



# PCC and CC Force Inspection response record

Version Dec 2024

<b>Force</b>	Staffordshire
<b>Police and Crime Commissioner</b>	Ben Adams
<b>Chief Constable</b>	Acting CC Becky Riggs
<b>Title of inspection</b>	<a href="#">Inspection of the effectiveness of police and law enforcement bodies' response to group-based child sexual exploitation (GB-CSE) – a progress report</a>
<b>Published Date</b>	24/10/2025
<b>Inspectorate</b>	 <p>HMICFRS Making communities safer</p>
<b>Summary of inspection</b>	<p>HMICFRS's progress update notes encouraging national steps since 2023 but sets six new recommendations to ensure GB-CSE is consistently identified, properly understood and tackled at pace. Key themes include adoption of the IICSA organised-network definition, improved data and problem profiles (via the Hydrant Programme), better identification within police record management systems, and the eradication of victim-blaming language.</p>
<b>Grade</b>	
<b>Recommendations</b>	<p><b>Recommendation 1</b> By 31 March 2026, the Home Office, Department for Education and all police forces and law enforcement bodies that are yet to do so should adopt the Independent Inquiry into Child Sexual Abuse's definition of an 'organised network' as a definition of group-based child sexual exploitation. And they should make sure they use this definition in all relevant policies, training products, procedures and guidance</p> <p><b>Recommendation 2</b> By 31 March 2026, all police forces should fully adopt and use the Hydrant Programme's child sexual exploitation problem profile template as a minimum when preparing their 2025/26 child sexual exploitation problem profiles.</p> <p><b>Recommendation 4</b> By 31 July 2026, all chief constables should use the Hydrant Programme's guidance so forces can efficiently and accurately identify child sexual exploitation and group-based child sexual exploitation in their police record management systems.</p> <p><b>Recommendation 6</b> By 31 July 2026, all police forces should devise a strategy to implement Operation Makesafe consistently and include this in their child sexual exploitation data returns to the Hydrant Programme. This strategy should include the adoption and use of the rebranded Operation Makesafe police and partnership marketing materials.</p>



## Police, Fire and Crime Commissioner's initial response

HMICFRS's National Child Protection Inspection (NCPI) of Staffordshire Police (Dec 2025) found strong partnership working and some innovative practice, but identified areas requiring improvement—particularly online CSE investigations, accurate recording of missing children, and timely responses where police protection powers may be used. These findings inform the forces local action plan for group based CSE.

**Recommendation 1:** I support full adoption of the IICSA definition across Staffordshire Police policy, training, and analytical products to ensure consistent identification and recording of GB-CSE. My office will continue to monitor progress at Inspection and Audit Governance Board and Strategic Governance Board.

**Recommendation 2:** I expect annual, partner-informed CSE and GB-CSE problem profiles using Hydrant templates to drive targeted disruption and victim support. The first Hydrant-compliant problem profile produced with partner data (children's services, health, education) is due by 31 March 2026 with the next update by 31 March 2027.

**Recommendation 4:** Reliable flagging and data quality are essential for safeguarding and disruption and I expect Hydrant guidance to accurately identify CSE and GB-CSE in police record management systems by 31 July 2026. This configuration will need auditing to ensure data quality and corrections loop with analysts.

**Recommendation 6:** Staffordshire's recent Child Protection Inspection demonstrated improvement in the use of victim blaming language but there is still room to eradicate it completely. I expect immediate reinforcement of trauma-informed practice, especially in online CSE investigations supported by Hydrant CPD.

I remain committed to publishing progress on HMIC reports on the PFCC website under HMICFRS reports and Section 55 responses.

## Acting Chief Constable's response

The Acting Chief Constable is supportive and welcomes the recommendations contained within this report. The Force continues to strengthen its response to Child Sexual Exploitation (CSE) through a structured 4P approach, improved governance, enhanced recording practices, and increased multi-agency alignment.



To date the Force has delivered the following activities in support of the recommendation:

- Clear 4P governance architecture is in place, with strategic and operational CE groups fully established and embedded.
- Adoption of the national definition of “organised network”.
- A problem-profile-led approach drives targeted enforcement and partnership disruption (e.g., Op Switch, Op Rain), supported by place-based intelligence dashboards. Recommendations from Problem Profiles are amalgamated within the Partnership Delivery Plans.
- Improved recording and identification via Niche qualifiers, risk grading and daily scanning supports early intervention and consistent data quality. Work is on-going to ensure flags are added consistently and at the earliest opportunity to support safeguarding.
- Strengthened training and capability, including Hydrant inputs, NRM training, and learning from LCSPR Mikoto to improve safeguarding for neurodiverse/SEND children.
- Active rollout of Operation Makesafe, with renewed training, reality testing, and increased partner engagement. Makesafe is highlighted as a tactical commitment in our Child Protection Strategy.

The following key activities are on-going:

- Finalisation of Complex Abuse Procedure incorporating national CE definitions.
- Strengthening data quality through the CE flags governance paper and HRH/PPN workflows.
- Continued development of a shared multi-agency dataset/dashboard for CE
- SOC integration work, including review of 3A approach (Adopt/Assist/Advise) and covert capability training pathways.

A brief update is provided below against each of the recommendations within the report:

Recommendation 1: all police forces and law enforcement bodies that are yet to do so should adopt the Independent Inquiry into Child Sexual Abuse’s definition of an ‘organised network’ as a definition of group-based child sexual exploitation. And they should make sure they use this definition in all relevant policies, training products, procedures and guidance

- Governance reporting lines mapped and included in the CE Strategy
- Strategic and operational CE groups established and ratified across Staffordshire and Stoke, providing oversight and consistency.
- CE specialist skills matrix completed, including Hydrant Programme inputs and partnership training.
- CE Annual Delivery Plan created (awaiting sign-off).



Recommendation 2: all police forces should fully adopt and use the Hydrant Programme's child sexual exploitation problem profile template as a minimum when preparing their 2025/26 child sexual exploitation problem profiles.

- CSE problem profile completed and shared with partners; multi-agency action plan established.
- Group-based offending (GBO) profile completed.
- Operational profiles Op Switch and Op Rain delivered with SIO-led 4P plans, resulting in arrests and disruption activity.

Recommendation 4: By 31 July 2026, all chief constables should use the Hydrant Programme's guidance so forces can efficiently and accurately identify child sexual exploitation and group-based child sexual exploitation in their police record management systems.

- CE/CSE Niche qualifiers implemented, with improved risk grading aligned to partnership categories: Vulnerable, Suspected, Exploited.
- Daily intelligence scanning and At Risk Child process embedded as BAU to surface early indicators of CSE.

Recommendation 6: By 31 July 2026, all police forces should devise a strategy to implement Operation Makesafe consistently and include this in their child sexual exploitation data returns to the Hydrant Programme. This strategy should include the adoption and use of the rebranded Operation Makesafe police and partnership marketing materials.

- Operation Makesafe deployment completed Jan 2026, identifying multiple problem hotels for follow-up disruption and safeguarding activity.
- Funding secured for Makesafe reality testing operations with partner involvement.

The delivery and monitoring of these recommendations will take place via existing governance channels.

### Police, Fire and Crime Commissioner's overall comments

As Police, Fire and Crime Commissioner for Staffordshire, I welcome the Acting Chief Constable's detailed response and the progress made so far in strengthening the force's approach to child sexual exploitation, including group-based exploitation. Protecting children from harm remains an absolute priority, and I expect continued pace, consistency, and transparency as the force delivers against HMICFRS's recommendations.

It is positive to see the formal adoption of the IICSA definition, the establishment of robust 4P governance, and the use of Hydrant-aligned profiles to drive more targeted disruption activity. Improvements in recording practices, Niche qualifiers, and risk grading are also welcome, recognising the impact that accurate identification has on safeguarding outcomes.



However, several areas now require sustained focus to ensure full compliance by the national deadlines. In particular, I will continue to monitor:

- Data quality and the consistency of CE/CSE flagging, including how early indicators are surfaced and corrected through audit.
- The completion of multi-agency datasets and dashboards, which are crucial for a shared understanding of threat, harm and risk across Staffordshire and Stoke-on-Trent.
- The integration of CE work with serious organised crime (SOC) capabilities, ensuring exploitation that overlaps with organised offending is recognised and tackled effectively.
- The roll-out and evaluation of Operation Makesafe, including partner engagement, the use of refreshed national materials, and evidence that the strategy is improving early identification in high-risk settings such as hotels and licensed premises.

The findings from Staffordshire's recent Child Protection Inspection also underline the importance of maintaining momentum in areas where improvement is still needed, particularly improving the knowledge and skills of officers and staff who investigate online child sexual exploitation and data quality in terms of correctly recording missing children to ensure appropriate responses and recording children's demographic information more consistently.

I will continue to hold the Acting Chief Constable to account for delivering these recommendations within the specified timescales. Progress will be reviewed through Inspection and Audit Governance Board, the Strategic Governance Board, and published openly on my website in line with Section 55 requirements. Ensuring children are protected from exploitation demands relentless attention, and I expect the force to continue demonstrating strong leadership, partnership working, and a victim-centred approach as this work progresses.