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

10 June 2026

Dear Home Secretary,

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

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

Both the Chief Constable and I welcome the publication of this report. The Chief Constable's response to the recommendations is shown at Appendix 1.

Within my remit as Police and Crime Commissioner I will be considering the Chief Constable's response at my next Police Accountability Board.

Yours sincerely



Darryl Preston
Police and Crime Commissioner for Cambridgeshire and Peterborough

Enc - Appendix 1 – Cambridgeshire Constabulary's response to HMICFRS report 'The policing response to the investigation of online child sexual abuse and the management of registered sex offenders.'

Appendix 1

Cambridgeshire Constabulary's response to HMICFRS report 'The policing response to the investigation of online child sexual abuse and the management of registered sex offenders.'

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.

Constabulary's response to recommendation 1

Within Cambridgeshire Constabulary the Kent internet risk assessment tool (KIRAT) is used for all offences relating to indecent images of children (IIOC) where the suspect is a male and over 18, which is the appropriate use of KIRAT. The national prioritisation tool is used for all child and adult suspects linked to investigations managed by the Online Child Abuse Safeguarding Team (OCAST).

The KIRAT and prioritisation tool are consistently used to identify risk and inform prioritisation of investigations, based against mapped risk. The risk is reviewed post enforcement and captured in monthly supervisory reviews to ensure continued risk assessment through the life cycle of the investigation.

If an OCAST investigation falls outside of the nationally agreed timescales, associated with the prioritisation tool, this investigation will be subject to a supervisory review which will task a proportionate review of force systems to assess

if there is any change or escalation of risk which will also escalate any enforcement plans as appropriate based on any change in risk.

Currently the OCAST are the only force investigation team that use the national prioritisation tool, this requires further work within the force and wider training will be required to ensure other force investigation functions can consistently apply this tool and track investigations so to be compliant with associated timescales. College Of Policing Authorised Professional Practice (APP) principles of risk management are adopted and used by teams outside of OCAST, which currently do not use KIRAT.

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.

Constabulary's response to recommendation 2

OCAST workloads and capacity are subject to scrutiny through a number of force governance structures as outlined below:

- Monthly Intelligence and Specialist Crime Department (ISCD) senior leadership team meetings – chaired by Director of Intelligence
- Monthly force Child Protection meetings – chaired by Head of Crime and Vulnerability
- Force Business Assurance Meeting – chaired by the Deputy Chief Constable

Through these governance structures the force has reviewed the profile of OCAST staffing based against known and predicted increases in demand. This is evidenced by officers being seconded into the OCAST to cover significant maternity related absences over 2025 and 2026. In early 2026 ISCD conducted an internal Strategic Threat and Risk Assessment (STRA) process. This repurposed several vacant posts within ISCD and resulted in the OCAST receiving two additional constable posts and the reallocation of sextortion offences into the Economic and Cyber Crime Unit (ECCU). This internal ISCD STRA also created additional posts within the Digital Forensic Unit (DFU) with an additional supervisor and an additional Digital Forensic

Examiner (DFE). These posts will support the DFU manage increased demand from the OCAST and ensure OCAST, and wider force investigations, have DFU support and are progressed efficiently.

ISCD and force tactical meetings have also secured additional resources to support OCAST during periods of peak demand. In late 2025 wider ISCD (CIB / SOCT and ECCU) resources supported OCAST for six weeks to enhance enforcement capability. Wider force resources were secured over February 2026 through a bid to force Tactical Tasking and Coordination Group. In April 26 further ISCD (SOCT, CIB, ECCU and analysts) resources were seconded for five weeks to support the OCAST progress a complex and challenging community online (COM) network investigation (Op Magdalene).
National Crime Agency (NCA) coordinated NCMEC (National Centre for Missing Exploited Children) referrals are now expected to rise again over the coming 12 to 18 months demonstrating a massive increase in demand compared to data from 2023 and a near doubling of demand in 2027 compared to 2025. Historic and predicted referral levels for Cambridgeshire are outlined below:

- 2023 – 142
- 2024 – 313
- 2025 – 483
- 2026 – Predicted – 477 to 550
- 2027 – Predicted – 738 to 953

The Constabulary is reviewing resource requirements in light of the anticipated increase in demand, through its annual business process CamSTRA.

Recommendation 3 – for the College of Policing
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.

Constabulary's response to recommendation 4

The starting point for enforcement against all OCAST suspects will be arrest plus application of appropriate and proportionate bail conditions. This is the starting consideration and will be reviewed based on a range of factors such as suspects age, suspects vulnerabilities and the results of on scene triage of devices. On a case-by-case basis, these factors may identify that a voluntary interview is more appropriate and proportionate than arrest and bail.

The increase in referrals and OCAST workloads previously outlined means that there are greater number of investigations with subjects on bail and this increases the demand on OCAST. Proactive bail checks are conducted by the relevant officer in charge (OIC) and OCAST officers, based on known risk or based on other contact with the subject or their family indicating a potential breach of bail conditions. Where no such concerns exist, support from wider policing teams is sought for checks. Outcomes of bail checks are recorded in Athena investigation notes, including date and time. National discussions highlight challenges in meeting bail compliance, and options are being explored to improve effectiveness, including expansion of the OCAST team.

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.

Constabulary's response to recommendation 5

OCAST signpost families of online child sexual abuse suspects to third party provision, this is via discreet cards with QR codes to access relevant third-party support. OCAST managers are now actively scoping a project to secure third-party provision for families of online child sexual abuse suspects. Engagement is taking place with local / national providers and Proceeds of Crime Act (POCA) funding will be sought to develop a proof-of-concept approach to pilot this provision.

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.

Constabulary's response to recommendation 6

The Constabulary has completed a comprehensive review of its operating model, governance framework and data arrangements for the management of registered sex offenders, with a particular focus on consistency, compliance with Home Office standards and accurate risk representation on the Violent and Sex Offender Register (ViSOR) having worked through and completed a local operational improvement delivery plan.

A refreshed governance structure is now fully embedded, with Management of Sexual Offenders and Violent Offenders (MOSOVO) performance and compliance subject to routine scrutiny through Protecting Vulnerable People Senior Leadership Team, Violence Against Women and Girls (VAWG) Governance Group and the Constabulary`s performance management governance structure. A formalised performance framework, supported by defined Key Performance Questions (KPQs) and Key Performance Indicators (KPIs), ensures consistent oversight across both geographical teams and supervisory tiers. Monthly data packs are produced and

reviewed, along with monthly tactical performance meetings between DCI and DI to assess risk, demand and compliance with national standards. These data packs form the basis of updates at above-mentioned governance meetings.

The Constabulary has strengthened its approach to data collection and assurance. All MOSOVO activity, including Active Risk Management System (ARMS) assessments, risk management plans and visits, is recorded on ViSOR as the single source of truth. Data harvested from ViSOR is cross-referenced with locally captured management information (via Microsoft Forms and Power BI dashboards) to ensure accuracy, consistency and transparency. This approach enables accurate assessment of individual and thematic risk and supports supervisory challenge and escalation where required.

Internal audit processes, aligned to HMICFRS audit methodology, have been embedded to quality-assure ViSOR records, Active Risk Management System (ARMS) assessments, Risk Management Plans (RMPs) and supervisory sign-off. In addition, the Constabulary is leading a regional peer review programme with neighbouring forces to provide independent qualitative assessment of risk management practice, further strengthening consistency and learning. The constabulary is also actively exploring AI solutions to assist in freeing up officer capacity to deal with projected increases in demand linked to the Gauke sentencing review and the projected OCAST increase in demand in future years linked to NCA intelligence product.

Recommendation 7 – for the Home Office

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.

Constabulary's response to recommendation 8

The Constabulary has undertaken detailed analysis of historic and emerging demand within MOSOVO to inform workforce planning and sustainability. Demand trends, offender growth and risk profiles are reviewed as part of routine horizon-scanning, with findings feeding directly into CamSTRA submissions and force-level resourcing discussions to ensure sufficient offender managers and supervisory capacity over the medium to long term.

Abstractions within MOSOVO are now formally recorded, reviewed and governed. Daily and bi-weekly performance meetings provide visibility of abstractions and their impact, with mitigation plans enacted through Protecting Vulnerable People (PVP) tasking where necessary. This ensures abstractions do not become routine and do not adversely affect workload completion or risk management outcomes.

Outstanding ARMS assessments, risk management plans and visits are actively monitored and prioritised by both risk level and age of visit. Escalation trigger points are clearly defined and embedded, with structured escalation through DI, DCI and Detective Superintendent thresholds to ensure senior oversight and timely

intervention. These arrangements provide clear assurance that risk is identified, understood and managed proportionately.

Supervisory reviews are now subject to defined timeliness standards, with compliance monitored through the performance framework. Bi-weekly reviews ensure that ARMS assessments, RMPs and visit records are reviewed promptly and within one month, and this remains a standing focus within governance and audit activity.

Recommendation 9 – For the Home Office, College of Policing and National Police Chiefs' Council

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.

Constabulary's response to recommendation 10

The Constabulary has mandated compliance with College of Policing Authorised Professional Practice for MOSOVO visits. All home visits are now conducted unannounced and double-crewed as standard. This requirement has been embedded since January 2024 and is subject to ongoing daily, weekly and monthly assurance through supervisory checks, audits and governance reporting. Compliance has consistently been demonstrated through dip-sampling and audit activity.

Any visit that does not comply with APP must be formally authorised. The rationale for such decisions is recorded on ViSOR, and these exceptions are subject to supervisory scrutiny and inclusion within audit processes to ensure transparency and defensible decision-making.

The Constabulary has clarified and reinforced the criteria for reactively managed registered sex offenders to ensure compliance with APP. Supervisors provide enhanced oversight of decision-making and risk rationales during 1-2-1s and supervisory sign-off processes, ensuring that reactive management is appropriate, justified and time-limited.

Police National Database (PND) and broader intelligence checks on registered sex offenders are now tracked and audited as part of the MOSOVO audit framework. ViSOR records are scrutinised to ensure breadth of checks is recorded and completed, with findings feeding into performance governance and continuous improvement activity.

Recommendation 11 – For the College of Policing and National Police Chiefs' Council

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 – For the College of Policing

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 – For the College of Policing and National Police Chiefs' Council

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 – For the National Police Chiefs' Council and College of Policing

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.

Constabulary's response to recommendation 15

Psychological health screening is now mandatory for MOSOVO and online child sexual abuse and exploitation team members and supervisors, with annual screening delivered in line with National Police Wellbeing Service guidance. Screening outcomes are reviewed with Occupational Health and Wellbeing Unit partners to identify emerging trends and ensure access to follow-on support where required.

The Constabulary has embedded a comprehensive wellbeing governance framework, including mandatory welfare discussions within 1-2-1s, annual wellbeing reviews and the use of Pause Point assessments as a preventative welfare tool. Supervisors receive regular inputs on trauma-informed leadership and are supported to identify signs of burnout, secondary trauma and wellbeing risk.

CambsCARE will go live in the autumn of 2026 - this is a bespoke, embedded Welfare Officer programme that will support all officers and staff but particularly those in high risk roles such as OCAST and MOSOVO and ensure they have diarised 6-monthly appointments with advocates who will provide debriefing, talking therapy support for trauma and work related stress and signpost and facilitate onward clinical support where necessary.

Learning, training and knowledge sharing are reinforced through Continuous Professional Development (CPD) days, wellbeing inputs from force leads and access to national investigator resilience programmes. These arrangements provide supervisors with the confidence and pathways required to refer staff promptly for support and treatment when concerns are identified.

Engagement is now ongoing with Occupational Health Unit leads to broaden this provision to wider functions which may be exposed to harmful content when supporting OCAST investigations, namely COM networks. At present there is no

formal / recognised trauma informed training delivered to OCAST supervisors. The Director of Intelligence is working with force Wellbeing leads to develop a pilot, which will secure the training of ten ISCD officers to be Mental Health First Aiders. This is an accredited course run by Mental Health England and additional POCA funding will be sought if this pilot is appropriate once fully researched and evaluated. Trauma Risk Management (TRiM) operates within Cambridgeshire and all OCAST and MOSOVO staff know how to access it. The force also has a dedicated Wellbeing SharePoint site containing links for support, including psychological therapies and Employee Assistance Programme (EAP).

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.

Constabulary's response to recommendation 16

The Constabulary has strengthened partnership governance with the Probation Service through clear structures and escalation pathways, ensuring effective joint working in the management of registered sex offenders and Multi-Agency Public Protection Arrangements (MAPPA) nominals. MOSOVO routinely engages with probation colleagues through joint visits, information sharing and performance discussions.

Arrangements now include a two-way feedback and escalation process to identify gaps, challenge practice and address safeguarding risks proactively. This approach ensures opportunities to safeguard are identified and acted upon, with learning captured through governance and fed back into operational practice.

OCAST related overview assessment

The release of the HMICFRS report coincided with the bi-annual review and refresh of the OCAST policy, which is now being refreshed so to incorporate and reflect the recommendations covered within this paper. OCAST managers and supervisors are

aware of these recommendations and will monitor compliance with these at an operational level and alignment with the refreshed OCAST policy.
The HMICFRS paper and associated recommendations have also been presented and discussed at the force Child Protection meeting.
There are strategic and tactical awareness of the recommendations and clear governance and scrutiny in place to monitor compliance with the recommendations and associated deadlines.
Performance changes as a result of these activities will continue to be monitored at departmental and ACC level, while the DCC-Chaired Quality Targeting and Testing (QTT) meeting will continued to review the impact on risk levels and ensure changes are embedded across the force.

OCAST managers are well connected within the national Paedophile Online Investigation Team (POLIT) network and will continue to use this network for peer support and organisational learning so to ensure continued compliance with HMICFRS recommendations and adoption of recognised good practice.