



Office of the Police and Crime

Commissioner

PO Box 688

PE29 9LA

Tel: 0300 333 3456

Email: [Cambs-pcc@cambs.police.uk](mailto:Cambs-pcc@cambs.police.uk)

Twitter: [@PCCCambs](https://twitter.com/PCCCambs)

Rt Hon James Cleverly MP  
Home Secretary  
2 Marsham Street  
London  
SW1P 4DF

2 February 2024

Dear Home Secretary

**HMICFRS Report: An inspection of the effectiveness of the police and law enforcement bodies' response to group-based child sexual exploitation in England and Wales.**

Under Section 55(5) of the Police Act 1996, as Police and Crime Commissioner I am pleased to provide my formal response to the report by HMICFRS entitled 'An inspection of the effectiveness of the police and law enforcement bodies' response to group-based child sexual exploitation in England and Wales'.

Both the Chief Constable and I welcome the publication of this report and I wanted to highlight that in Cambridgeshire we have mature partnership working arrangements. Our local Safeguarding Board structure and Domestic Abuse and Sexual Violence Strategic Board facilitates strong inter-agency working and in particular has enabled the recent development of a partnership Child Sexual Abuse Strategy. This was launched at a countywide event in December attended by a wide range of strategic and operational professionals from all agencies. Importantly a victim of Child Sexual

Exploitation (CSE) attended the event and shared her experiences while being supported by her Child/Young Person Independent Sexual Violence Advocate. This provided an important opportunity for all agencies, including policing, to reflect upon the impact of policy decisions and actions upon actual victims.

Locally I have commissioned support services for young victims of CSE through a locally-based national charity Embrace – Child Victims of Crime and through the Cambridge and Peterborough Rape Crisis Partnership. These services ensure young people can access emotional, practical and therapeutic support and that their voice is heard and listened to. In particular the Child/Young Person Independent Sexual Violence Advocates, mentioned above, will support victims and survivors through any court process.

The Chief Constable's response to the recommendations is shown at Appendix 1.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Darryl Preston', with a stylized, cursive style.

**Darryl Preston**

**Police and Crime Commissioner for Cambridgeshire and Peterborough**

Enc - Appendix 1 – Cambridgeshire Constabulary's response to HMICFRS report 'An inspection of the effectiveness of the police and law enforcement bodies' response to group-based child sexual exploitation in England and Wales'.

**Cambridgeshire Constabulary's response to HMICFRS report 'An inspection of the effectiveness of the police and law enforcement bodies' response to group-based child sexual exploitation in England and Wales'.**

**Recommendations:**

**Recommendation 1**

By 31 December 2024, the Home Office, the Department for Education, the Welsh Government, the National Crime Agency, the National Police Chiefs' Council and the College of Policing should adopt the Independent Inquiry into Child Sexual Abuse's definition of an 'organised network' as a definition of group-based child sexual exploitation. Or they should devise and implement a suitable alternative.

**Force response: This recommendation is for the Home Office, the Department for Education, the Welsh Government, the National Crime Agency, the National Police Chiefs' Council and the College of Policing.**

**Recommendation 2**

By 31 December 2024, all chief constables should make sure that their forces have problem profiles for child sexual exploitation, each of which should include an assessment of the nature and extent of group-based child sexual exploitation. This should include relevant data from local partner agencies and should be updated frequently, at least annually.

**Force response: The Constabulary commissions operational Child Sexual Exploitation (CSE) problem-profiles which are produced by our intelligence analysts to specifically understand group-based offending methodologies, highlighting intelligence trends and geographic patterns and assessment. The recommendations emanating from this work are managed through force and partnership governance mechanisms including Prevention and Vulnerability Group, Missing and Child Exploitation (MACE) and Child Exploitation strategic meetings and the Safeguarding Executive and associated boards.**

**The analytical overview is continually refreshed and added to, through dedicated business as usual (BAU) processes and the fortnightly updates at a force level within our tasking and co-ordination group (TTCG).**

**Both of our Local Authority partners have a specialist child exploitation analyst who works closely with our force Intelligence and Specialist Crime Team ensuring data from a broad range of partners informs the problem profile and enhances data quality.**

**The problem profile works to the definition suggested within the report to ensure consistency in data harvesting from all agencies and therefore informing our strategic to operational responses in consistent approach across the organisation and partnership. It is augmented and supported by ToEX analytical products that harness and refine our own data and provide an additional analytical 'map' of our current and emerging areas of risk.**

**Through our dedicated Child Exploitation Hub, Intelligence and Specialist Crime Department which includes the management of serious organised crime (SOC) we collate, assimilate, action and track a series of measures to ensure our intelligence collection is enhanced, markers and flags are maximised and information from ongoing partnership meetings feeds into our organisational system to start positively influencing the throughput of data from which the problem-profile will be completed.**

**CSE is also subject of monthly analysis as part of the force TTCG process and annually through the production of the force's strategic assessment and serious organised crime profile consisting of both police and partner data to help understand the key threats and emerging issues from this crime type.**

**The force will ensure that problem profiles for CSE are produced and updated on an annual basis.**

### **Recommendation 3**

By 30 May 2025, the National Crime Agency should produce an assessment of group-based child sexual exploitation as part of its annual strategic assessment of serious and organised crime. The assessment should use the agreed definition of group-based child sexual exploitation from our recommendation 1.

**Force response: This recommendation is for the National Crime Agency.**

#### **Recommendation 4**

By 31 December 2024, all chief constables and the relevant business user groups for police record management systems should make sure there are sufficient measures in place to identify group-based child sexual exploitation.

**Force response: The Constabulary utilises a system named TuServ as the feeder into the ATHENA crime system. TuServ has CSE and CE marker options highlighted to officers to maximise use of these and enhance organisational understanding. The ATHENA user group will review the viability of an additional group based CSE marker.**

**As referenced above our mapping and analysis within problem profiles is assisted by our use of ToEX analysis and most recently by our uptake of the APMIS software and associated functionality. The latter provides considerable opportunities here. Not only is it able to ensure we have a clear, universally accessible means of categorising, linking and tracking all facets of group-based activity that we record but it also enables us to assess across departmental and thematic boundaries to ensure that CSE / CE and SOC / MSHT and other crime types are all 'linkable' and viewable within the same programmes and landscape.**

**Social Network Analysis, scanning and research is undertaken by our Intelligence and Specialist Crime Department to identify group based CSE and overlapping linked thematic crime types such as SOC, CE and MSHT. In June 2023 a new Child Exploitation Hub was formed dedicated to the identification of all forms of CE including both CSE and CCE, trafficking and group-based exploitation. The CE Hub is integrated within both our Protecting**

**Vulnerable People and Intelligence functions to ensure maximum analytical and partnership engagement and resource mobilisation.**

**Recommendation 5**

By 31 March 2025, the Home Office should stop collecting group-based child sexual exploitation data through its annual data requirement on custody, known as ADR149.

**Force response: This recommendation is for the Home Office.**

**Recommendation 6**

By 31 March 2026, the **Home Office** should introduce a new and specific annual data requirement on group-based child sexual exploitation. This should be aligned with its existing child sexual abuse and exploitation crimes annual data requirement. The supporting guidance to forces should use the agreed definition of group-based child sexual exploitation from our recommendation 1.

**Force response: This recommendation is for the Home Office**

**Recommendation 7**

By 31 December 2024, the College of Policing should update its authorised professional practice on child sexual exploitation to include group-based child sexual exploitation. It should use the agreed definition from our recommendation 1.

**Force response: This recommendation is for the College of Policing.**

**Recommendation 8**

By 30 June 2024, all chief constables of forces that are yet to receive the Hydrant Programme's continuing professional development offer should arrange it.

**Force response: The Constabulary contacted Op Hydrant in December 2023 and this offer is currently being progressed.**

**Recommendation 9**

With immediate effect, all chief constables should take effective steps to eradicate victim-blaming language in their forces.

**Force response: The Children's Society "Child Exploitation Language Guide" has been circulated to all officers and forms part of ongoing vulnerability training across the organisation.**

**We will conduct regular auditing of incidents and crimes across CSE and other associated vulnerability areas with feedback provided at operational level and thematic reporting through strategic governance.**

**Our organisational culture statement is reflective of this recommendation through realisation of our values and creating an environment where respectful challenge of ourselves and partners is expected to ensure we continuously improve.**

**In May 2024 we are launching force wide Trauma Informed Training which will upskill the workforce on understanding the trauma that affects victims and witnesses of crime and the impact of conscious and unconscious bias. This is supported by our adoption in 2022 of a comprehensive 4-pillar VAWG strategy. Within this we have a specific focus on creating a victim-centric and offender focused investigative approach in all, but especially rape and serious sexual offences (RASSO), this has included additional attitudinal training for officers and the introduction of a rape victim feedback panel to assess officer attitudes and performance.**

**The Constabulary is embarking on consultation with and undertaking regular feedback from young person's groups around the use of language. This has included rapid debrief of communications and influence in policy language.**

#### **Area for improvement 1**

All chief constables should work with their statutory safeguarding partners to review, promote and make sure that relevant group-based child sexual exploitation disruption and prevention initiatives are implemented effectively in their forces. This

should include consideration of options such as the advice given in the Home Office disruption toolkit and an Operation Makesafe (a national police initiative to raise awareness of child sexual exploitation in the business community) type of approach.

**Force response: This is already in progress within the partnership from strategic to operational level, through both Police and partnership structures, and collaborative, multi-agency meetings. Group Based CSE offending has been added to the countywide CE Strategic Plan 2024-2026 ensuring specific focus and accountability across the partnership. As referenced above, we have a strong structural mechanism to deliver this through the establishment of the CE Hub and the connected MACE meetings that give a tactical and operational focus and forum for the partnership strategic thinking around group based CSE.**

**Operation Makesafe is an initiative well-established and used within Cambridgeshire.**

**The Constabulary has extended its Businesses Against Abuse model to include a broad range of community-based businesses to create, embed and co-ordinate a community-based safeguarding and intelligence response.**

**Through our dedicated prevention strategy and Partnership and Prevention department, we apply a multi-agency problem-solving approach to prevention, disruption opportunities and civil options. This again is given an operational reality and momentum through our initiation of two locally based Prevention and Vulnerability Hubs; this provides a clear mechanism for reactive and proactive partnership working to address group based CSE through daily scanning and intervention to longer term problem solving and coordinated disruption. Additionally, we have a Clear, Hold, Build programme which utilises multi-agency and community-based approaches to hotspot locations.**

**Our strategic partnership within each of our six district Community Safety Partnership's supported cross partnership implementation of Makesafe principles specifically, overseen by locally chaired problem-solving groups.**