

21 September 2023

Dear HMICFRS

I acknowledge that the His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) team published on the 05 April 2023 – An inspection of how well the police and National Crime Agency tackle the online sexual abuse and exploitation of children.

Bedfordshire Office of the Police and Crime Commissioner notes that HMICFRS have made 17 recommendations, to the police and other partners, which are intended to:

- reduce the amount of child sexual abuse material on the internet;
- provide better guidance and training to those who investigate online child sexual abuse and exploitation;
- improve investigations into those who are a risk to children; and
- better protect and support children who have been sexually abused, or who are at risk of sexual abuse and exploitation.

In this report specifically you made the following 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 Requirement.

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

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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.

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.

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.

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.

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
- 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

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Project to assess the feasibility of including online child sexual abuse and exploitation cases in it.

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.

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.

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 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.

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.

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Recommendation 13

With immediate effect, chief constables should satisfy themselves that their crime allocation policies make sure online child sexual abuse and exploitation cases are allocated to those with the necessary skills and training to investigate them.

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.

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 returning cases to the NCA when forces establish that the case needs NCA capabilities to investigate it.

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.

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.

Bedfordshire Police have provided a full comprehensive update to the office of the police and crime commissioner and are assured with work being completed in this area of business. Recommendations will continue to be monitored through our governance board meetings.

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Yours Sincerely

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