

RESPONSE OF THE POLICE AND CRIME COMMISSIONER OF WILTSHIRE AND SWINDON TO THE HMICFRS REPORT

Policing response to the investigation of online child sexual abuse and the management of registered sex offenders

[Link to publication](#)

Chief Officer summary based on below responses

OPCC guidance. "Please provide below a clear and concise summary below aimed at the public. This makes it much quicker and easier for the public to access and understand the force response, and for the PCC's public response to be produced."

Summary:

Wiltshire Police fully accepts the recommendations in the report and has begun work to address these. Strong arrangements are already in place to manage demand, prioritise risk, maintain investigative oversight and safeguard vulnerable people. These processes are enhanced by established practice as the use of KIRAT (risk assessment), bespoke Target Research within Child Internet Exploitation Team, the management of ongoing risk, positive use of arrest and bail, oversight of MOSOVO demand, and the investment in staff wellbeing. Senior oversight is in place through leadership team scrutiny, performance monitoring and governance arrangements. Going forward particular focus will remain on development areas aligned to the recommendations e.g. workforce capacity, data systems and future transformation activity.

Recommendation 01 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. Context: HMICFRS found that many forces had long standing backlogs of online child sexual abuse referrals, sometimes over a year old, without refreshed intelligence checks. This meant forces could not be confident that risk to children had not increased. In some cases, lower risk work was allocated outside specialist OCSAE teams with limited oversight, leading to stalled investigations and unmanaged risk.	Wiltshire Police uses Kent Internet Risk Assessment Tool (KIRAT) to prioritise referrals for all adult suspects who may pose an elevated risk of committing contact sexual offences against children. Additionally, the limitations of KIRAT are recognised and catered for (it was designed for adult males only and can fail to capture relevant contextual/nuanced information). KIRAT is applied to all investigations managed by the force's Child Internet Exploitation Team (CIET), as opposed to just those referred in via usual processes (NCA submitted 'upload' offences). To illustrate, cause/incite and sexual communication offences referred in following UC work carried out by a Regional Organised Crime Unit would also be subject to KIRAT assessment, providing a nationally consistent approach to risk assessment. Workloads are managed in accordance with both the KIRAT prioritisation timescales (Very High Risk = 48hrs, High Risk – 7 days, Medium Risk = 21 days and Low Risk = 60 days) and the National Prioritisation Tool (1-5 tier system). CIET researchers create bespoke Target Research Forms (TRF) for every suspect; each is reviewed and assessed by one of the unit's specialist detective sergeants. The TRF is a detailed intelligence snapshot, which addresses the KIRAT's 'contextual gaps'. TRF's are also completed for female suspects and those under 18yrs, again addressing the relevant gaps in the KIRAT assessment process. Two TRF's are used to manage CIET's under u18yrs cohort. Wiltshire Police is committed to avoiding the unnecessary criminalisation of children and as such, a Youth TRF will be prepared if an educational approach is deemed the most proportionate response/outcome e.g. if it is the first time a child/young person has come to notice, images are self-generated and/or the individual is believed to be a victim of sexual exploitation. If it determined that a child or young person's behaviour has surpassed educational intervention, then a general TRF will be prepared and the matter subject to routine investigation. CIET investigators hold an average workload of 20 cases. No relevant investigations sit outside of the unit. CIET researchers/supervisors grade/triage all new referrals, with investigations allocated based on levels of risk. To expedite the force's response, and free up CIET investigators to concentrate their efforts on matters
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	which attract the most risk, responsibility for managing the youth educational interventions (only) has recently transferred to the force's Missing and Exploitation Unit (as of the 1st of June 2026). CIET retains overall governance of this process to monitor compliance. Ongoing risk is managed via mandatory refreshed intelligence checks, at 3-month intervals. This is to ensure that any increases in risk is identified and mitigated at the earliest opportunity. Fresh intelligence checks are also triggered at 3-month intervals, post arrest, to ensure the effective management of suspect welfare.
Recommendation 02 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. Context: Inspections found OCSAE officers carrying 30–54 live cases, causing delays to arrest, device examinations and safeguarding. Despite previous inspection warnings, some forces had not increased staffing. Excessive workloads were linked to investigation delays, missed safeguarding opportunities and staff burnout.	CIET investigators hold an average workload of 20 cases (at various stages from initial allocation to trial). No relevant investigations sit outside of the unit. A dedicated 'youth prevention' officer sit within CIET, responsible for managing the educational/safeguarding response to members of the under 18yrs cohort suitable for diversion. In addition to administrating educational visits, the officer co-ordinates relevant partnership relationships (Child Services/Youth Offending Teams/Education). CIET is currently carrying vacancies, however as a recognised area of organisational risk, recruitment processes are prioritised. A recent Force Review Programme assessment recommended an uplift of two staff into the unit.
Recommendation 04 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. Context: Some forces relied heavily on voluntary attendance or release under investigation, even for serious online offences. This removed safeguarding powers and left suspects able to reoffend.	To ensure the effective management of risk, CIET practice involves positive arrest and bail processes. Any deviation must be sanctioned by a CIET Detective Sergeant. When appropriate, CIET uses (unannounced) electronic device triaging to support decision making, using Advanced Digital Forensics (ADF) software, to enhance the unit's capability to triage devices at scene. A further x15 ADF courses/licenses have been invested in. To ensure strategic oversight, Bail to RUI conversions are a monthly key performance indicator monitored at the monthly Vulnerability Department Leadership Team Meeting.

HMICFRS also found bail conditions were often not checked, reducing their value as a risk control measure.	The force mandates 3-monthly refreshed intelligence checks on CIET investigations to ensure that any public/welfare risks are identified and mitigated at the earliest opportunity.
Recommendation 05 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. Context: Families of suspects were often severely affected, yet support provision was inconsistent and sometimes limited to information leaflets. HMICFRS found better outcomes where forces used third sector organisations or dedicated staff, separating investigation from family welfare support.	Wiltshire Police has developed a business card with a QR code which links to national third-party support provisions, as well as useful police contacts. The QR code provides links to support in three key areas - I. Support for families of people under investigation. II. Support for those under attest. III. Generic internet safety advice. Referrals include, but are not limited to, the Lucy Faithfull Foundation, ‘Stop it Now’ and NHS support. The business cards are designed to be carried on the person and to be more discreet than previous used leaflets, which could be seen by guests to a home. Families of those affected always get the choice between a business card and national leaflets, as the latter are still carried by CIET staff.
Recommendation 06 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. Context: Many forces had fragmented MOSOVO structures, inconsistent application of guidance and weak central oversight. Poor data quality meant forces could not identify overdue visits, risk assessments or staffing pressures, increasing the likelihood of unmanaged risk.	MOSOVO/IOM demand is currently tracked using a spreadsheet, which provides supervisors and managers with immediate access to data, enabling management of demand and risk. Current processes facilitate the regular monitoring and understanding of overall system health. However, the limitations of relying on a spreadsheet is recognised, with the force in the process of developing an application to link relevant systems and provide real-time data. A dedicated Violent and Sexual Offenders’ Registrar is in place and responsible for securely managing the database by inputting criminal records of registered sex offenders and violent nominals. The role also updates risk assessments and ensures partner agencies share information on nominals as applicable. Each year, an Active Risk Management System (ARMS) assessment is carried out by the relevant Offender Manager (OM) and recorded on Violent and Sexual Offenders’ Register (ViSOR). This also covers the risk management plan, mitigation and actions for the coming 12 months.

Recommendation 08. 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. Context: HMICFRS found high caseloads, frequent abstractions and insufficient supervisors, leaving key risk management work undone. Some supervisors were responsible for hundreds of offenders, making meaningful oversight impossible. Outstanding risk work directly increased public protection risk.	The average ratio of OM to nominals in Wiltshire is currently 1:58, which is above the national average of 1:50, although has been an improving trend for a sustained period. Supervisors ensure that nominal workloads are shared fairly and consistently. Demand and unit obligations are tracked using a spreadsheet, to ensure regular monitoring and an understanding of overall system health. Boundary changes are monitored and matters transferred when appropriate, although never to the detriment of risk management, which underpins all decision making. System health is monitored/scrutinised by senior management, at monthly Department Leadership Team meetings. Wiltshire Police is currently engaged in a Transformation Programme. Data collected by MOSOVO/IOM teams, along with external factors expected to impact service delivery e.g. changes to Sentencing Guidelines, an uplift in NCA resourcing resulting in higher CIET referrals and the NPCC directed restructure of IOM processes, will be used to predict future demand and shape team structures and practices via the transformation process. ARMS training has been heavily invested in over the last 12-months. All relevant supervisors are trained, along with the majority of OM's. All eligible staff will be trained within the 6-months (training schedules built).
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	MOSOVO Teams do not conduct single-crewed home visits. Visits are always carried out in pairs, in line with APP, even at times of high demand. Single crewed visits are recorded, however in practice these only manifest in specific circumstances, e.g. an in-person registration at a police station. All will be reviewed/authorised by a supervisor on a case-by-case basis. Single crewed visits are monitored/scrutinised by senior management, via a dedicated key performance indicator, which features at monthly Department Leadership Team meetings.

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. Context: Inspections found single crewed or planned visits used to manage demand, contrary to APP. This reduced the quality of risk assessment and created opportunities for offenders to conceal offending. Forces also failed to use national intelligence systems consistently.	All home visits are aimed at being unannounced. Any deviation from this standard must be authorised at management level and individually risk assessed by a supervisor. It is very rare and would never include high risk nominals or those with convictions for IIOC offences or those relating to digital devices. Decision making/rationales are recorded on police systems (Niche), for future scrutiny
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. Context: OCSAE and MOSOVO staff routinely deal with highly traumatic material, yet wellbeing support remained inconsistent. Many staff did not self-refer due to stigma or lack of awareness. HMICFRS found forces with mandatory screening identified issues earlier and reduced sickness and burnout.	The CIET and Offender Management Teams receive annual Risk Assessment Based Medicals (RABM's) designed to screen staff and overall departments to identify any welfare threats and provide specific interventions, tailored to specific risk factors. Staff welfare is tracked via regular 1-2-1's with supervisors and features as a standing agenda item at quarterly continuous professional development events, with specific welfare inputs delivered by one of the unit's dedicated welfare champions and/or relevant guest speakers, e.g. Occupational Health practitioners. Staff have access to dedicated welfare rooms, which enable them to step away from their workloads and decompress. In addition, staff are encouraged to run bi-annual off-site welfare days. Again, these are arranged/facilitated by dedicated welfare champions and attract very positive staff feedback.

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. Context: Delays in information sharing from probation left police without timely risk assessments or RMPs when responsibility transferred. This weakened offender management at critical transition points. Stronger formal agreements improved consistency and safeguarding.	The Integrated Offender Management Detective Inspector and Probation managers perform scheduled scrutiny of system health in accordance with a local service level agreement. Risk assessments and decision making, in the form of Risk Management Plans, are dip sampled monthly. This audit process allows for the joint understanding/sharing of risk and learning opportunities. There are no notable delays in information sharing between Probation and Police. In addition, Police and Probation supervisors also maintain regular and positive engagement, fostering a culture of collaboration.
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This response is prepared in line with Section 55(5) of the Police Act 1996 which requires the local policing body (OPCC) to comment on HMICFRS published reports. Please see Annex A which details.

Police and Crime Commissioner's comments

"In my Police and Crime Plan, we are clear that child abuse and exploitation, particularly offending facilitated online, represent a serious and evolving threat. This requires a policing response that is consistent, professional and firmly centred on safeguarding victims.

At the core of this work is how we support children and young people who come forward. Too often, victims experience a justice process that feels complex, daunting and overwhelming, particularly where they have already suffered trauma. We are committed to ensuring that every child receives a clear, supportive and victim-focused response from the very first point of contact.

The Chief Constable's response confirms that Wiltshire Police has accepted all recommendations and sets out the existing operational arrangements in place, including prioritisation processes, governance structures and specialist team oversight.

I welcome this acceptance and the evidence of established frameworks already in operation. However, it is equally clear that further work is required, particularly in relation to workforce capacity, data capability and the delivery of planned transformation activity.

I will continue to hold the Force to account for delivering these improvements at pace, ensuring that risks identified are addressed and that progress against recommendations is clearly evidenced.

Wiltshire Police must continue to strengthen its response to child abuse in all forms, including online exploitation. Officers and staff must be equipped to identify the signs of grooming and exploitation at the earliest opportunity and to respond confidently and appropriately to disclosures that are often complex, delayed and shaped by trauma.

A trauma-informed, child-first approach is essential. Victims must be supported consistently and sensitively throughout the investigative process, with their welfare, voice and individual needs placed at the centre of every decision. This is fundamental not only to securing justice, but to ensuring children feel heard, protected and supported.

We also need continued improvement in investigative outcomes, particularly in serious sexual offence cases, including those involving online abuse. These investigations are often highly complex and demand strong capability in digital evidence and specialist policing techniques.

Alongside this, we must maintain robust management of those who pose the greatest risk to children, including registered sex offenders. Effective multi-agency working remains critical, ensuring timely information sharing, accurate risk assessment and swift intervention where required.

Prevention is equally important. Continued engagement with schools, safeguarding partners and communities is essential to raise awareness, reduce vulnerability and identify risk at the earliest possible stage.

Ultimately, our objective is clear: to ensure every child who experiences abuse receives a policing response that is professional, compassionate and effective—one that pursues offenders rigorously while supporting victims with dignity throughout their journey through the justice system."

Responses to HMICFRS inspection reports

If HMICFRS has published an inspection report, and that report relates to a police force, section 55 of the Police Act 1996 requires the local policing body (the police and crime commissioner and the equivalents in London and Manchester) to prepare comments on the report and to publish them (section 55(5)).

Inspection reports are sometimes concerned with only one police force; some relate to several forces; and some relate to all forces (usually national reports and thematic reports). Unless a particular force is clearly not the subject of the report, the following procedure (required by section 55) must be followed.

If HMICFRS has published both a national report and a force-specific report on the same subject (for example, efficiency or domestic abuse), it is necessary for the following procedure to be followed in respect of both the national report and the force-specific report, except where the national report and the force-specific report contain the same findings and recommendations. In the latter case, it is necessary to follow the procedure only in respect of the force-specific report; repetition and duplication are of course unnecessary.

The local policing body must first invite the chief officer of the force to submit to the local policing body his or her comments on the HMICFRS report before such date as the local policing body specifies (section 55(4)).

The local policing body must then prepare his or her comments on the published inspection report, and must publish those comments, together with the chief constable's comments and any response which the local policing body has to the chief constable's comments (section 55(5)).

Those comments must be published within 56 days of the date of publication of the inspection report (section 55(5A)).

If the inspection report contains recommendations, the local policing body's comments must include an explanation of:

- a. the action the local policing body has taken or proposes to take in response to the recommendations;
or
- b. why the local policing body has not taken, or does not propose to take, any action in response (section 55(5B)).

The local policing body is required to send a copy of the published comments to HMICFRS and the Home Secretary (section, 55(6)).