

***'AN INSPECTION OF HOW WELL THE POLICE AND NATIONAL CRIME AGENCY TACKLE THE  
ONLINE SEXUAL ABUSE AND EXPLOITATION OF CHILDREN'***

**PUBLISHED BY HMICFRS ON 5TH APRIL 2023**

**AVON & SOMERSET PCC RESPONSE DATED 31ST MAY 2023**

The first area of focus in my Police and Crime Plan is vulnerable children and adults; and Child sexual abuse and exploitation (CSAE) is a threat of national importance. CSA involves forcing or enticing a child to take part in sexual activity. This may be physical contact, or non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. CSE is a form of CSA and occurs where people coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator. The victim may have been sexually exploited even if the sexual activity appears consensual. The offences do not necessarily involve physical contact so can and do happen online.

CSAE can have wide-ranging and serious consequences. For some victims and survivors these effects endure throughout adult life. CSAE can affect psychological and physical well-being, family and intimate relationships, faith, education and career. Victims and survivors can also be two to four times more likely to become victims of sexual, physical or emotional abuse again in their lifetime. Given the scale of harm involved it is essential there is a strong response from the police and I welcome the recommendations made to improve.

This report contains 11 recommendations for Chief Constables. These are set out below with the initial response to these after each of them.

It should be noted that I have a legal duty to respond to inspection reports within eight weeks of their publication. However, you will see the Constabulary have many more months to fully complete these recommendations: that's why a number of the responses are still a work in progress. With the support of my office, I oversee recommendations from the inspectorate on a continual basis to help ensure they are completed and will see the results of the audits mentioned.

### Recommendation 1

By 31 October 2023, the National Police Chiefs' Council lead for child protection should work with chief constables and chief officers with responsibilities for regional organised crime units [ROCUs] to introduce regional collaboration and oversight structures to support the Pursue board. This should:

- improve the link between national and local leadership and the frontline response;
- provide detailed, consistent scrutiny of performance; and
- meet chief constables' obligations for tackling online child sexual abuse and exploitation, as set out in the Strategic Policing Requirement.

### Response

In the South West, a regional Assistant Chief Constable (ACC) has responsibility for ROCUs. The ACC has started working with other regional colleagues to look at how this recommendation can be addressed.

### Recommendation 2

By 31 October 2023, chief constables, the director general of the National Crime Agency [NCA] and chief officers with responsibilities for regional organised crime units should make sure they have effective data collection and performance management information. This is so they can understand the nature and scale of online child sexual abuse and exploitation in real time and its impact on resources, and so forces and the National Crime Agency can react quickly to provide adequate resources to meet demand.

### Response

The Constabulary use data visualisation software (Qlik) to make performance information available to relevant colleagues. Data related to online CSAE is overseen by the Detective Inspector from the Internet Child Abuse Team (ICAT). The Constabulary share performance data with the region through the CSAE Tactical Delivery Group, and provide a monthly data return to the NCA. The Constabulary will review how they use robotic process automation to improve these processes.

### Recommendation 5

By 30 April 2025, chief constables should make sure officers and staff dealing with online child sexual abuse and exploitation have completed the right training to carry out their roles.

### Response

There is no national guidance on what constitutes the "right" training. Within the Constabulary all ICAT officers complete the following:

- Professionalising Investigations Programme (level 1 or 2).
- Training in the use of software to triage mobile phones and computers to quickly identify if there is child abuse material on a device.
- Training in how to 'grade' child abuse images in line with legal requirements.

The Constabulary would like the whole team to have done the Specialist Child Abuse Investigators: Development Programme but this has not been possible due to other training needs, but they continue to work towards this.

#### Recommendation 8

By 31 July 2023, chief constables should satisfy themselves that they are correctly sharing information and making referrals to their statutory safeguarding partners in cases of online child sexual abuse and exploitation. This is to make sure they are fulfilling their statutory obligations, placing the protection of children at the centre of their approach and agreeing joint plans to better protect children who are at risk.

#### Response

ICAT proactively engage with children and young people's services to share information and intelligence. However, the Constabulary will check and test their processes and the findings will be overseen by their Child Protection Performance Group.

#### Recommendation 9

By 31 October 2023, chief constables and police and crime commissioners should make sure their commissioned services for children, and the process for referring them for support or therapeutic services, are available for children affected by online sexual abuse and exploitation.

#### Response

ICAT processes involve signposting victims and their families to support services as well as sharing information with the Lighthouse Safeguarding Unit and children and young people's services to enhance the offers of support available. The Constabulary will check and test the current referral processes and availability of services.

I commission a Young Victims Service to provide practical and emotional support to young victims of all crime types. This service employs an 'online harms' champion who specialises in support for young victims of child sexual abuse, online harm and exploitation. I also jointly fund the Avon and Somerset sexual violence therapies contract with NHS England, local authorities and Integrated Care Boards. The service provides a range of distinct, age-appropriate interventions for children and young people, including approaches for working with very young children and those who have experienced online and peer-on-peer abuse. I also commission Independent Sexual Violence Advisors which provides advocacy support to victims where the offence has taken place online. The needs of victims of online CSAE will be further considered in the re-commissioning process.

#### Recommendation 11

By 31 July 2023, chief constables and police and crime commissioners should review the advice they publish, and, if necessary, revise it, to make sure it is consistent with the National Crime Agency's ThinkUKnow (Child Exploitation and Online Protection) material.

### Response

The Constabulary agree to review the content they publish against the ThinkUKnow material. My office do not publish original content in this respect but instead share material published by other agencies like the Constabulary or NCA.

### Recommendation 12

By 31 October 2023, chief constables in England should satisfy themselves that their forces' work with schools is consistent with the national curriculum and National Crime Agency educational products on online child sexual abuse and exploitation. They should also make sure this work is targeted based on joint analysis with their safeguarding partners.

### Response

The Constabulary's primary school packages, "dangers of talking to strangers online" and "dangers of sharing images", reference the PSHE Association Programme of Study for Key Stage 2, focusing on health and wellbeing. Both were designed using resources from the National Society for the Prevention of Cruelty to Children (NSPCC) and Child Exploitation and Online Protection Command (CEOP) resources. The secondary school packages, "Safer Online Relationships" and "Sharing Sexual Images" were designed using ThinkUKnow and Child Net International resources. These lessons are delivered after conversations with schools or when this topic fits in with lessons being taught in line with school curriculum. These sessions are delivered by schools officers, early intervention team officers or neighbourhood officers and are based on the needs for their area and in consultation with the education establishments. In Bristol, there is a monthly meeting between schools officers and education exclusion officers to make sure that the right schools are getting the inputs and engagement from the police that they need.

The child exploitation Prevent Officer also uses CEOP and ThinkUKnow material in her work with schools. This work is also targeted as a result of information from other agencies or sources such as strategy meetings, Child Protection conferences, children and adolescent mental health services (CAMHS), health, social care, schools, children's homes, and voluntary organisations.

### Recommendation 13

With immediate effect, chief constables should satisfy themselves that their crime allocation policies make sure online child sexual abuse and exploitation cases are allocated to those with the necessary skills and training to investigate them.

### Response

The Constabulary will undertake an audit of cases to understand if crimes are being allocated in compliance with their allocation policy.

### Recommendation 14

With immediate effect, chief constables should make sure their force meets any existing recommended timescales for activity targeting online child sexual abuse and exploitation, and arrange their resources to meet those timescales. Then, six months after the new prioritisation tool is implemented, they should carry out a similar review.



### Response

The Constabulary have produced a new process map for ICAT to try and speed up the process from referral to arrest. Work will be undertaken to understand how quickly this is operating and whether it is meeting the recommended timescales.

### Recommendation 15

By 31 October 2023, the National Police Chiefs' Council lead for child protection, chief officers with responsibilities for regional organised crime units and the director general of the national Crime Agency (NCA) should review the process for allocating online child sexual abuse and exploitation investigations, so they are investigated by the most appropriate resource. This should include a prompt way of returning cases to the NCA when forces establish that the case needs NCA capabilities to investigate it.

### Response

The South West Regional ACC has started working with other regional colleagues to look at how this recommendation can be addressed.

### Recommendation 16

By 31 October 2023, chief constables should work with their local criminal justice boards to review and, if necessary, amend the arrangements for applying for search warrants. This is to make sure the police can secure warrants quickly when children are at risk. This review should include the feasibility of remote communication.

### Response

The Constabulary have not noted any local issues working with Criminal Justice partners to obtain search warrants. However, this will be assessed when the other audits are being done (mentioned above).

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