



OPCC

Office of the Police &
Crime Commissioner
for Gloucestershire

09 June 2023

An inspection of how well the police and National Crime Agency tackle the online sexual abuse and exploitation of children

I welcome this thematic report of the NCA from His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) into such an important issue – the protection of children and young people online.

I also welcome the 17 recommendations relevant to the police service and will seek assurance from the Constabulary as to progress against these recommendations within my usual governance structures.

Chris Nelson

Gloucestershire Police and Crime Commissioner

Gloucestershire Constabulary

Police Headquarters

No.1 Waterwells, Waterwells Drive

Quedgeley, Gloucester. GL2 2AN

Tel: 101 www.gloucestershire.police.uk



To Ruth Greenwood
Chief Exec to OPCC

Our Ref: T/ACC Rich Ocone

Email:

Ruth.Greenwood@gloucestershire.police.uk

Email:

Richard.Ocone@gloucestershire.police.uk

Date:

26 May 2023

Dear Ruth

Re: An inspection of how well the police and National Crime Agency tackle the online sexual abuse and exploitation of children

Please find below our response to the above report, aimed at assisting you to meet the requirements of Section 55(1) of the Police Act 1996.

The report is a thematic report of an inspection into the NCA and contains a total of 17 recommendations, nine of which relate to the police service. These have been considered by our Head of Public Protection (PPU), and he has recorded the Constabulary's current position in relation to them. Additionally SWROCU information from ACC Holden has been included where relevant.

The report recommendations relating to other agencies will be monitored for progression and, as with other HMICFRS reports, the Inspection Oversight Meeting offers an opportunity for us to track progress and risks internally.

Yours sincerely,

Richard Ocone

T/Assistant Chief Constable 252434

Operations

Gloucestershire Constabulary

1 Waterwells, Waterwells Drive, Quedgeley, Gloucester, GL2 2AN

Direct Dial: 01452 752334 Mobile: 07966 517103

www.gloucestershire.police.uk | [Twitter page](#) | [Facebook page](#)



National Crime Agency tackle the online sexual abuse and exploitation of children

Gloucestershire Constabulary's Response.

Recommendations		
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 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 Requirements	31/10/23 NPCC	The Force await guidance and support as required and where necessary. However, teams in the Public Protection Unit (PPU) will respond to calls for service from the Regional Organised Crime Unit (ROCU) and the National Crime Agency (NCA) and other national agencies as required. A PPU Tasking meeting is in place and a monthly performance report is already prepared by the Force Performance Team. The Unit are represented at regional and national meetings for Child Sexual Abuse (CSA), Serious and Organised Crime (SOC), Tackling Organised Exploitation (TOEX), Children and Young People (CYP) Regional Strategic Meetings, and Child Centred Policing Strategic Framework. The Regional Organised Crime Threat Assessment (ROCTA) provide a Child Sexual Exploitation (CSE) strategic briefing which informs tasking processes. Performance is monitored including Agency and Partner Management Information System Agency

We are committed to being an anti-discriminatory organisation. This means not only acting in a non-discriminatory way, but addressing systemic inequalities, disadvantage and discrimination.

	and Partner Management Information disruptions under the 4 Ps plans for Child Sexual Abuse and Exploitation (CSAE). Update from Regional ACC: CSAE (including online) remains a control strategy priority for the SW Region (2023 Regional Strategic Tasking sat in May 2023). As such it has a Strategic Governance Group (forming part of the Vulnerabilities SGG) to oversee activity and close the threat gap. The SGG has a number of Thematic Delivery Groups (TDG's) which feed the Vulnerabilities SGG. One of these is specific to CSAE and is chaired by Detective Chief Superintendent Sheon Sturland. The TDG and the SGG scrutinise performance in the ROCU and across the region, in particular the online CSE performance and the performance of the force IIOC/POLIT teams in respect of the NCA disseminations. The SGG/TDG structures ensures the development of delivery plans for all the control strategy areas. TOR for both the SGG and TDG have recently been strengthened to reflect a stronger focus on performance and the ROCU will be providing support to develop more effective performance frameworks. In addition to the SGG and TDG structure, DCS Sturland attends the national CSAE pursue boards which ensures a strong link between the national leadership and the frontline response (attended through the SW Regional CSAE TDG). This structure supports the aspirations of the pursue board. The SGG/TDG structure has existed in the South West for several years and has always had either a standalone CSAE SGG or a Vulnerabilities SGG which CSAE forms a constituent part of (currently the Vulnerabilities SGG looks at CSAE, MSHT and Organised Immigration Crime).
--	--

		In addition to the SGG, there is a regional ACC meeting (chaired by ACC Holden) which can be used to reinforce the requirements of the SGG's where necessary.
Recommendation 2 By 31 October 2023, chief constables, the director general of the National Crime Agency 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.	31/10/23 CC NCA	Data is collated in the Indecent Images of Children Unit (IIOC) and then sent to the region, which is forwarded to the Home Office, this data relates to tasks actioned by the IIOC team locally. CSE data is included in a weekly report - the crimes and PPU document. For IIOC individual officer's data relating to workloads and staffing numbers is passed to the DCC as part of a weekly pacesetter meeting. The Force receives regional threat assessments for CSAE and a performance breakdown from the regional CSA meeting. This includes an assessment against recommendations and was shared as part of the papers used to gauge Force performance to IIOC. A benchmarking exercise against other forces performance has been recommended and will be undertaken. Update from Regional ACC: Forces in the South West already supply the ROCU with data to enable a stronger understanding of themes and trends. There are plans to expand this data collection and performance management through the TDG and SGG. The South West will support the development of any further performance frameworks to provide better understanding and visibility of CSAE.

		The creation of a performance framework needs to include broader information than just the NCA referrals. These are only one source of demand that forces and ROCU's deal with and the NCA referrals need to be considered alongside the other cases that forces are managing, particularly in their IIOC/POLIT teams. A framework that only includes NCA referrals could deter forces from being pro-active in this space. The South West ROCU will support the appropriate data collection and development of the performance management information through the SGG/TCG structure, ensuring consistency with any nationally agreed collection/framework to allow effective national performance management.
Recommendation 3 By 31 October 2023, the National Police Chiefs' Council lead for child protection, the director general of the National Crime Agency and the chief executive of the College of Policing should jointly agree and publish interim guidance for all officers and staff dealing with online child sexual abuse and exploitation. The guidance should set out their expectations and reflect the findings of this inspection. It should be incorporated into subsequent revisions and additions to authorised professional practice.	31/10/23 NPCC NCA CoP	Publication of the guidance is awaited and will be considered.
	30/04/24	Publication of the material is awaited and will be considered.

Recommendation 4 By 30 April 2024, the chief executive of the College of Policing, in consultation with the National Police Chiefs' Council lead for child protection and the director general of the National Crime Agency, should design and make available sufficient training material to make sure frontline staff and specialist investigators dealing with online child sexual abuse and exploitation can receive the right training to carry out their roles.	CoP NPCC NCA	
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.	20/04/25 CC	All officers within IIOC are trained to level 3 of the KIRAT (Kent Internet risk assessment tool), which is a tool designed to assess the level of risk posed by a suspect. The Force have internal training delivered by the IIOC Detective Sergeant and also planned sex offender interview training being purchased. However, the specific training mentioned in the recommendation would be recommended and supported for all relevant staff.
Recommendation 6 By 31 July 2023, the National Police Chiefs' Council lead for child protection should provide the new prioritisation tool to law enforcement bodies. It should include: expected timescales for action; clear expectations about who should use it and when; and	31/07/23 NPCC	The prioritisation tool is awaited.

who cases should be allocated to. Then, 12 months after those bodies have implemented the tool, the National Police Chiefs' Council lead for child protection should review its effectiveness and, if necessary, make amendments.		
Recommendation 7 By 31 October 2023, the Home Office and relevant National Police Chiefs' Council leads should consider the scope of the Transforming Forensics Rape Response Project to assess the feasibility of including online child sexual abuse and exploitation cases in it.	31/10/23 HO NPCC	The outcome of the assessment is awaited.
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.	31/07/23 CC	The Force do not hold back disclosure of IIOC/CSE offences. In research for proactive arrests, liaison is made with the Force MASH (Multi Agency Safeguarding Hub) and they include Social Care and Early Help in line with working together. Data is shared at an early stage with a further disclosure after proactive steps have been taken. Information is also shared at the end of an investigation and this is captured in the supervisor's templates used within our records management system. The county is a singular local authority so this makes disclosure easier in Gloucestershire. The Force fully engage with the Gloucestershire Safeguarding Children Partnership (GSCP) and chair the Child Exploitation subgroup which covers the multi-agency response to child sexual and criminal exploitation (including online). There is a statutory process (SIN) which is

		working very well, encouraging agencies to share their concerns in practice transparently for partnership review at a senior level. Research to identify and adopt best practice from other well performing forces such as Humberside and Wiltshire is being undertaken.
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.	31/10/23 CC	MASH refer cases on to the Gloucestershire County Council early help function and then a decision is made to refer to the relevant support service in the County. There are a lot of schemes to support child victims within the county and these are all accessed via the early help process. The new PDVM considers children subject to Intel report and opens up a new process for consideration of emerging risk for children who have not reached the level 4 Level of Intervention (CP plan). The MASH are alerted to victims via completion of a risk assessment form, known as a VISTs. (Vulnerability Identification Screening Tool). The VIST can be completed by Officers and partners. For the purposes of informing this return and onward transmission, the OPCC may wish to include further information of their commissioned services?
Recommendation 10 The Home Office and the Department for Science, Innovation and Technology should continue working together to make sure online safety legislation requires the relevant companies to develop and use effective and accurate tools and technologies to identify child sexual	No date HO DSIT	The Force looks forward to progression of this recommendations, which it sees as being beneficial.

abuse material, whether or not it was previously known. These tools and technologies should prevent that material being uploaded or shared, including in end-to-end encrypted services. Companies should also be required to locate, remove and report the presence of that material to the designated body.		
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.	31/07/23 CC	The Force external website contains information pages and useful links on how to protect children whilst they are online: https://www.gloucestershire.police.uk/advice/advice-and-information/caa/child-abuse/ Included within the pages are links to the thinkyouknow website run by CEOP.
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.	31/10/23 CC	This is covered by the Force ShoolBeat team, who work with schools and identify areas of education and relevance. There are sessions included on sexting, sextortion and online exploitation, which is reviewed and refreshed on a yearly basis. Schoolbeat is led by an Inspector who is a member of the GSCP Education Subgroup and who works closely with education authority representatives, this team also support PCSO and officers who engage with children outside of the Schoolbeat remit with delivering Cyber Safety messages with consistency.
Recommendation 13 With immediate effect, chief constables should satisfy themselves that their crime allocation policies make sure online child sexual abuse and	Immediately CC	The Force has a Crime Allocation Policy that covers a number of crime types.

exploitation cases are allocated to those with the necessary skills and training to investigate them.		CSAE Crimes falling within the Crime Command are emailed to the relevant PPU email inbox, which is then reviewed by the Detective Sergeant and allocated accordingly. The Force Policy is reviewed at relevant points to ensure that it remains up to date. This is currently being done as a part of Force structural changes known as the Enhanced Operating Model (EOM). A skills and annual crime training plan is held by the Force Learning & Development Department.
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.	Immediately CC	The Force do not currently have the resources to be able to meet the timescales for this recommendation. It is noted that there are recommended KIRAT timescales but Forces can adjust this if they deem necessary. Resourcing has been highlighted through the EOM process and there is an anticipated uplift in resources in the department from June 2023. The new prioritisation tool has not yet been implemented, however once it has a further review will be completed. Consideration to mandating the new tool may be beneficial to Forces in the achievement of this recommendation.
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	31/10/23 NPCC ROCU NCA	Whilst this recommendation is not applicable to the Force specifically, the South West ROCU is involved in this work and are supportive of the Force in this regard. Update from Regional ACC: DCS Sheon Sturland attends the national CSAE pursue meetings and will support the development of a more effective allocation process, including one which allows the return of cases to the

returning cases to the NCA when forces establish that the case needs NCA capabilities to investigate it.		NCA. Once that is developed the SGG/TCG structure will monitor performance against the allocation process, to ensure it is working effectively. Relevant escalation mechanisms will need to form part of the allocation process. Any allocation process will need to consider the demands that exist in the force IIIOC/POLIT teams from other sources and in respect of the ROCU capabilities, will need to be nuanced to recognise the way different ROCU's have evolved, in particular UCOL and investigative teams.
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.	31/10/23 CC	The Force benefit from access to obtain warrants via a telephone call or online process, with access to the out of hour's system, therefore this has not presented any issues. The South West CPS facilitate an online booking system for warrants which is regularly reviewed and allows for urgent warrant applications slots to be available on a daily basis.
Recommendation 17 By 31 July 2023, the National Police Chiefs' Council lead for child protection, the director general of the National Crime Agency and the chief executive of the College of Policing should review and, if necessary, amend the information packs given to families of suspects to make sure they are consistent nationally (notwithstanding local services) and that they include information that is age-appropriate for children in the household.	31/07/23 NPCC NCA CoP	The Force looks forward to progression of this recommendations, which it sees as being beneficial.

End/.

Official