

‘The policing response to the investigation of online child sexual abuse and the management of registered sex offenders’ published by HMICFRS on 15 April 2026

Avon & Somerset PCC response dated 10 June 2026

Effective action to prevent online child sexual abuse and the robust management of registered sex offenders (RSOs) are critical to protecting the most vulnerable and maintaining public confidence in policing and safeguarding arrangements. As digital offending grows in scale and complexity, policing and partner agencies must have the capability, capacity and information-sharing arrangements necessary to identify risk early and intervene decisively. Consistent, proactive management of known offenders is essential to reducing reoffending, preventing further harm and ensuring that safeguarding responsibilities are discharged effectively.

The report highlights committed and professional practice across policing, while also identifying variability in capacity, capability and consistency that must be addressed to reduce risk and improve outcomes. I am committed to working with the Chief Constable and safeguarding partners to ensure these findings are responded to systematically, with a clear focus on accountability, continuous improvement and the effective protection of children and young people. But also recognising the continually increasing number of RSOs and online child sexual abuse and the need to consider how this is responded to at a national and local level.

It should be noted that I have a legal duty to respond to inspection reports within eight weeks of their publication. However, the Constabulary have longer to address these recommendations. Below I set out the recommendations applicable to forces and the initial response to each of these.

Recommendation 1

By 31 October 2026, forces should:

- review existing practices to make sure they use the Kent internet risk assessment tool [KIRAT] and the prioritisation tool to prioritise referrals for all children and adult suspects;
- review their procedures to make sure there is regular assessment of intelligence and risk for online child sexual abuse and exploitation suspects both prior to enforcement and throughout the lifecycle of the investigation; and
- make sure investigations allocated outside online child sexual abuse and exploitation (CSAE) teams remain under the team's management oversight, including a central escalation policy.

Response

The Constabulary's Internet Child Abuse Team (ICAT) already uses both the KIRAT and the National Police Chiefs' Council (NPCC) tiered prioritisation model, with supervisor-assigned response times.

The Constabulary follows a standard operating procedure which sets out a four-phase intelligence process with the intelligence being refreshed at least every three months.

Only ICAT Detective Sergeants (or more senior ranks) are authorised to allocate online CSAE investigations.

Recommendation 2

By 30 April 2027, forces should review existing staffing levels in online child sexual abuse and exploitation teams to make sure that they have enough officers and staff to manage demand effectively and that workloads are manageable.

Response

The Constabulary conducts an annual review of workforce and workload in the ICAT. In addition to this, through daily business, the team leaders have real time management information of workloads and where cases are at different stages of the investigative process. At the time of writing there are a number of vacancies and other abstractions from the team which the Constabulary are in the process of filling.

It is worth emphasising that year-on-year there are increasing numbers of online CSAE cases sent to the Constabulary by the National Crime Agency. These increases are not unique to Avon and Somerset and are a concern nationally. Unless different ways of working are found this will require ever increasing numbers of detectives to respond to and will pull that resource away from other areas of policing.

Recommendation 4

By 31 October 2026, forces should:

- review their online child sexual abuse procedures and make sure that arrest and bail is considered and recorded for all suspects; and
- make sure that when online child sexual abuse suspects are on bail, conditions are proactively checked at least once per applicable bail period.

Response

The Constabulary's standard operating procedure for ICAT states that the starting point is arrest, with clear rationale required where alternative approaches are taken. Bail is utilised in all cases to maintain and manage the behaviour and safeguarding around the suspect. Frequency of bail checks is determined by ICAT supervisors and monitored through their data visualisation tool (Qlik). Arrest, bail and suspect management decisions are explicitly linked to the suicide prevention framework, firearms checks, and safeguarding interviews.

Recommendation 5

By 30 April 2027, forces should make sure that third-party provision is in place to support families of online child sexual abuse suspects and that leaflets with contact details of support organisations are available.

Response

The ICAT team provide a Family Pack which includes safeguarding advice, contact routes and support that is available through third-party organisations. Family support is embedded within the wider safeguarding framework, including referrals to Children's Social Care and partner agencies.

Recommendation 6

By 30 October 2026, forces should:

- review their operating models and governance frameworks to make sure they have a consistent approach to managing registered sex offenders across all teams, including use of the Violent and Sex Offender Register in line with Home Office standards; and
- review the data they collect, how they collect it and how it is presented and make sure that it represents what is on the Violent and Sex Offender Register [VISOR]
- to accurately assess and manage the risk of registered sex offenders.

Response

Over the last 12-18 months the Constabulary have recruited an additional eight offender managers and created an Offender Management Investigation Team (OMIT) of 12 officers.

The demand and resource is kept under review as there has been a consistently growing number of RSOs to manage: in 2025 the expected increase was 3% but the actual increase was double this. This is a national challenge, not unique to Avon and Somerset, and in order to continue to deliver a proportionate response to demand and risk new ways of working will need to be considered as otherwise increasingly more policing resource will be drawn into RSO management and impacting other aspects of service the police deliver.

The Constabulary use Qlik which draws data from the VISOR system. The Senior Leadership Team (SLT) review this data at their monthly meeting which includes:

- Volume of RSOs in the community
- Caseloads per offender manager
- Overdue visits, risk assessments or Risk Management Plans

- Numbers and percentage of successful visits / visit completion rate
- Compliance with double-crewed and unannounced visits
- Staffing abstractions including reasons for abstractions (e.g. sickness, vacancy) and consequent actions
- Compliance of supervisory reviews
- Wanted offenders

This performance is also scrutinised by the Directorate Leadership meetings.

Recommendation 8

By 31 October 2026, forces should:

- use previous demand trends and review predicted demand for management of sexual offenders and violent offenders teams for five years to make sure that they have enough offender managers and supervisors to manage this;
- make sure that management of sexual offenders and violent offenders team abstractions are recorded, reviewed, don't happen on a regular basis and don't have a negative effect on workload completion;
- make sure that management of sexual offenders and violent offenders teams have manageable numbers of outstanding active risk management systems assessments, risk management plans and visits and that these are assessed by both risk level and how overdue they are; and
- make sure that supervisors are completing reviews of active risk management systems assessments, risk management plans and visits promptly and within one month.

Response

The response to this is covered by the response to Recommendation 6. It is worth noting that the Constabulary were given an Area for Improvement (AFI) in their PEEL assessment in 2025 which related to the management of RSOs (including visits and risk assessments). This AFI has been closed and signed-off by the Inspectorate in October 2025.

Recommendation 10

By 31 October 2026, forces should make sure that:

- home visits are unannounced and carried out in pairs to comply with the College of Policing authorised professional practice for the management of sexual offenders and violent offenders;
- visits that don't comply with the authorised professional practice for the management of sexual offenders and violent offenders are authorised, the rationale is recorded on the Violent and Sex Offender Register and that a system is in place to allow assessment of the decision;
- any reactively-managed registered sex offenders meet the conditions set out in the authorised professional practice for the management of sexual offenders and violent offenders; and
- they carry out and assess Police National Database [PND] checks on registered sex offenders.

Response

The Constabulary's policy is that home visits are unannounced and carried out in pairs; and in exceptional circumstances where this doesn't happen this is recorded with rationale and reviewed in the aforementioned SLT meetings.

The Constabulary have procedural guidance for Reactive Management of RSOs. This ensures that they are compliant with Authorised Professional Practice (APP) regarding Managing Sexual and Violent Offenders. This includes the undertaking of PND checks.

Recommendation 15

By 31 October 2026, forces should:

- make sure psychological health screening is mandatory and provided at least annually (as per guidance from the National Police Wellbeing Service) for management of sexual offenders and violent offenders and online child sexual abuse and exploitation team members and supervisors with access to follow-on well-being services; and
- make sure that management of sexual offenders and violent offenders and online child sexual abuse and exploitation team supervisors have regular trauma-informed training and knowledge sharing to identify signs of trauma, burnout and other well-being issues and that they can refer to and access timely support and treatment where needed.

Response

Psychological health screening is provided annually by the Constabulary. In addition to this team members are able to request support themselves at any time and supervisors are also able to request this support for the people they manage.

Both teams follow national guidance on wellbeing. Supervisors conduct regular one-to-ones incorporating reflective practice, welfare checks and decompression utilising the Constabulary framework. Quarterly Continuing Professional Development (CPD) considers wellbeing and trauma informed practice during each day, and bespoke sessions on TRiM (Trauma Risk Management), trauma informed practice, Occupational Health provision and signposted support will be delivered annually.

Recommendation 16

By 31 October 2026, forces should make sure that they have a strong service level agreement in place with the Probation Service and that they have a two-way process for review, feedback and escalation to make sure safeguarding opportunities aren't being missed.

Response

All RSOs are managed under Multi-Agency Public Protection Arrangements (MAPPA). The Constabulary follow National MAPPA Guidance which requires:

- Clear ownership of lead agency
- Documented decision-making
- Ongoing review
- Escalation from single-agency to multi-agency management where safeguarding concerns increase.

The Constabulary and Probation undertake:

- regular MAPPA reviews – creating formal feedback loops, ensuring concerns identified by either agency trigger reassessment or potential escalation
- joint risk re-assessments following new intelligence, breaches, escalating behaviour or safeguarding concerns
- joint CPD training
- MAPPA audits to identify learning.

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