



10th June 2026

Dear Home Secretary

Re: PEEL Spotlight- The policing response to the investigation of online child sexual abuse and the management of registered sex offenders

I welcome the PEEL Spotlight report, which clearly sets out the significant demands placed on policing when responding to some of the most serious and distressing forms of offending. West Yorkshire Police (WYP) has accepted all nine recommendations and assigned a senior leader within the Safeguarding Central Governance Unit to oversee the operational delivery. Progress will continue to be monitored and reported to the Assistant Chief Constable for Safeguarding.

I am assured that WYP has already implemented many of the recommendations highlighted in the report. The force continues to use the Kent Internet Risk Assessment Tool to prioritise referrals involving both child and adult suspects, and in 2023 it revised its Child Safeguarding Risk Assessment processes to better understand and manage risk both posed by and to suspects. These assessments are now embedded within the PVP Power BI environment, with compliance monitored through district-level health checks, ensuring a consistent and data-driven approach to safeguarding.

Significant investment has also been secured to enhance support for families affected by online child sexual exploitation investigations. The mayorally funded Family Matters provision offers tailored assistance to relatives impacted when warrants or arrests are executed in relation to indecent images of children, strengthening the force's victim centred approach.

Alongside this, West Yorkshire Police maintains a robust governance structure for managing registered sex offenders, supported by the Protecting Vulnerable People Board, specialist tactical delivery groups and quarterly safeguarding governance meetings. Data on late RSO visits is routinely analysed and shared across these forums, with ongoing improvements in data quality and analytical capability.

The force's wider safeguarding and offender-management capability is reinforced through annual Force Management Statements, strong partnership working with probation services and the Multi-Agency Public Protection Arrangements (MAPPA), and access to psychological health screening for staff working in high-risk areas. With the MAPPA Memorandum of Understanding nearing final sign-off and a senior safeguarding leader assigned to oversee delivery of all accepted recommendations, WYP is well positioned to maintain momentum, strengthen operational practice and continue reporting progress to the Assistant Chief Constable for Safeguarding.

Regards,

Alison Lowe, Deputy Mayor of West Yorkshire for Policing and Crime



Our response to key recommendation in the inspection report

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 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.

The force continues to use the Kent internet risk assessment tool to prioritise referrals for children and adult suspects. West Yorkshire amended force policy in 2023 with regards to Child Safeguarding Risk Assessment templates to understand and better manage risk posed by the suspect and risk posed to the suspect. The Child Safeguarding Risk Assessment data is now produced on the PVP Power Bi App and compliance monitored via the District PVP Health Checks.

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.

West Yorkshire Police's approach to Child Safeguarding has developed over the years to match the changing demand and complexity in this area. Each district has a dedicated Child Safeguarding team, a Child Vulnerable to Exploitation Team (CVET), an Online Child Abuse Investigation Team (OCAIT) and a Public Protection Unit (PPU). They also have their own Senior Investigating Officers (SIOs) to oversee cases as needed.

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.

West Yorkshire amended Force Policy in 2023 with regards to Child Safeguarding Risk Assessment templates to understand and better manage risk posed by the suspect and risk posed to the suspect. The Child Safeguarding Risk Assessment data is now produced on the PVP Power Bi App and compliance monitored via the District PVP Health Checks.



In relation to Bail, force policy states any contact with the suspect in order to extend bail must include a Child Safeguarding Risk Assessment (utilising the Child Safeguarding Risk Assessment Update template on Niche) to confirm that there have been no changes in the suspect's circumstances which may place any child at risk.

Where the suspect is released under investigation (RUI) for an offence involving a child, any contact with the suspect must include a Child Safeguarding Risk Assessment (utilising the Child Safeguarding Risk Assessment Update template on Niche) to confirm that there have been no changes in the suspect's circumstances which may place any child at risk.

A Child Safeguarding Risk Assessment must be conducted prior to the three-month (inspector), six-month (chief inspector) and 12-month (superintendent) review.

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.

West Yorkshire Police has received mayoral funding for a support provision for families affected by online child sexual exploitation abuse investigations. The provision 'Family Matters' provides support to family members who are impacted when Police execute a warrant/arrest relation to Indecent Images of Children.

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.

There is a strong governance structure in place with regards to the management of registered sex offenders, through the Protecting Vulnerable People Board, Child Abuse, Neglect and Exploitation Tactical Delivery Group and quarterly Safeguarding Governance Meetings with PPU Supervision. Data is used to review late registered sex offender (RSOs) visits and is shared across the governance meeting structure and improvements in data collection, analysis and review are ongoing.

In relation to the management of Registered Sex Offenders (RSOs), each district has a dedicated Public Protection Team with specially trained officers and police staff who work with probation and other agencies under Multi-Agency Public Protection Arrangements (MAPPA) to continually risk assess, develop risk management plans and manage those offenders to mitigate the risk of further offending against the public. This includes considering the risk to children and ensuring this is part of the risk management plan where relevant.



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.

Each year West Yorkshire produces the Force Management Statement (FMS) that assesses current and future demand and the capacity and capability of the force to meet that demand. The FMS assesses all policing functions and in total covers over 60 areas of demand, including the management of RSOs.

A clear governance framework underpins RSO/MOSOVO delivery, providing strategic oversight, performance scrutiny, and continuous improvement. Key roles include:

- **ViSOR Registrar**
Responsible for data integrity, compliance with national ViSOR requirements, and ensuring accurate recording and audit of offender information. Provides assurance around data quality and system performance.
- **Detective Chief Inspector – Public Protection Unit Governance**
In conjunction with the Safeguarding Delivery Manager provides strategic and performance oversight across the PPU'S. They Oversee continuous personal development, performance analysis, abstraction management, and ensures that teams are effectively meeting safeguarding responsibilities.
- **Safeguarding Delivery Manager**
Provides strategic and performance oversight across safeguarding functions, including MOSOVO. Supports continuous improvement, performance monitoring, and alignment with wider safeguarding priorities.

Governance is delivered through:

- Audit processes (including late visit audits and data quality checks).
- Escalation routes for risks relating to capacity, backlog, or performance.



- Regular Strategic Protecting Vulnerable People Board, and Tactical Delivery Group Meetings, along with PPU performance meetings reviewing demand, capacity, and compliance.

This structure ensures clear accountability, effective scrutiny, and a coordinated approach to managing sexual and violent offenders.

Recommendation 10

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.

During the PEEL (2023-25) inspection of West Yorkshire it was found that active risk management system (ARMS) assessments and risk management plans were completed to a good standard and complied with College of Policing authorised professional practice guidance. The management of registered sex offenders in reactive management also complied with authorised professional practice guidance and this was reviewed annually.

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.

Psychological health screening is available for management of sexual offenders and violent offenders and online child sexual abuse and exploitation team members, with access to follow-on well-being services.

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.

The force has good working relationship with the probation service. The current chair of the MAPPA Strategic Management Board sits within probation, and the deputy chair is the force's Local Policing and Safeguarding ACC lead. The MAPPA Memorandum of Understanding is about to be signed off by all parties, which ensures a strong service level agreement, enabling robust feedback and escalation if required and ensuring safeguarding opportunities are not being missed.