

**OPCC**Office of the Police &
Crime Commissioner
for Gloucestershire

Gloucestershire Police and Crime Commissioner (PCC) response to inspections of Gloucestershire Constabulary published by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)

Section 55 of the Police Act 1996 (as amended by section 37 of the Policing and Crime Act 2017) requires local policing bodies to respond to recommendations in inspectors reports within 56 days

Title of inspection:	The policing response to the investigation of online child sexual abuse and the management of registered sex offenders PEEL spotlight report			
Link to inspection report:	The policing response to the investigation of online child sexual abuse and the management of registered sex offenders - His Majesty's Inspectorate of Constabulary and Fire & Rescue Services			
Date of publication:	15/04/2026			
Type of inspection:	Gloucestershire Specific	☐	Regional	☐
	Follow up	☐	National	☒
	Partner inspection	☐	Thematic	☐
	Spotlight report	☒	Joint inspection	☐
Is Gloucestershire quoted in the report?	Yes	☐	No	☒

Summary of report

HMICFRS's 2026 report, *The policing response to the investigation of online child sexual abuse and the management of registered sex offenders*, found that police forces across England and Wales are struggling to meet rapidly increasing demand in both online child sexual abuse investigations and the management of registered sex offenders.

HMICFRS found that online child sexual abuse and exploitation (OCSAE) and management of sexual or violent offenders (MOSOVO) teams are under significant and increasing pressure nationally. Demand continues to rise and forces, alongside national policing bodies, need greater investment in research, technology, workforce capacity and specialist training.

Most forces now have improved governance and operating models for online child sexual abuse investigations. However, many continue to struggle with high workloads, delays and insufficient staffing. In some forces, intelligence linked to outstanding referrals is not routinely reviewed, meaning changing risk levels may not be identified promptly. Some investigations take more than 12 months to conclude and several forces still have backlogs which exceed national prioritisation timescales.

HMICFRS identified significant concerns around workforce capability. Many forces do not have enough trained investigators or supervisors, and there remains no nationally accredited training course specifically for online child sexual abuse investigations or for MOSOVO supervisors. The report highlights the need for clearer, more accessible national guidance and improved digital investigation skills.

The report also identified inconsistent approaches to risk management. Some forces rely on voluntary attendance rather than arrest, reducing safeguarding opportunities. Bail conditions are not always used effectively and some forces fail to carry out bail compliance checks. In relation to registered sex offenders, forces were inconsistent in using national guidance, conducting home visits, completing risk assessments and maintaining accurate records on ViSOR.

HMICFRS found weaknesses in performance monitoring and demand management within MOSOVO teams. Some forces had large backlogs of overdue Active Risk Management System (ARMS) assessments, Risk Management Plans and offender visits. High offender manager caseloads and insufficient supervisory capacity were common concerns, with some supervisors overseeing up to 500 offenders.

The report emphasised the importance of investing in technology and digital forensics capability. Some forces face delays of up to two years in examining digital devices, creating safeguarding risks and delaying justice for victims. HMICFRS also highlighted inconsistent access to digital tools, insufficient digital training and backlogs in uploading indecent image data to the Child Abuse Image Database (CAID).

Wellbeing support for staff was another major concern. HMICFRS found some forces relied on officers and staff self-identifying welfare needs, rather than proactively providing structured psychological support. The report concludes that mandatory wellbeing provision and trained supervisors are essential given the traumatic nature of the work.

Finally, HMICFRS stressed the importance of effective partnership working with probation, children's social care and neighbourhood policing teams. Stronger information sharing and joint safeguarding arrangements were identified as critical to reducing risk and protecting children and communities.

Key findings:

Key national findings included:

- Referrals from the National Crime Agency relating to online child sexual abuse increased by 66% between 2023 and 2024, rising from 12,469 to 20,704 cases.
- The number of registered sex offenders has increased by 48% over the last decade, reaching more than 73,000 nationally.
- Investigators in some forces were carrying unmanageable workloads of up to 54 active cases each.
- Digital forensic delays of up to two years were identified in some forces, creating safeguarding risks and delaying investigations.
- HMICFRS found inconsistent approaches to offender management, including weaknesses in risk assessments, supervision, home visits and management of information on ViSOR.
- The report highlighted a lack of nationally accredited specialist training and inconsistent use of digital investigation capability across forces.

HMICFRS concluded that, while officers and staff are committed and working under significant pressure, the current national response “falls short of what the public should expect” and requires stronger investment, national coordination, improved workforce capacity and enhanced technology.

Recommendations

The report made 16 recommendations to police forces, the Home Office, NPCC and the College of Policing to strengthen safeguarding, improve investigative standards, enhance offender management arrangements and build sustainable specialist capability.

Recommendation 1

By 31 October 2026, forces should:

- review existing practices to make sure they use the Kent internet risk assessment tool 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 teams remain under the team's management oversight, including a central escalation policy.

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.

Recommendation 3

By 31 December 2026, the College of Policing should:

- review the 'Online Child Sexual Abuse and Exploitation: Practice Advice for Investigating Online CSAE' and create an authorised professional practice for this area in conjunction with this advice; and
- implement a national investigators' course for the management of online child sexual abuse and exploitation.

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.

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.

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 to accurately assess and manage the risk of registered sex offenders.

Recommendation 7

By 30 April 2027, the Home Office should continue to consult with police forces on the need to fund further development of the new Multi-Agency Public Protection System after its introduction, including enhanced management information to help forces properly manage the risk posed by registered sex offenders.

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.

Recommendation 9

By 30 April 2027, the Home Office in conjunction with the College of Policing and the National Police Chiefs' Council should evaluate the potential for an effective and expedited process for police application to the courts to remove Sexual Harm Prevention Orders for appropriate cases.

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 checks on registered sex offenders.

Recommendation 11

By 30 April 2027, the College of Policing in conjunction with the National Police Chiefs' Council should review the authorised professional practice for the management of sexual offenders and violent offenders with forces and publish an updated version.

Recommendation 12

By 30 April 2027, the College of Policing should:

- make sure that a bespoke national digital training course is mandated for management of sexual offenders and violent offenders offender managers; and
- develop a bespoke management of sexual offenders and violent offenders supervisors' training package to make sure that they have sufficient training and skills to consistently carry out their roles.

Recommendation 13

By 30 April 2027, the Home Office and National Police Chiefs' Council should carry out a cost-benefit analysis for a procurement exercise for all 43 forces in England and Wales to purchase digital triage equipment collectively, rather than individually, for investigating online child sexual abuse and the management of sexual offenders and violent offenders.

Recommendation 14

By 31 December 2026, the National Police Chiefs' Council and College of Policing should develop a risk assessment tool that allows each of the 43 forces in England and Wales to consistently assess and prioritise the submission and examination of digital devices in a way that also effectively reduces the existing backlog.

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.

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.

PCC response

As Police and Crime Commissioner for Gloucestershire, I welcome HMICFRS's spotlight report examining the national policing response to online child sexual abuse and exploitation (OCSAE) and the management of registered sex offenders (MOSOVO).

The report highlights the significant and growing pressures facing police forces nationally, particularly increasing investigative demand, digital forensic challenges, workforce pressures and the complexities associated with managing high-risk offenders. I recognise the seriousness of these findings and fully support the report's emphasis on safeguarding children and protecting communities.

In Gloucestershire, tackling violence against women and girls, protecting children and vulnerable people, and ensuring robust offender management remain key policing priorities, as evident in my Police and Crime Prevention Plan. I acknowledge that online offending presents evolving risks which require continuous investment in specialist capability, technology and partnership working.

I particularly note HMICFRS's findings that many forces nationally are experiencing challenges relating to:

- increasing numbers of online child abuse referrals;
- delays in digital forensic examinations;
- high investigator and offender manager workloads;
- inconsistent application of national guidance; and
- recruitment, retention and wellbeing of specialist staff.

I also acknowledge the report's conclusion that sustained national investment is required in specialist training, digital capability and workforce resilience.

I recognise that the findings of this report align closely with the wider national policing reform agenda, particularly the need to strengthen specialist safeguarding capability, improve the use of technology and digital forensics, modernise workforce skills and enhance multi-agency public protection arrangements. Gloucestershire Constabulary will continue to engage with national reform programmes and emerging best practice to ensure local services remain effective, resilient and focused on protecting vulnerable people.

I remain committed to working with the Temporary Chief Constable to address the issues raised in this report. I am reassured by the Constabulary's ongoing commitment to continuous improvement and recognise the dedication of officers, staff and partner agencies working in extremely challenging and complex areas of policing.

I note the formal response from the Constabulary and will hold the Constabulary to account for the nine relevant recommendations in this report (recommendations 1, 2, 4, 5, 6, 8, 10, 15 and 16). Progress will be monitored via established governance arrangements.

A handwritten signature in black ink, reading "Chris Nelson". The signature is written in a cursive, flowing style.

Chris Nelson

Police and Crime Commissioner for Gloucestershire



The policing response to the investigation of online child sexual abuse and the management of registered sex offenders

Recommendation No 1 (23761)

The constabulary provides the below response in relation to the recommendation:

By 31 October 2026, forces should:

- ***review existing practices to make sure they use the Kent internet risk assessment tool and the prioritisation tool to prioritise referrals for all children and adult suspects;***
- ***review their procedures to make sure there is regular assessment 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 teams remain under the team's management oversight, including a central escalation policy.***

Gloucestershire Constabulary use both the KIRAT and prioritisation tool for all children and adult suspects.

The team Sergeant ratifies a risk assessment when the referral is received from the NCA, once the initial research is complete. The referral is then reviewed in line with the crime review policy every 28 days, although due to capacity of the team Sergeant, investigation reviews often take place at greater intervals than the 28 days. The team Sergeant is responsible for 126 active occurrences. The review of a risk assessment is part of the investigation review.

No NCA referrals are allocated outside of the team in Gloucestershire Constabulary. Gloucestershire IIOC are responsible for all NCA referrals from low to

very high. Other investigations involving indecent images of children, which do not originate from a NCA referral, are allocated outside of the IIOC team. There is no capacity within the IIOC team to respond to anything other than industry referrals. However, there is a desire to form a new team with a Detective Sergeant and five PIP1 officers to investigate all reported non-industry indecent images of children offences. A paper was submitted and agreed in principle, but it is currently on hold pending the whole constabulary review.

Recommendation No 2 (23785)

The constabulary provides the below response in relation to the recommendation:

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.

There are currently 33 unallocated outstanding referrals from the NCA. 23 of them are either in the research stage or awaiting communication application results. The active investigations across the investigators range from 9 to 19 investigations. The team provide an update of outstanding unallocated referrals every two weeks to the Inspector who can raise this to SLT, if necessary. The service choice review submitted to the organisation in July 2025 recommended an uplift of a Detective Sergeant. In addition, a further uplift of a Detective Sergeant, along with five PIP1 officers was recommended in a paper which sought to respond to all demand from IIOC that is currently investigated across the force. Both proposals are currently on hold whilst the constabulary undergoes a whole constabulary review. In addition, recent communication from the NCA suggests that demand has increased in 2026 by 16% on the 2025 weekly average and 52% on the 2023/24 weekly average. The CSERB, within the NCA, are working towards increasing their weekly national disseminations by a further 17% from April 2026 onwards, so a further increase in resources may be necessary once the full impact in Gloucestershire is understood.

Recommendation No 4 (23757)

The constabulary provides the below response in relation to the recommendation:

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.***

The vast majority of referrals for adult suspects are dealt with by way of arrest and bail. There are currently only three suspects released under investigation and these decisions have been made due to the medical health of those suspects.

All suspects have a flag added to their NICHE occurrence that will alert the OIC of any incident or intelligence. This will give an early indication that a risk level requires review by the team Sergeant. Should a new incident or intelligence raise concern about the risk level, then the associated forensic review will be brought forward.

The OIC will review the Force systems when extending the bail to establish if there have been any occurrences or intelligence that raises the risk.

Timeliness of investigations against the Force average means that most investigations are received by the CPS within six months of arrest.

Force resources do not currently allow for the proactive checking of a suspect's bail conditions.

Recommendation No 5 (23786)

The constabulary provides the below response in relation to the recommendation:

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.

Gloucestershire Constabulary provide the NPCC family booklet, which provides details of support organisations available. The team also refer families to Acts Fast and Talking Forward (peer support network).

Recommendation No 6 (23752)

The constabulary provides the below response in relation to the recommendation:

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 to accurately assess and manage the risk of registered sex offenders.***

Gloucestershire Constabulary manages all registered sex offenders, MAPPA violent offenders and Potentially Dangerous persons from within Public Protection.

There are two teams that manage this cohort of offenders;

1. Integrated Offender Management, who manage a small number of domestic abuse offenders in support of a Multi-Agency Tasking and Coordinating Top 10. ViSOR is not consistently used by IOM and IDIOM is used as a case records data base. The IOM performance dashboard is not fit for purpose. We have sought support from the Performance team, however, due to their current capacity, the IOM manager is manually reporting performance. This will be reviewed in light of the move to OMIS360 in 2027.
2. Management of Sex Offenders and Violent Offenders who manage all registered sex offenders, relevant MAPPA violent offenders and Potentially Dangerous persons. VISOR is consistently used in these cases which then populates a performance dashboard.

Recommendation No 8 (23759)

The constabulary provides the below response in relation to the recommendation:

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.***

Gloucestershire Constabulary can track and predict future demand in terms of offender cohort growth. Nationally, it is predicted that cohorts will grow annually at around 10%, in Gloucestershire we can predict this at circa 7%.

Gloucestershire has placed significant investment in its MOSOVO team since 2023 with two additional Sergeants and seven additional offender managers (constables). The Chief Officer Group understand the need to continue to review resourcing annually and add further investment as is required to meet increased demand.

Gloucestershire has previously reduced MOSOVO officer abstraction by removing them from 'nighttime economy duty'. Due to operational resourcing challenges in Response, IOM staff can be requested for these duties. Abstractions are regular and they are impactful upon a small team. This is being addressed with the duty planning team.

Gloucestershire does not have the offender manager or supervisory capacity to meet the deadline of one month in respect of its attendance, completion and assessment of home visit, RMP and ARMS. To achieve this, additional resourcing will have to be considered. This data can be tracked via the performance dashboard and is readily available to senior leaders.

Recommendation No 10 (23758)

The constabulary provides the below response in relation to the recommendation:

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 checks on registered sex offenders.***

Home visits are unannounced and carried out in pairs as per the Force policy and APP – where this is not followed, then a rationale is recorded on ViSOR.

All offenders in reactive management are managed as per force policy and APP, relevant PND checks are completed.

Recommendation No 15 (23750)

The constabulary provides the below response in relation to the recommendation:

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.***

The Constabulary is reviewing its approach to psychological health screening for MOSOVO officers and trauma-informed training in line with this recommendation.

Recommendation No 16 (23751)

The constabulary provides the below response in relation to the recommendation:

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.

Gloucestershire has an effective information sharing and service level agreement that is under review for 2026 and reports to the Strategic Management Board. There is a process of annual dip sample and case review for Level 1 and 2 cases. Relationships exist whereby operational challenge and escalation can be raised at Inspector, Chief Inspector and Superintendent ranks. Partners meet monthly at a breakfast meeting to ensure relationships remain strong and issues arising can be addressed swiftly.