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Comisiynydd Heddlu a Throesddu Gwent | Police and Crime Commissioner for Gwent: Jeff Cuthbert B.Sc., MCIPD

The Rt Hon Suella Braverman KC MP
Home Secretary
Home Office
2 Marsham Street
LONDON
SW1P 4DF

25th May 2023

Dear Home Secretary,

An inspection of how well the police and National Crime Agency tackle the online sexual abuse and exploitation of children

As required by statute, I am writing to you to respond to the inspection report from His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) entitled, 'An inspection of how well the police and National Crime Agency tackle the online sexual abuse and exploitation of children'.

We continue to recognise the significance and scale of the issue of online sexual abuse and exploitation of children in Gwent. This is re-iterated by the Chief Constable in her comment below:

I welcome this inspection report from His Majesty's Inspectorate of Constabulary and Fire & Rescue Services which examines how well the police and National Crime Agency (NCA) tackle the online sexual abuse and exploitation of children. These are horrific crimes that have a devastating impact on the lives of victims and their families. I am committed to implementing the recommendations made to Chief Constables within the report to make sure children are protected and offenders are brought to justice.

In Gwent, our Police On-Line Investigation Team (POLIT) was formed in 2016 and is made up of dedicated officers and staff, who work tirelessly to develop intelligence passed to the force by partner agencies and through force software to identify those who have accessed indecent images of children. As the report highlights, officers and staff working in these roles have significant psychological demands placed on them. They are provided with enhanced welfare support including annual psychological assessments, regular inputs on coping strategies from our wellbeing team and an embedded wellbeing champion.

As the report also highlights, the identification and investigation of online child sexual abuse and exploitation is challenging and complex in nature. I therefore welcome the recommendations regarding the introduction of national guidance and training material in this area which will support investigators and ensure there is consistency of approach across the country.

Rydym yn croesawu gohebiaeth yn y Gymraeg, a phan ddaw i law, byddwn yn ateb yn y Gymraeg – ni fydd hyn yn gohirio ein hymateb. Os hoffech dderbyn gohebiaeth yn y Gymraeg o hyn ymlaen, neu os ydych wedi cael eich gwahoddi gyfweiliad neu gyfarfod ac yr hoffech ddefnyddio'r Gymraeg, anfonwch e-bost at: Commissioner@gwent.police.uk. Darperir gwasanaethau cyfieithu.

We welcome correspondence in Welsh and where received, we will reply in Welsh - this will not delay our response. If you wish to receive correspondence in Welsh hereafter or if you have been invited to an interview or meeting and you wish to use Welsh, send email to: Commissioner@gwent.police.uk. Translation services will be provided.

As indicated in her comments, the Chief Constable and I remain committed to tackling the online sexual abuse and exploitation of children. Combatting serious crime and supporting victims and protecting the vulnerable are priorities within my Police and Crime Plan. We recognise the severity and often hidden nature of these crimes and are committed to working closely with partners and taking a strategic approach to identify and respond to both victims and offenders and prevent further harm.

I have included an update from the Chief Constable on the relevant recommendations requiring a response:

- **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 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.

- **Chief Constable Response:**
The demand of the Police On-Line Investigation Team (POLIT) is reviewed on a weekly basis by the Detective Sergeant. This feeds into a monthly performance report to the Detective Inspector of Cyber Crime and Detective Chief Inspector for Crime Operations. Performance information includes the number of intelligence submissions under development and awaiting enforcement, including the risk level (low, medium, high, very high).

Cases are prioritised by POLIT based on the Kent Internet Risk Assessment Tool (KIRAT) risk assessment. There is a spreadsheet which records the date intelligence is received, the risk level and current status.

Capacity and capability are reviewed formally on a quarterly basis and is reported into the Strategic Policing Requirement Group, chaired by Detective Chief Superintendent, Head of Crime.

The Regional Organised Crime Unit are looking to create a problem profile for online child sexual abuse and map the data for the region to provide an enhanced understanding of demand.

- **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.
- **Chief Constable Response:**
A comprehensive review of capacity and capability was completed in 2021. This review specifically included an assessment of the number of detective roles and intelligence officers within POLIT. Overall staffing levels were increased by 60%; this included doubling the number of detectives and intelligence officers (from 2 to 4 and 1 to 2 respectively). This review also included an assessment of specific roles and training requirements. Training gaps were identified, and these have been addressed over the last 12 to 18 months. Officers have received the required training in Achieving Best Evidence (ABE), advanced suspect interviewing (T3) and in interrogating peer-to-peer (P2P) intelligence systems. There is a Digital Forensic Examiner seconded to the team and funding authorised to train two Digital Media Investigators in 2023. Upskilling of frontline officers will take place on force training days in 2024/25.
- **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.

- **Chief Constable Response:**

A review of our statutory obligations was completed in September 2021. Most notably, this included the statutory 'Duty to Report Children at Risk' under Section 130 of the Social Services and Well-being (Wales) Act 2014. Information sharing was initially identified as a concern, as in common with other forces previous information sharing had not been adequate or timely. The issue has been addressed by liaising with safeguarding leads across the five local authorities and raising awareness of the POLIT team's, processes, and embedded risk assessments. This resulted in the creation of the 'Gwent Police Online Investigation Team Safeguarding Protocol' which is shared with local safeguarding leads and is fully embedded into current working practices. This guidance is written in accordance with the All-Wales Safeguarding Procedures and the All-Wales Practice Guide for Safeguarding Children from Online abuse. The last review was completed in July 2022 and no issues have been identified.

- **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.

- **Chief Constable Response:**

There are suitable commissioned services and pathways in place to support these cases. Victims of sexual exploitation will be identified by the Victim Care Unit and offered a referral to an appropriate service; this could be our Children and Young People support service in our multi-agency victims' hub, Connect Gwent, or to New Pathways and the sexual assault referral centre (SARC). The Head of Victim Services is looking to introduce single points of contact (SPOCs) within Victim Services, including for children, to ensure a more collaborative relationship with our partners.

While online sexual offences wouldn't sit within the SARC from a forensics perspective, victims would be entitled to have an ABE interview in a SARC with the support of a specialist crisis worker and be entitled to support from an Independent Sexual Violence Advocate (ISVA); our current service provider, New Pathways, would be able to pick up these cases.

ISVA support may be more appropriate for these cases due to the wrap around therapeutic support offered from their counselling team but of course it would be the child's choice, or they could have both.

PCC comment: my office conducts regular contract review meetings with commissioned services to ensure that the support provided meets the needs of victims. Where any gaps or challenges are identified, we will either work with the existing service provider to improve the offer in place or implement new services that provide an appropriate pathway to support.

- **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 (CEOP)) material.

- **Chief Constable Response:**

All POLIT documentation that is used to provide guidance or support is sourced from approved agencies and charities. These include the NCA/CEOP (ThinkUKnow), Internet Watch Foundation and Lucy Faithfull Foundation (Stop It Now). Materials were reviewed in April 2023 and the messaging is consistent with CEOP (ThinkUKnow).

PCC comment. my office works closely with Gwent Police to ensure that any information we provide to the public is consistent with the relevant national materials or guidance in place. This includes information provided to the public during engagement events as well as online publication.

- **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.

- **Chief Constable Response:**

The current position in Gwent is that POLIT will investigate and retain all investigations that are disseminated via NCA, CEOP, UCOL and international partners.

Investigations involving OCAG's (vigilante groups) are investigated by divisional CID, with assistance from cyber/POLIT as required.

If there is a call for service, low risk peer-to-peer sharing of age-appropriate imagery (self-generated) may be dealt with by uniform officers in circumstances where there is no identified risk to the child. Mitigating the risk for these cases, is the fact that all investigations will have a Public Protection Notice submitted, and the decision maker has the autonomy to escalate any concerns or allocate a public protection officer if necessary.

- **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.

- **Chief Constable Response:**

The departmental review completed in 2021 ensured that POLIT now has sufficient capacity to meet the current demand. The 60% increase in staff saw an uplift in real terms of 6 officers, from 10 to 16. Recruitment was achieved by November 2022 and as of early 2023, all staff have been released and are in post. All staff have completed the KIRAT v.3 College Learn training regarding timescales.

- **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.

- **Chief Constable Response:**

This is not an issue for us in Gwent. Applications for warrants are now completed via email and have been for some time. Appointment times are provided in advance and verbal communication with legal clerk and magistrate is done remotely. There is also an established out of hours process. POLIT have excellent working relationships with the Courts and Magistrates and there have never been any issues accommodating an urgent request.

In collaboration with South Wales and Dyfed Powys Offices of the Police and Crime Commissioner (OPCC), my office has recently appointed Supporting Justice to undertake a victims' needs assessment. This is not a review of how Gwent Police support victims but should inform us of what gaps there currently are in the support services available, including for children and young people. We are expecting this report to be submitted to us in the early Summer and it will help us to recommission adult and children's victims' services in Connect Gwent, in 2024.

Together with Gwent Police, my office and I have made a commitment to putting the needs of children and young people at the heart of what we do, which includes taking a 'child first' approach across policing. As part of this, we are working to:

- Build stronger relationships between Gwent Police and children and young people, listening to, and respecting the voice of every young person to help understand the wide range of issues that affect their lives
- Improve the life chances of children and young people who are involved in crime by working with organisations such as the Youth Offending Team.
- Support children and young people who are victims of crime.

My team works closely with Gwent Police and partners to engage with children and young people in our communities. For example, OPCC staff and Gwent Police officers recently attended three health and wellbeing roadshows at Coleg Gwent's campuses in Ebbw Vale, Torfaen, and Newport. The roadshows' theme was healthy relationships, and the team provided a range of leaflets and advice on how to stay safe online, how to avoid romance fraud, and on the dangers and consequences of 'sexting' (the sending and/or receiving of nude images).

My office continues to co-ordinate the annual Youth Question Time event, which brings together children and young people from across Gwent with some of the region's top leaders. The event provides a real opportunity for young people to ask direct questions of decision makers on matters that are important or of concern to them. Their feedback on the issues raised is used to inform the planning and provision of related services and activities to support an effective and appropriate response.

I will now continue to work with the Chief Constable to ensure that the governance arrangements in place support the effective scrutiny of Gwent Police's response to tackling the online sexual abuse and exploitation of children, and that commissioned services are in place provide the right support to victims.

Yours sincerely



Jeff Cuthbert B.Sc., MCIPD
Police and Crime Commissioner for Gwent