

The policing response to the investigation of online child sexual abuse and the management of registered sex offenders: PEEL spotlight report. Response from Simon Foster, Police and Crime Commissioner for the West Midlands.

The spotlight report from His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) was published on the 15th of April 2026. It reviews the findings related to the investigation of online child sexual abuse and the management of registered sex offenders from 2021/22 and 2023/25 Police Effectiveness, Efficiency and Legitimacy (PEEL) inspections and identifies areas where police forces could further improve as well as areas of positive practice.

The investigation of online child sexual abuse and the management of registered sex offenders involves dealing with high-risk perpetrators. The inspectorate found that demand on police forces in these high-risk areas of policing is not only increasing but is exceeding resources. HMICFRS proposed that police forces and national bodies such as the College of Policing, National Police Chiefs' Council and the Home Office need to invest in this area of policing to ensure resources can meet demand. Specifically, targeted investment in research to inform operational practice, technology, and the workforce to make sure police forces have enough well-trained and supported personnel to effectively investigate complex crimes.

The spotlight report led to sixteen recommendations in total, nine of which require action by Chief Constables. The recommendations concentrate on improvements in governance and performance, capacity and capability and staff and officer well-being, as well as the use of technology and partnership working. The aim is to improve the standards and quality of investigations into online child sexual exploitation and the supervision of registered sex offenders.

Report Recommendations

'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'**

West Midlands Police (WMP) use the Kent Internet Risk Assessment tool to assess and prioritise referrals relating to online child sexual abuse investigations, identifying enforcement opportunities, safeguarding concerns and to inform submitting further referrals to other agencies without delay. WMP have regular supervisory reviews, and the Kent Internet Risk Assessment tool timescales are monitored through governance arrangements, such as monthly performance meetings. Positively, WMP have complied with Kent Internet Risk Assessment tool requirements, and this has been maintained over the last 12 months. Online child sexual abuse investigations which are managed outside of the Online Child Sexual Exploitation (OCSET) team, allocated to the main Child Abuse Investigation Teams, have OCSET oversight to ensure adherence to performance standards.

'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'

The inspectorate found throughout the report findings that many police forces did not have enough police officers and staff, even after it being highlighted that their staffing models were insufficient in prior related inspections. Not having enough police officers and staff with the skills needed can lead to missed safeguarding opportunities. I understand that staffing levels within the OCSET team have recently been reviewed in WMP and led to a permanent uplift of personnel within the team. In addition, progressively the team is currently working within a manageable workload. As a result, the team is now operating within a sustainable and manageable workload.

'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'**

In terms of custody procedures, WMP already consider arrests and bail in all OCSET investigations. Where an arrest is not made, this decision is documented and ratified within the investigation report, conditional bail is also used. The suitability of bail and the applied conditions are considered as part of the monthly reviews of the investigation. Currently, there is work in progress to create and implement a performance dashboard that will allow the local policing areas to identify bailed suspects and their conditions to assist

with local bail management. This approach ensures that suspect management remains both strictly accountable and monitorable across local policing teams.

‘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’

To successfully meet this requirement, WMP proactively signpost families affected by relations being arrested for OCSET offences for support. In addition, WMP submit Multi Agency Referral Forms if any vulnerabilities are identified relating to family members throughout investigations. Furthermore, there is additional progress with the development of another support service for families affected, and also the development of a welfare pack to provide standardised professional support information.

‘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’

Registered sex offender management is overseen through established governance and performance frameworks in WMP, with specific software used to record, monitor, and manage offenders in line with national Home Office standards. Performance, compliance, and risk are routinely reviewed through daily and monthly oversight processes, while risk assessments and management plans are subject to supervisory review. Information from partner agencies, intelligence and digital enquiries is incorporated to support the effective assessment and management of risk.

‘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’

I understand that the demand and capacity for the management of sexual and violent offenders are regularly reviewed to inform workforce planning and ensure resources remain aligned to current and predicted demand. The caseloads, abstractions, and performance for WMP are monitored through established governance processes, with action taken where risks or capacity pressures are identified. To complement this, performance reporting is used to oversee the completion of visits, risk assessments, and risk management plans, ensuring that outstanding activity is identified, prioritised and managed appropriately.

‘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’

This recommendation focuses on operational practice for home visits, WMP ensure that home visits to registered sex offenders are conducted in accordance with authorised professional practice, with visits undertaken unannounced wherever possible and by appropriately trained staff. Compliance is monitored through supervisory oversight, audits, and reviews. Police national database checks are incorporated into offender management processes, and any non-compliance is identified, recorded, and managed through established governance arrangements.

‘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’

In terms of the wellbeing of staff, WMP ensure that psychological screening is provided to staff involved in the management of sexual offenders and online child sexual abuse investigations, with access to occupational health, counselling and wellbeing support services where required. Trauma-informed training and wellbeing inputs are delivered through continuous professional development and dedicated wellbeing

forums, enabling supervisors and staff to recognise and respond to signs of trauma, burnout, and wellbeing concerns. Furthermore, governance arrangements are in place to promote staff wellbeing and ensure access to appropriate support. These combined measures demonstrate WMP's commitment to cultivate a resilient workforce capable of maintaining high-quality operational performance under concentrated psychological demands.

'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'

Currently, WMP has appropriate strategic oversight through the Integrated Offender Management Quarterly Performance Review which is chaired by an Assistant Chief Constable. Partnership strategic oversight is governed through a Strategic Management Board, jointly chaired by the WMP Head of Public Protection and Probation Head of National Security Unit.

In conclusion, this report highlights the need for improvements to the investigation of online child sexual abuse and the management of registered sex offenders. While challenges persist, the findings also demonstrate that meaningful progress has been achieved and WMP has already taken proactive steps to implement the inspectorate's recommendations.

The police force has established governance, performance, and wellbeing arrangements to support the effective management of sexual and violent offenders, with the use of national systems, supervisory oversight, workforce planning and regular performance monitoring, the force is able to assess risk, manage demand and maintain compliance with relevant Authorised Professional Practice. Ongoing review and continuous improvement activity will continue to strengthen service delivery and ensure WMP remains well positioned to meet current and future demand.

Yours faithfully,



Simon Foster

West Midlands Police and Crime Commissioner