

The Rt Hon Shabana Mahmood MP  
Home Secretary  
Home Office  
2 Marsham Street  
London

Our ref:TP/FC13

8 June 2026

Dear Home Secretary

**RE: The policing response to the investigation of online child sexual abuse and the management of registered sex offenders – Response to HMICFRS’ report**

Thank you for the opportunity to comment on this HMICFRS national thematic report.

There were nine recommendations affecting police forces, for which Suffolk Constabulary has provided a formal response. This response is attached and will also be published on my website.

The Constabulary has either implemented these recommendations or is actively working towards full implementation. Their update outlines the plans and reviews underway to ensure a robust and effective response to the investigation of online child sexual abuse and the management of registered sex offenders.

I will continue to monitor progress through the *Supporting Children and Young People and Managing Offenders and Reducing Reoffending* reports, which are presented at my Accountability and Performance Panels.

Yours sincerely



Tim Passmore, Police and Crime Commissioner for Suffolk



**Response to HMICFRS' report: [The policing response to the investigation of online child sexual abuse and the management of registered sex offenders](#), April 2026**

In April 2026, HMICFRS published the national thematic report into the teams dealing with online child sexual abuse and those managing sexual offenders. The inspectorates raised the issue that these teams are currently being considered and developed in isolation from each other despite being operationally interwoven. The report called for improvements across many fronts to be made for teams to keep pace with the increasing demand of online sexual offending.

The report made a total of 16 recommendations, nine of which were for police forces. The focus of these recommendations includes risk assessment, demand management, supervision, wellbeing and partnership working. Suffolk Constabulary accepts these recommendations and the constabulary's response to each are below.

**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 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.

*Suffolk Constabulary's response to each part of the recommendation is as follows:*

*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*

*Suffolk Constabulary ensures that all referrals are subject to assessment using the Kent Internet Risk Assessment Tool. This allows prioritisation of enforcement based on likelihood of the subject of the referral being a contact offender.*

*Review 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*

*Suffolk Constabulary's team that receives all online child sexual abuse and exploitation referrals (Internet Child Abuse Investigation Team; ICAIT) operate under a procedure that ensures the regular assessment of intelligence and risk. The procedure sets out an intelligence strategy requiring an assessment of intelligence at the point of receiving a referral. In cases where the Kent internet risk*

assessment tool score is such that enforcement is not undertaken immediately, the procedure mandates an updated assessment of intelligence be completed prior to enforcement activity. Updating the intelligence assessment is also required prior to any application to an Inspector, Superintendent or Magistrate to extend an Applicable Bail Period.

Make sure investigations allocated outside online child sexual abuse and exploitation teams remain under the team's management oversight, including a central escalation policy

There is careful management of the investigations that are allocated outside of ICAIT. These referrals first undergo a selection process whereby only those meeting specific criteria are deemed suitable for outside allocation. This is to ensure that the most appropriate referrals are dealt with by teams other than ICAIT. Furthermore, the allocation process happens only after ICAIT have completed the intelligence development work on the investigation. When investigations are allocated outside ICAIT, an allocation package is provided which includes an intelligence profile, guidance on enforcement, suspect welfare, and supervisory expectations. Additionally, there is always a named dedicated ICAIT officer for the investigation, the contact details for whom are provided as part of the allocation package. This enables the officer in charge to readily seek advice and discuss a digital strategy with ICAIT following enforcement activity. Investigations allocated out remain under ICAIT's management oversight whereby the ICAIT supervisor ensures compliance with the requirements. A review into the effectiveness of these arrangements has recently commenced and is being conducted in line with the timeframe set out in the recommendation.

## **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.

Suffolk Constabulary has recently commenced a review looking into how sufficient ICAIT resources are in respect to meeting their increasing demand. The review is focused on how existing ICAIT resources are allocated across the stages of the investigation lifecycle, looks to identify any process constraints or delays, and resilience and business continuity arrangements. In addition, this review is examining methods of recording key performance indicators and allocated caseloads, to ensure timely and accurate information is available. This review is set to be completed in accordance with the timeframe of the recommendation. This review is intended to support effective delivery of investigations and enable prompt escalation of any identified issues.

Furthermore, to address resourcing in ICAIT, as of May 2026, Suffolk Constabulary implemented a pilot which provides a Detective Inspector solely for ICAIT (an improvement on the previous structure in which one role of detective inspector was split between serving ICAIT and another team).

## **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.

Suffolk Constabulary's response to each part of the recommendation is as follows:

Review their online child sexual abuse procedures and make sure that arrest and bail is considered and recorded for all suspects

*The procedure followed in ICAIT sets out that arrest and bail are always to be primarily considered, with proportionality and necessities of a lawful arrest according to statutory powers of arrest being considered on a case-by-case basis, including cases involving juvenile suspects. The procedure stipulates that decisions regarding the arrest or otherwise of a suspect must be recorded on investigation records.*

Make sure that when online child sexual abuse suspects are on bail, conditions are proactively checked at least once per applicable bail period

*At present, officers make contact with the suspect on a regular basis to identify new information and any changes in risk, including discussing compliance with bail conditions. The Constabulary is actively reviewing its processes to ensure robust and proactive monitoring of conditions is in place, in accordance with the timeframe of the recommendation.*

### **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.

*Signposting literature of family support services are currently being provided where appropriate. The Constabulary is reviewing its process by the recommendation's timeline, to improve the support of families through a third-party provision including signposting the contact details of support organisations.*

### **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.

*Suffolk Constabulary's response to each part of the recommendation is as follows:*

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

*Suffolk Constabulary ensures that all risk assessments and risk management plans are compliant with the Authorised Professional Practice, documented on and closely monitored through the Violent and Sex Offender Register, and regularly and intrusively reviewed by management. A review is taking place*

*to ensure the Constabulary remains compliant with Home Office standards, amending policy and process to keep up with latest changes in standards, as per the timeline of the recommendation.*

*The Violent and Sex Offender Register is used comprehensively; with all visits scheduled in via this system, which facilitates management oversight on compliance and resources. The Public Protection Unit staff actively use all functions of the Violent and Sex Offender Register, with confidence and capability amongst staff ensured through timely training and dedicated administrators for the Violent and Sex Offender Register to ensure compliance with data and system updates.*

*Consistency of approach to managing registered sex offenders is facilitated through ensuring sufficient capacity and resilience in the force. The public protection unit has recently undergone an increase in establishment in officer roles, as well as an increase in location bases to improve efficiency of access. Standardisation is ensured through a central point of oversight by the Public Protection Unit manager, ensuring consistency in performance, delivery and risk management across all teams, spanning all location bases across Suffolk.*

*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.*

*The Public Protection Unit Manager collates a comprehensive data pack on a regular basis at both an individual staff level as well as thematic areas of business. This uses data from the Violent and Sex Offender Register and is triangulated with other data sources in the force to ensure accuracy. The data is used to inform individual performance and compliance and ensure standards are met and is reported to senior management team to identify trends, risks and concerns.*

## **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.

*Suffolk Constabulary's response to each part of the recommendation is as follows:*

*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*

*Suffolk Constabulary have used their organisational change team (which includes data analyst resources), to analyse historic demand trends, to predict yearly change in registered sex offenders,*

*which informed significant staffing increases to keep up with managing demand. Suffolk Constabulary examine a variety of data trends to predict future demand, including local and national trends of registered sex offenders, mapping data about new registered sex offenders identified through ICAIT for online offences, and active engagement with probation services to monitor where additional registered sex offenders will be managed in the community and how this affects workload.*

*In terms of ensuring there are enough offender managers and supervisors to manage this demand, individual performance data is monitored comprehensively on a monthly basis to ensure workloads remain manageable.*

*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*

*Suffolk Constabulary has put robust measures in place that ensure that, due to the risk that they are managing, teams that manage sexual and violent offenders are protected from being abstracted to support other areas of business. This means they cannot be used as contingency for front line delivery in the event of service disruption. The force has built in resilience to ensure that additional supervisors and officers with the relevant specialist skills are available to support the public protection unit. A High Harm Team was established in January 2026 to provide resilience to the Public Protection Unit at the managerial level.*

*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*

*Comprehensive workload management reviews are conducted to ensure manageable workloads. This involves performance data being regularly and closely reviewed by supervisors, with an escalation process in place to the public protection manager. These reviews take into consideration the deadlines, risk level and volumes to inform demand level and appropriately manage and allocate workload.*

*Make sure that supervisors are completing reviews of active risk management systems assessments, risk management plans and visits promptly and within one month.*

*Suffolk Constabulary confirms that supervisors are reviewing active risk management systems assessments, risk management plans and visits, and aim to complete these reviews within one month. A review is currently being completed to improve supervisory risk management and capacity to keep up with supervisory demand, due to be completed in time with the recommendation timeframe. The Authorised Professional Practice suggests a ratio of one supervisor to a maximum of ten public protection officers, which Suffolk Constabulary are comfortably meeting across all public protection supervisors.*

*Over and above the supervisory reviews, other processes are in place to monitor and give feedback to the public protection officers on their work. Firstly, the public protection unit manager regularly reviews the records on the Violent and Sex Offender Register, to ensure compliance and quality. Furthermore, as part of the Seven Force collaboration peer review process, every quarter, two of the force's Active Risk Management Systems assessment/risk management plans are reviewed by managers against the national framework. From this process, bespoke feedback is given the public protection officer, and wider learnings are shared with the team and held on record. Furthermore, the*

*regional public protection managers forum is utilised to access and share best practice guidance and support.*

## **Recommendation 10**

By 31 October 2026, forces should make sure that:

- Home visits are unannounced and carried out in pairs to comply with the 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.

*Suffolk Constabulary's response to each part of the recommendation is as follows:*

*Home visits are unannounced and carried out in pairs to comply with the authorised professional practice for the management of sexual offenders and violent offenders and;*

*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*

*As per the authorised professional practice, all home visits to registered sex offenders are conducted in pairs. They are unannounced unless there are reasonable grounds not to, which is discussed with the supervisor and rationale is recorded as such. If this is the case, additional visits are scheduled and checked by a supervisor before signing off, which is all documented on the Violent and Sex Offender Register.*

*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*

*Suffolk Constabulary is currently conducting a review on policies and processes to ensure compliance with the conditions set out in the authorised professional practice with regards to reactive management. This is being completed in line with the timeframe set out in the recommendation.*

*They carry out and assess Police National Database checks on registered sex offenders.*

*Public protection officers conduct recurring intelligence checks on registered sex offenders in reactive management, using Police National Database, as well as various other national and local systems. Suffolk Constabulary also have a streamlined process in place to ensure public protection officers are aware of all relevant intelligence, whereby public protection officers are notified on the crime recording system for awareness of all relevant arrests/intelligence. Robust and regular intelligence checks ensure public protection officers stay abreast with intelligence.*

## **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.

*The force's wellbeing team regularly offer events for wellbeing-related education, which it looks to mandate to ensure access for all. Furthermore, as per the Police Wellbeing Check In Framework, managers and supervisors are supported and empowered to have structured, and supportive conversations with officers and staff about wellbeing. All public protection officers have access to yearly psychological screening; it is mandated that managers nominate every member of the teams every year to ensure all have been given access and opportunity. Wellbeing is discussed at monthly public protection unit meetings, as well as in individual one-to-one meetings, and teams have access to a departmental wellbeing group.*

## **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.

*There is a full service level agreement under the Multi Agency Public Protection Arrangements (MAPPA), with all statutory partners and key stakeholders, including the Probation Service. Suffolk Constabulary share a strong reciprocal relationship with the Probation Service, with a shared office space between the public protection teams and the Probation Service to improve professional relationships and information sharing. There is clear escalation process, for example, to address delays in transfer, these processes are in place and followed to ensure safeguarding is not missed. Mechanisms are in place to monitor and manage the transfer of offenders from probation to the public protection unit, whereby dates marking the end of probation care are comprehensively monitored by the force to foresee demand and ensure safeguarding is thorough and that opportunities are not missed.*