Girl, 17, victim of peer-on-peer sexual abuse (October 2023).

'It was a therapeutic relationship [with my Chlsva]...more beneficial than the therapy I had. I remember talking with her when I was really down, because I was almost grieving for myself – I really felt like I had lost who I was... I would have never thought I'd be like where I am now'

— Girl, 15, victim of peer-on-peer sexual assault (March 2023).

Despite the value of these services, **currently provision of support is patchy.** This is true for both children and adults, however, because of the ways services are commissioned, children are even less likely to access appropriate advocacy. Two key problems exist:

- The specialism required to work with children is not sufficiently recognised or invested in, despite this being well-understood in other services, such as social work and education. Advocates working with children should receive distinct, specialist training and qualifications in the dynamics of children's experiences of sexual harm and abuse; age-appropriate language for talking about harms; methods of communication and engagement, including for pre- and non-verbal children; approach to risk assessment and safety planning including safeguarding processes, referral pathways, and multi-agency relationships such as how to work with schools. The support offer an advocate provides will look very different depending on the victim's age.
- Where advocacy services do exist, often children are not eligible to access them. Even older teenagers struggle to access support from adult advocacy services, including many Idvas or Isvas, because of their age. Data from SafeLives shows that in 2022, only 1% of clients accessing Independent Domestic Violence Adviser



(Idva) services (which should include 16- and 17-year-olds) were under the age of 18, despite the high prevalence of domestic abuse in this age group.⁶

What is needed: The *Victims and Prisoners Bill* should mandate that every child victim of the most serious crimes be offered a specialist advocate - bringing child victims' rights in line with their entitlements in other systems, such as social care, mental health and youth justice. This advocate must have the training and qualifications needed to work with vulnerable children. As well as specialism in the specific harm children have experienced, these advocates should also have the skillset of a Registered Intermediary, to ensure language and communication is appropriate to the child's development level.

2) Choice - Children have agency when engaging with the CJS

Children who have survived the most serious crimes must have agency when engaging with the criminal justice system. Too often, children speak about being re-victimised by a process which does not meaningfully consult or engage them. As well as access to advocacy, children should be asked how they want to communicate with professionals. For some children, direct communication may be most appropriate. For other children, it may be more appropriate to have a representative such as a parent or an advocate - but this should not preclude giving children choice over who is best placed for this role.

'If I could change something it would be more communication with me because I think, personally, I would like that communication. I think going through my parents is good, but it's not the best way to get information to me' – Girl, 15, victim of child sexual abuse (October 2023)

'I feel like [the police] spoke to my mum a bit, like, more than me, they didn't really address me...

I would like to be more involved, especially with like the therapy stuff...

older teenagers, especially if they're like 15/16...they should have the option.'

– Girl, 18, victim of peer-on-peer sexual assault (September 2023)

Currently in the *Victims and Prisoners Bill*, any child who is under 18 will automatically forfeit their right to be engaged directly with on their case in certain instances, for example receiving direct support from their Independent Public Advocate or being notified about a Victim Information Request, such as for their counselling notes to be shared.⁷ Children already talk about this being the case with other communications regarding their case.

For many older teenagers, this is out of step with how they are treated in the wider legal system. It is vital this legislation strikes a balance between recognising all children under 18 are children – and not adultifying them, while also ensuring the criminal justice process is not disempowering. Older teenagers may be living



independently from their parent or guardian,⁸ and under the Mental Capacity Act, 16- and 17-year-olds are presumed to have capacity – for example to consent to, or refuse, treatment. It is advised that even younger children who are deemed to be 'Gillick competent' are afforded this same right without the need for parental consent.⁹ Achieving Best Evidence guidance states that parental consent for a child to be interviewed by police is only necessary where "the child is not able to understand the implications of participating in the interview." ¹⁰

Most children will have a loving parent or carer who supports their child to make informed choices for themselves. But there will be times when children do not have a parent who can do this, so a proper process - with all the necessary safeguards in place - should be established to allow children to choose who supports them. Where a child does want or need a representative, there is increasing recognition of the importance of giving children choice. The proposed reforms to the Mental Health Act included a move to introduce a Nominated Person (NP) model, which would give children over 16, and children deemed competent, choice over who best represents their interests. Equal consideration should be given to a model of engagement in the criminal justice system which centres the voice of the child - rather than delegating to whoever "the authorised person considers appropriate."

'I felt quite like a bit embarrassed to be honest, cause I was scared [my mum] would hear what I said about my feelings and how I felt because of [the abuse]... I wish the process was maybe a bit more private, as in, like, I was able to be alone' – Girl, 15, victim of child sexual abuse (October 2023).

What is needed:

- Children's eligibility for direct communication with their Independent Public Advocate and from criminal justice agencies making a Victim Information Request should follow legal precedent, which takes into account a child's capacity and competence to take decisions. It should also establish processes for when it may not be appropriate for a parent to receive communication on behalf of their child.
 - The Children's Commissioner to be a statutory consultee on the Victim Information Requests code of practice to ensure children's distinct needs and experiences are taken into account.
- More generally, children should be supported to make safe and informed decisions about how they want to communicate with criminal justice agencies about their case, and clear information about what information will be shared and with who. This includes giving competent children the ability to indicate who they would like to receive communications, including opting for direct communication where this is judged to be safe and appropriate. This process should be consistently embedded as part of a thorough, multi-agency needs assessment of the child at the earliest opportunity.



3) Rights – A Victim's Code of Practice designed with and for children

The Victim's Code of Practice (VCOP) is the primary means through which all victims can access their rights. It is critical that children are not only aware of and able to access and understand their rights in the VCOP, but also that it reflects their distinct needs and experiences, and unique legal status and entitlements.

The Commissioner has spoken with children and young people across the country whose rights are routinely not upheld in the current system. If the VCOP is to be a meaningful recourse for children to access their entitlements, the Children's Commissioner would like to see clear accountability for ensuring children have:

- > A robust, mandatory multi-agency needs assessment at the earliest opportunity after a crime involving a child victim is reported. The current VCOP states that all children and vulnerable witnesses should have their needs assessed, though there is believed to be considerable variation between forces in whether this is happening in practice, and the way it is being carried out. Many of the challenges highlighted in the HMCPSI and HMIC 2014 report into Achieving Best Evidence interviews in child sexual abuse cases still hold true today.¹² The Children's Commissioner is currently investigating this issue further.
- > Positive interactions with the police which are sensitive to children's trauma, including before, during, and after interviews. Despite Achieving Best Evidence (ABE) guidance on how to appropriately interview children and vulnerable witnesses, children and young people have told the Commissioner that this is often a distressing and traumatic experience.

'There was a lot of trying to work out my character in that first meeting... I understand why they have to work out what, you know, 16-year-old me was up to when I first entered that relationship, but it's hard to be asked those questions without feeling like they're trying to blame you'

- Girl, 19, victim of peer-on-peer sexual abuse and domestic abuse (October 2023).

'Between then and my, like, recorded interview and they were saying - again, no one tells you - they were just saying like, 'oh, it's practically like a living room. Like there's tiny cameras, you can't even see them. There's microphones, like, hidden.' You walk in and it's literally just a massive sofa and like a massive - like the size of my head -like ball camera staring at you and then, like, a microphone on that side, and a microphone on that side. And she offered me stress toys, but the only one they had was, like, one that made noise, so I couldn't use it for the thing because they were recording. So it was just not fun at all and I went in by myself because I didn't have an Isva because they didn't offer me one, and I didn't want Mum to come in with me - because that's my mum, and it would be the whole story' – Girl, 15, victim of peer-on-peer sexual assault (March 2023).



> Timely communications and updates on their case. Information on child sexual abuse related prosecution timescales is not in the public domain, but data published by the CSA Centre for 2020/21 and 2021/22 shows a significant increase in the time taken to prosecute the majority of child sexual abuse offences in the Crown Court in 2021/22: it took on average 353 days – nearly a year – to proceed from a charge to completion in court, up by an average of 3 months on the previous year. Overall there was typically a wait of nearly two years from reporting child sexual abuse to the police, to the case concluding in court. Children tell the Commissioner that long waits for decisions are compounded by poor communication from police about what is happening with their case. This prolongs children's trauma, with many feeling they are unable to move on from the experience or get closure.

'I only met [the investigating officer] like a month ago and it's been, like, years...

And that's very hard, isn't it? To be doing this process and not having those updates and not knowing how long it's gonna take' – Girl, 15, victim of peer-on-peer sexual abuse (March 2023)

> Support to heal after harm, regardless of the criminal justice outcome. As well as access to advocacy, children must be able to access wider support services. This includes specialist, community-based services which provide long-term recovery support, such as counselling and therapeutic support, as well as prevention from further harm.

What is needed:

- A Victim's Code of Practice for children with accompanying statutory guidance on how agencies, including those who are not directly accountable for the VCOP such as schools and children's social care, can effectively support children to access their rights under the VCOP.
- In developing the code compliance information for criminal justice bodies, the Secretary of State should set out the framework for police forces and criminal justice bodies to centrally record and report data, and be held to account on:
 - o Pre-interview preparation and needs assessments with children;
 - o How many children have video-recorded interviews, whether police officers' training is regularly refreshed, and whether these interviews are evaluated and quality-assured;
 - o Children's access to advocacy, social workers, and Registered Intermediaries;
 - Timeliness for ensuring child victims' various entitlements are met, including updates about the investigation, and timeliness of charging, prosecution, trial and case completion;
 - Support services children are referred onto, including the type of service, and whether there was a waiting list.



4) Recognition of all child victims of the most serious crimes

All child victims should be represented in this Bill, including those subject to Child Criminal Exploitation (CCE), and those who choose not to report the crime.

4a) Child victims of criminal exploitation

'I was subjected to being exploited for years on end, because I did not believe that the police would support me and protect me from the people that were causing me a great deal of harm' — Boy, 17, victim of CCE who was strip-searched by police, and referred to the National Referral Mechanism.

Children who have been criminally exploited, such as those who have been groomed and coerced into county lines drug dealing, and other criminal activities such as stealing and fraud, are extremely vulnerable. They are victims of abuse. It is often their severe disadvantage that makes them a target for adult criminals.

As there is currently no statutory definition of Child Criminal Exploitation (CCE), children who are forced to commit crimes are often punished rather than being supported and safeguarded as victims first and foremost. This can be a barrier to children disclosing abuse and exploitation - playing into the hand of the adult perpetrator(s). Without a statutory definition of CCE, consistent identification and data collection to understand prevalence of need is more challenging. Various definitions exist, for example the definition in *Keeping Children Safe in Education* is different to that in *Working Together To Safeguard Children*, which is the same as that in the *Serious Violence Strategy*. This leads to confusion and a fragmented local and national picture. Children are often not aware themselves that what they are experiencing is a crime.

This means children who are victimised through criminal exploitation do not always get the support they need. The recent <u>Stable Homes, Built on Love</u> consultation on children's social care identified that there are real challenges in practice when it comes to supporting children who experience harm outside the home, which includes those children drawn into criminal behaviour.

What is needed: A definition of CCE, with guidance flowing from it, would help to improve the identification of children at risk, and allow for more thorough assessment of need. The Commissioner stands with brave survivors of CCE in calling for the *Victims and Prisoners Bill* to introduce a statutory definition of Child Criminal Exploitation (CCE), to ensure children are always seen as victims first and foremost.



4b) Children who choose not to report an offence through the justice system

There should be like a space where [young victims are] open to talk about their feelings, but without feeling pressured to report it straight away... The pressure of having to report is not something [victims] want to deal with, because I think not everyone is ready to go to the police straight away, but they still want that support'

– Girl, 15, victim of child sexual abuse (October 2023).

It is imperative that all victims and witnesses, particularly children, can access support through this legislation without needing to engage with the criminal justice process. The majority of crimes against children and young people are not reported to the police.¹⁴ It can be extremely difficult for child victims to speak about their traumatic experiences of abuse, exploitation and serious violence.

The CCo welcomes the government's inclusion of victims of perpetrators who are not charged or convicted, but the definition must be expanded to explicitly include victims who choose not to report an offence through the justice system – aligning it with the *Victims Funding Strategy*, which sets out to support victims "whether or not they report the offence." ¹⁵

What is needed: The Victims and Prisoners Bill must expand the definition of victim to include victims who choose not to report into the criminal justice system, reflecting the reality that the majority of victims choose not to report an offence, but must still be able to access support under this legislation.

5) Holistic support – A national network of Child Houses

There is a huge range of services that children benefit from accessing after they have experienced harm, such as vital statutory services and specialist children and young people's community-based services, including those designed by and for the communities they serve.

However, not all children currently have equal access to support services. Children's Commissioner research shows that a child in Sunderland waits on average 67 days longer for mental health support than a child in Leicester City. ¹⁶ Children and their families tell the Commissioner they face a postcode lottery when it comes to accessing support from child victims' specialist, community-based services.

When a child experiences the most serious crimes, they should have guaranteed access to high-quality support which meets their multiple, intersecting needs. Rather than a child being split between services, models of care, and thresholds for support, statutory and community-based services in an area should come together to coalesce around the child. This is the principle which underpins the Child House model, based on the Icelandic Barnahus model.



Holistic, child-centred services: The Lighthouse

The Children's Commissioner and her team recently visited The Lighthouse in Camden, which operates the only Child House model in the country. The Lighthouse brings together a range of professionals and organisations under one roof to offer a child-centred, multidisciplinary service for child victims of sexual harm and related crimes. As well as health support, advocacy (such as Chlsvas), third sector and therapeutic support, children can be supported by trained clinical psychologists, police, social workers and registered intermediaries to access their rights to special measures in court proceedings, such as giving evidence through a pre-recorded video interview. This means children and their family do not have to re-live their trauma with multiple professionals.

An evaluation of the Lighthouse found that it generates a net saving in public expenditure.¹⁷ The Child House model has been recommended by the *Independent Inquiry into Child Sexual Abuse*,¹⁸ the Home Office,¹⁹ NHS England,²⁰ and the Government's own *Tackling Child Sexual Abuse Strategy*.²¹

"Somebody else had the control and I don't have to hold on so tightly anymore, and I could sit back and this would take me there – and that was one of the most amazing things ever... [My parents] got a support system through the Lighthouse as well, which is more than I could have hoped for. The Lighthouse is amazing... it was about everything anybody who had been through something could have dreamed of."

-Teenage victim of child sexual abuse (October 2023)

Jenny's story

'Jenny' (not her real name) is a young girl who reported sexual touching by her father. She was referred to the Lighthouse by her social worker. The summary below illustrates how the social work team, Jenny and her mother were able to benefit from the Lighthouse's expertise and joined up model of care.

1) Immediate safety planning

2) Multidisciplinary, holistic needs assessment

- 1. While collating further information on Jenny's case following the referral, social workers from the Lighthouse offered advice and guidance to Jenny's social worker and assisted with identifying some additional safeguarding needs. They supported the local social work team in immediate safety planning.
- 2. Jenny was allocated a Lighthouse Chlsva (Children's Independent Sexual Violence Adviser), paediatrician, play specialist and child and adolescent mental health practitioner (CAMHS) who carried out a multi-disciplinary holistic health and wellbeing assessment in one single appointment. The play specialist prepared and supported Jenny during the medical examination in an age-appropriate way, minimising any distress. This meant that Jenny was able to see four professionals in one location at one appointment, did not have to miss several days of her schooling, and most importantly Jenny and her mother did not have to repeat what had happened to multiple professionals.



3) Bespoke therapeutic support for the child and their family

4) Support to engage with the criminal justice system

- 3. As Jenny's Lighthouse team works in the same building, they were able to quickly convene for the assessment and afterwards to plan Jenny's ongoing Lighthouse care, which included therapeutic and Chlsva support. Jenny's mother received bespoke support via the Lighthouse parent course for parents and carers of children who have experienced sexual abuse, to better understand the impact of the abuse on Jenny, and how to support her at home, as well as being able to speak about her own feelings of guilt and distress and the impact of the abuse on her and the wider family.
- 4. As Jenny and her mother had reported the crime and wanted to engage with the criminal justice process, Jenny's Chlsva requested and supported Jenny's police statement be carried out via a video-recorded interview (VRI) at the Lighthouse, supported by a Registered Intermediary, and thus increasing her chances to give the best possible evidence in a child-friendly environment. The Lighthouse Chlsva was key in supporting the family to remain engaged with the criminal justice process and assist with communication with the investigating officer.

What is needed: Building on the successful development of the first Child House in London and the Home Office's 2021 guidance, the Government should develop a strategy for national rollout of Child Houses, creating a space in every area where local services can come together to support child victims of sexual harm and the most serious crimes in a holistic way.





Independent Public Advocate: "Where an advocate provides support to victims under the age of 18, the advocate may do so only by providing support to such persons as the advocate considers represent those victims."

Victim Information Requests: "If V is a child or an adult without capacity, notice under this section is given to V by giving it to— (a) a parent or guardian of V or, if V is in the care of a relevant authority or voluntary organisation, a person representing that authority or organisation, or (b) if no person described in paragraph (a) is available, any adult who the authorised person considers appropriate."

¹ IICSA (2022) The Report of the Independent Inquiry into Child Sexual Abuse. <u>Link.</u>

² CSA Centre (2021) The scale and nature of child sexual abuse: Review of evidence. Link.

³ Children's Commissioner for England (2019) Childhood vulnerability in numbers. Link.

⁴ ONS (2022) Domestic abuse prevalence and victim characteristics. <u>Link.</u>

⁵ Home Office (2023) Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, Quarter 3 2023 – July to September. Link.

⁶ SafeLives (2022) Insights Idva dataset 2021-22: Adult Independent domestic violence advisor (Idva) services. Link.

⁷ Victims and Prisoners Bill (as amended in Public Bill Committee). Link.

⁸ Research by the Children's Commissioner shows that around 6,500 16- and 17-year-olds presented as homeless last year. Children's Commissioner for England (2023) Homeless 16- and 17-year olds in need of care. <u>Link</u>.

⁹ Department of Health (2015) Mental Health Act 1983: code of practice. Link.

¹⁰ Ministry of Justice (2022) Achieving best evidence in criminal proceedings. Link.

¹¹ Department of Health and Social Care and Ministry of Justice (2022) Draft Mental Health Bill 2022. <u>Link.</u>

¹² HMCPSI and HMIC (2014) Achieving Best Evidence In Child Sexual Abuse Cases – A Joint Inspection. Link.

¹³ Centre of expertise on child sexual abuse (2022) Child sexual abuse in 2021/22: Trends in official data. Link,

¹⁴ Victim Support (2014) Suffering in Silence: Children and unreported crime. Link.

¹⁵ HM Government (2022) Victims Funding Strategy. Link.

¹⁶ Children's Commissioner for England (2023) Children's Mental Health Services 2021-22. Link.

¹⁷ Mayor of London, Office for Policing and Crime (2021) The Lighthouse: Final evaluation report. Link.

¹⁸ IICSA (2022) The Report of the Independent Inquiry into Child Sexual Abuse. <u>Link.</u>

¹⁹ Home Office (2021) Child House: Local Partnership guidance. Link.

²⁰ NHS England (2015) Review of pathway following sexual assault for children and young people in London. Link.

²¹ Home Office (2021) Tackling Child Sexual Abuse Strategy. Link.





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