Office of the Police and Crime Commissioner
PO Box 688
PE29 9LA
Tel: 0300 333 3456
Email: Cambs-pcc@cambs.police.uk
Twitter: @PCCCambs

Rt Hon Shabana Mahmood MP
Home Secretary
2 Marsham Street
London
SW1P 4DF

8 December 2025

Dear Home Secretary

HMICFRS Report: Inspection of the effectiveness of police and law enforcement bodies' response to group-based child sexual exploitation: A progress report

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 'Inspection of the effectiveness of police and law enforcement bodies' response to group-based child sexual exploitation: A progress report'.

Both the Chief Constable and I welcome the publication of this report which aligns with what victims of serious violence told me when I was developing my Police and Crime Plan. Put simply they want to be confident that officers and staff have the skills and knowledge to respond to the crime they have experienced. One of the priorities in the 'Supporting Victims and Witnesses' pillar in my Plan makes a commitment to "hold the Chief Constable to account" for this. I receive regular updates at my Business Co-ordination Board from the Chief Constable and will

ensure any recommendations which are incomplete are appropriately monitored locally.

In Cambridgeshire and Peterborough victims of child sexual exploitation can access support from two specialist child/young person-focused services. The staff respond to the young person's needs ensuring support is bespoke and child-led. For example, Cambridge Rape Crisis has run several art-based support groups for young girls. The life-sized posters they created carry stark messages for institutions and victims alike, such as: "No I will not be quiet" and "Your silence won't protect you".

I am committed to ensuring the voices of victims and witnesses inform the commissioning of such services. More than 125 young people responded to a recent survey and told us how they would want to access support if they became a victim or witness of crime. In Cambridgeshire and Peterborough, we have also run an innovative engagement project to capture the voices of survivors of sexual violence. This graphically facilitated work called 'Engage Visually' has enabled us to better understand what a positive help seeking experience looks like, and where any blockages exist in the wider system.

I hope this response, and that of the Chief Constable, provides reassurance regarding the commitment of both myself, and Cambridgeshire Constabulary to providing an effective policing and wider victim support response to group-based child sexual exploitation.

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

Yours sincerely



Darryl Preston
Police and Crime Commissioner for Cambridgeshire and Peterborough

Enc - Appendix 1 – Cambridgeshire Constabulary's response to HMICFRS report 'Inspection of the effectiveness of police and law enforcement bodies' response to group-based child sexual exploitation: A progress report'.

Appendix 1

Cambridgeshire Constabulary's response to HMICFRS report 'Inspection of the effectiveness of police and law enforcement bodies' response to group-based child sexual exploitation: A progress report'.

Recommendations

Within their 2023 report, HMICFRS made 9 recommendations and 1 area for improvement. Of those recommendations, they consider 2 to have been completed, 3 are in progress and the remaining 4 are incomplete, requiring further action. Of the outstanding recommendations from 2023, **2** relate to all Police forces in England and Wales. HMICFRS have closed the AFI.

Within the 2025 report HMICFRS made 6 recommendations, 4 of which are for Police forces in England and Wales.

1. **Response to recommendations from 2023 report**

   Recommendation 1 – incomplete

   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.

   Constabulary Response:

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

   Recommendation 2 – incomplete

   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.

Constabulary Response:

Cambridgeshire Constabulary have commissioned a new child sexual exploitation problem profile in March 2025 which has been used across the organisation to influence operational and partnership activity. This problem profile will be refreshed annually as part of a rolling programme to ensure our countywide responses are indicative of the most up to date holistic data. Cambridgeshire Constabulary and statutory partners continue to work to build a common data platform to facilitate information sharing enabling an extensive profile that facilitates shared prevention, disruption, and safeguarding responses.

The analytical work is reviewed and refreshed monthly at the force tactical tasking co-ordination group which links into other internal governance at local policing level and across the safeguarding partnership, specifically the Child Exploitation Strategic Group which connects workstreams across the county including Community Safety Partnerships.

Recommendation 3 – in progress

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.

Constabulary Response:

This recommendation is for the National Crime Agency.

Recommendation 4 – incomplete

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.

Constabulary Response:

Cambridgeshire Constabulary continue to identify mechanisms through crime and intelligence recording systems to ensure there are sufficient measures. This included reviewing availability and use of appropriate flags and markers, but this is subject to ongoing discussion at system user groups across the consortium of forces which use the Athena system.

Cambridgeshire Constabulary continue to be proactive in intelligence-led mapping and analysis to link not only group based CSE, but it's natural overlaps into other Serious Organised Crime such as MSHT and criminal exploitation. This enables us to associate internal and partnership structures to support this such as use of APMIS and dedicated Local Responsible Oweners (Detective Chief Inspectors and Detective Inspectors) to oversee prevention, preparation of the workforce, pursuing offenders and protecting survivors and victims.

Recommendation 5 – incomplete

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.

Constabulary Response:

This recommendation is for the Home Office.

Recommendation 6 – in progress

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.

Constabulary Response:

This recommendation is for the Home Office.

Recommendation 7 – in progress

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. And it should use the agreed definition from our recommendation 1.

Constabulary Response:
This recommendation is for the College of Policing.

Recommendation 8 – completed
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.

Constabulary Response:
This recommendation is complete

Recommendation 9 – completed
With immediate effect, all chief constables should take effective steps to eradicate victim-blaming language in their forces.

Constabulary Response:
This recommendation is complete.

Area for Improvement - closed
All chief constables should work with their statutory safeguarding partners to review, promote and make sure 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 child exploitation disruption toolkit and an Operation Makesafe (a national police initiative to raise awareness of child sexual exploitation in the business community) type of approach.

Constabulary Response:
This area for improvement is closed.

2. Response to recommendations from 2025 report

Recommendation 1

By 31 March 2026, the Home Office, Department for Education and all police forces and law enforcement bodies that are yet to do so should adopt the Independent Inquiry into Child Sexual Abuse's definition of an 'organised network' as a definition of group-based child sexual exploitation. And they should make sure they use this definition in all relevant policies, training products, procedures and guidance.

Constabulary Response:

Cambridgeshire Constabulary has fully adopted the definition of an organised network. This definition will be the basis of all forward-facing intelligence and investigative responses to ensure consistency locally, across the partnership and ensure Cambridgeshire Constabulary's data feed supports the ongoing national network analysis. Our problem profile completed in March 2025 utilised this definition and therefore we have a platform to make accurate comparisons to intelligently identify emerging risks and trends, and therefore assign resources, disrupt offenders, provide continuous training and engage the countywide network of specialists and partners.

Cambridgeshire Constabulary will undertake a wholesale review of our processes and policies to ensure complete transition to the national definition alongside a comprehensive communications strategy across the organisation and partnership for consistency ensuring end-to-end processes are reflective and responsive.

Recommendation 2

By 31 March 2026, all police forces should fully adopt and use the Hydrant Programme's child sexual exploitation problem profile template as a minimum when preparing their 2025/26 child sexual exploitation problem profiles.

Constabulary Response:

Cambridgeshire Constabulary will adopt and use the Operation Hydrant child sexual exploitation problem profile template. The annual iteration of the profile is due to be completed by March 2026 which will follow the template and associated

guidance. The template has been shared with our intelligence analysts who will begin preparation for its use including the use of associated partnership data to inform a holistic and contextual profile which will be shared across the multi-agency network for co-produced solutions to prevent, safeguard and disrupt offending within our communities.

Recommendation 3

By 31 March 2026, the Hydrant Programme should develop quality assurance guidance for all police forces so they can accurately and efficiently identify child sexual exploitation and group-based child sexual exploitation in their child protection and abuse investigation data returns and police record management systems.

Constabulary Response:

This recommendation is for the Hydrant Programme.

Recommendation 4

By 31 July 2026, all chief constables should use the Hydrant Programme's guidance so forces can efficiently and accurately identify child sexual exploitation and group-based child sexual exploitation in their police record management systems.

Constabulary Response:

Cambridgeshire Constabulary actively utilises Operation Hydrant guidance. Specifically, the guidance has tactically delivered:

- Training to Police Officers, Police Staff and multi-agency colleagues on child sexual exploitation to increase knowledge and awareness, provide an overview of investigative good practice and talk through developments in policy and practice. This included a case study to encourage embedding of the learning. Further professional development days are planned.
- Peer support to senior detectives who lead serious and complex child sexual exploitation investigations enabling a wraparound response that

ensures best practice is followed and providing guidance to achieve positive outcomes for survivors and communities.

- Feedback on self-assessment processes to ensure our processes, policies and forward planning are aligned to national best practice and emerging innovation across the country.

The support Operation Hydrant has provided has improved our organisational knowledge, enabling strategic responses via changes to policy through to operational improvements in investigative capability, victim care and support, intelligence collection strands and crime recording. This will seamlessly integrate into our continuous analysis and problem profiling, establishing a feedback loop that ensures ongoing evaluation of Operation Hydrant's support and promotes continuous improvement.

Recommendation 5

By 31 December 2026, the National Police Chiefs' Council, the Hydrant Programme and the Home Office should work together to create and implement a robust and reliable method of identifying and collecting all child sexual exploitation data, including group-based child sexual exploitation data, in police record management systems.

Constabulary Response:

This recommendation is for the National Police Chiefs' Council, the Hydrant Programme and the Home Office.

Recommendation 6

By 31 July 2026, all police forces should devise a strategy to implement Operation Makesafe consistently and include this in their child sexual exploitation data returns to the Hydrant Programme. This strategy should include the adoption and use of the rebranded Operation Makesafe police and partnership marketing materials.

Constabulary Response:

Operation Makesafe continues to be an active part of the portfolio used to combat child sexual exploitation across Cambridgeshire through engagement with the

business community. It is recognised that as the nature of child sexual exploitation changes and our understanding of the context within the county improves, that our Operation Makesafe response requires refreshing to ensure it remains a proactive and preventative tool. We will develop, communicate, and embed an Operation Makesafe strategy utilising the full range of Operation Hydrant material to ensure best practice is actively reflected across internal and partnership oversight of the associated tactical and operational delivery. Governance of this strategy will sit within Tactical Tasking Co-ordination Groups and the partnership Child Exploitation Strategic Group ensuring operationally, that hotspot locations are subject to 'risk outside the home' pathway referrals for robust activity and intervention across a range of multi-agency partners.

Furthermore, this strategy will extend its reach into the wider business community, building on the success of the countywide 'Businesses Against Abuse' initiative. By fostering a problem-solving partnership, we aim to empower the community to recognise and prevent harm, and to provide the Police with timely intelligence that maximises enforcement opportunities.