

# The London Child Exploitation Operating Protocol 2021



**NHS**

London  
safeguarding children  
Partnership

**LONDON  
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**METROPOLITAN  
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# Foreword

Children that come to notice must be treated as children, whatever the circumstances they find themselves in.

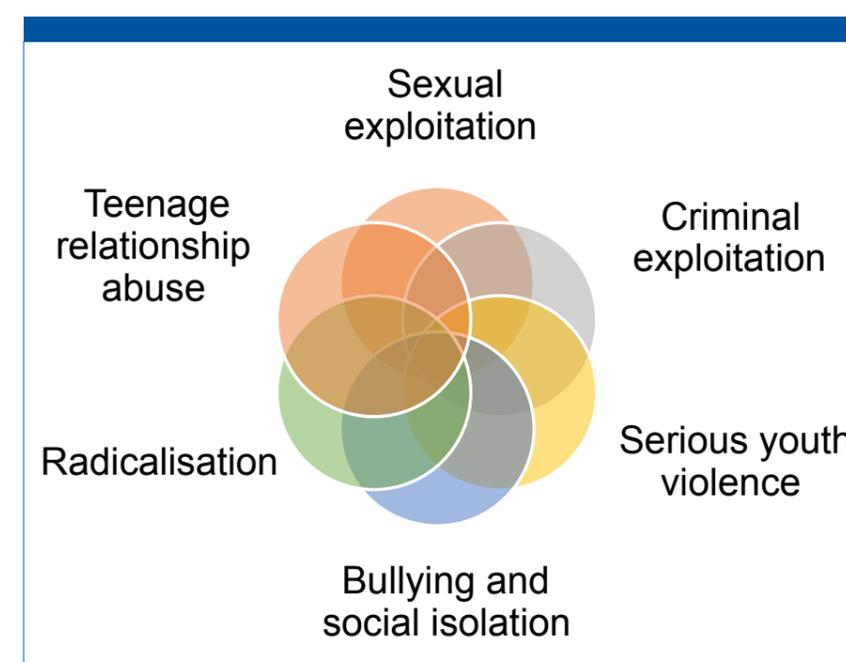
Safeguarding children from exploitation and violence is ‘everyone’s business’. We need to draw upon and share intelligence and information from these children, their peers, their communities and from the wide range of professionals that support them or come into contact with them in order to manage risk.

Tackling child exploitation is a complex task that requires a proactive, multi-agency, holistic approach. Understanding exploitation drivers, themes, risks and venues of concern will provide key prevention opportunities to stop children becoming victims of exploitation.

The management, disruption and prosecution of perpetrators is a key success driver in tackling exploitation. Perpetrators of child exploitation will groom children so that they are unaware they are being exploited. They will also use violence and coerce criminality through fear and provocation. It is vital that professionals work collaboratively to safeguard children and collectively deploy tactics to disrupt perpetrators and the drivers of exploitation.

Operationally, each form of exploitation will be categorised by its own definition however there are clear overlaps between different forms of exploitation and the associated risks. Risk is not siloed and our response must consider the multiple domains of risk children experience when exposed to exploitation. Children can be or perceived to be both victim and offender, harmed or harmer and our collaborative response must be able to manage both aspects together at the same time whilst safeguarding the child.

**The below image produced by Bedfordshire University demonstrates the interconnected nature of all forms of exploitation.**



# Chapter 1

## Introduction

This document sets out the London operating protocol for safeguarding and protecting the welfare of children from exploitation.

'The welfare of the child is paramount'. This protocol is police-led but equally owned by the Metropolitan Police Service, Local Authorities and Children's Services and Health. This document is designed to complement and not replace the London Child Protection Procedures ([www.londoncp.co.uk](http://www.londoncp.co.uk)) and other statutory guidance. It outlines how, through our partnerships, we assess, challenge and provide an enhanced, effective service to reduce the harm and threats posed to children from exploitation and target offenders to prevent and disrupt criminality.



Accountability for multi-agency safeguarding arrangements rests with local safeguarding children's partnerships and these will be important for oversight of local child exploitation arrangements and practice in relation to this protocol.

This protocol is non-statutory and has been produced to help practitioners, local leaders and decision makers who work with children and families to identify children vulnerable to exploitation and take appropriate action in response.

Similar disruption techniques can be used in relation to all forms of exploitation although there are circumstances that can demand different approaches. Factors such as the age of victims, the context in which offences occur and the risk they pose. These may require a range of different tools, deployed tactically by different agencies working collaboratively.

While some children are at greater risk of exploitation, all children, including those with no apparent vulnerabilities, can experience exploitation and other forms of extra-familial harm.

This protocol provides direction in relation to operational responses to exploitation. It is supported by a multi-agency Adolescent Safeguarding Practice Framework, which provides guidance on partnership approaches which are most likely to protect children and young people from harm, including various forms of exploitation. The Adolescent Safeguarding Practice Framework is appended to this protocol.

## 'The welfare of the child is paramount'.

### Aims

- Treat children as a child first.
- Identify children at risk of exploitation.
- Identify and take action against perpetrators.
- Ensure a consistent contextual safeguarding response so children receive the best outcomes.
- Ensure the safeguarding and welfare of children who are, or may be, at risk from exploitation with a collaborative approach.
- Raise awareness, identify and implement intervention opportunities to prevent child exploitation.

### Principles

The principles underpinning a multi-agency response to the exploitation of children include the following:

- Child exploitation is a form of child abuse.
- Child exploitation can lead to children being subjected to serious youth violence.
- Exploited children should be treated as victims of abuse, not as offenders.
- Children may be victims as well as perpetrators.
- It is vital that language is used which adequately describes the children's experience and does not place any blame on them – [www.csepoliceandprevention.org.uk/sites/default/files/Guidance%20App%20Language%20Toolkit.pdf](http://www.csepoliceandprevention.org.uk/sites/default/files/Guidance%20App%20Language%20Toolkit.pdf)

## Chapter 2

# Types of exploitation

All categories in Chapter 2 can be complex and in many circumstances involve vulnerable children, on occasions they may not neatly fit into the below definitions. On occasion a child may demonstrate warning indicators for multiple types of exploitation and there may be a number of crossovers.

### Child sexual exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology.

### Harmful sexual behaviour

The definition for young people who display harmful sexual behaviour refers to any child, under the age of 18, who demonstrates behaviour outside of their normative parameters of development (this includes, but is not exclusive to, abusive behaviours) (Hackett 2011, National Institute of Health and Care Excellence 2014).

Statistically, young boys are most likely to be perpetrators of sexual violence and sexual exploitation, and young girls are most likely to be at risk of or experience sexual exploitation. (*Children's Commissioner's study, Berelowitz et al, 2012*). However, the situation is more complex, as young men can experience sexual exploitation, including as part of violence and coercion to pressure them into performing acts as part of a group

or gang which includes sexually exploiting others. Additionally, young girls can become involved in recruiting other young girls to be sexually exploited or be involved in acts of sexually exploiting others as part of their own experiences of being sexually exploited or as part of a pattern of violent offending. Currently there is likely to be a significant under-reporting of young boys who have experienced sexual exploitation (*Research on the sexual exploitation of boys and young men – A UK scoping study, Barnardo's, August 2014*).

### Child criminal exploitation

Child criminal exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child under the age of 18 to undertake criminal acts. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact, it can also occur through the use of technology. Criminal exploitation of children is broader than just county lines and includes, for instance, children forced to work on cannabis farms or to commit theft. Child criminal exploitation also includes forms of economic exploitation. For example where a child is paid to transfer money in and out of their own bank account to assist with money laundering. Any criminal offence can constitute child criminal exploitation.

### County lines

Child criminal exploitation is an element of county lines.

The national definition of county lines: 'A term used to describe gangs or organised criminal groups involved in exporting illegal drugs into one or more areas using dedicated mobile phone lines. They are likely to exploit children and vulnerable adults to move and store the drugs and will often use coercion, intimidation, violence and weapons.'

The groups often use local residential premises, often owned by a vulnerable person, as a base for their activities. This is often taken over by force or coercion, and in some instances victims have left their homes in fear of violence. Empty or commercial premises can also be used.

Perpetrators employ various tactics to evade detection, including rotating group members between locations so they are not identified by law enforcement or competitors. Perpetrators will also use women and children to transport drugs in the belief that they are less likely to be stopped and searched. Children are often 'plugged' (sometimes by the offender or by themselves) to transport the drugs.

Evidence of county lines will often become apparent to professionals when children are located after missing episodes outside the London area, where there is no apparent reason.

Involvement with in-force drugs supply is almost identical in nature to county lines style exploitation. The risks presented to the children involved in this type of exploitative behaviour are just as severe as those involved in county lines.

Particular attention must be paid to drug debts as seizing drugs or money will often perpetuate the cycle of criminality as children are further forced to 'work off' the debt (known as debt bondage). Groups may also seek to entrap children by staging robberies to then entrap the child.

### Child trafficking

It's defined as recruiting, moving, receiving and harbouring children for the purpose of exploitation. This exploitation can be criminal or sexual. Child trafficking is a form of modern slavery. Children can be trafficked into the UK from overseas and on their journeys are very often subject to sexual abuse. International child trafficking can be incorrectly labelled as child smuggling. Professionals are encouraged to be professionally curious in order to identify the trafficking risk indicators and implement a collaborative safeguarding response to the child. Responding to the vulnerability is a key factor. Exploiters may act as interpreters therefore, it's important the child is spoken to independently. Utilising accredited independent translators from the outset is key to capturing the best evidence. Investigations should be subject to a Section 47 joint investigation. A full risk assessment must be undertaken by all professionals before ensuring the child is placed with a suitable adult.

Children can also be trafficked from one part of the UK to another as evidenced in county lines. Child Trafficking varies from spontaneous networking between groups of offenders, to more serious organised crime where young people are effectively 'sold'. Children can be trafficked for criminal exploitation, and this can occur across and within Local Authority (LA) boundaries, regions and across international borders. This can occur at parties and gatherings where

children who are involved may recruit others into the network. Some of this activity is described as serious organised crime and can involve the organised 'buying and selling' of children by offenders.

### Radicalisation

Radicalisation is defined as the process by which people, including children, come to support terrorism and extremism and in some cases, to then participate in terrorist groups. Radicalisation also includes grooming into far right groups as well as Islamism and other forms. Radicalisation is not about a specific faith or demographic and there is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas. The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame and often involves an element of exploitation. For further guidance please review attached document produced by Department of Education.

[assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/635262/Safeguarding\\_and\\_Radicalisation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/635262/Safeguarding_and_Radicalisation.pdf)

### Online child exploitation

This generation has grown up in a digital world which has improved people's lives in many ways, such as giving us multiple methods to communicate and share information. It is a constantly changing and dynamic world that is now an essential part of a child's life. However, these freedoms also create new risks – according to the Child Exploitation and Online Protection Centre (CEOP), a significant number of child exploitation offences take place online.

These offences include deceiving children into producing indecent images of themselves and engaging in sexual chat online or sexual activity over a webcam. 2020 has also seen a significant increase of online grooming for child criminal exploitation including county lines.

Children at risk of online harm may not have any previous vulnerabilities. The first parents may know that their child has been a victim of criminal exploitation is when the police contact the family. Children often do not see the dangers of sharing intimate images of themselves to strangers. The internet creates a false feeling of security and diminishes inhibitions that would exist offline. The anonymous nature of the internet allows perpetrators to adopt false personas and build trust via online conversations. Children can fail to realise that they lose control of uploaded images, falsely believing the properties of social media applications will protect them. This leads to risks of blackmail and coercion against the child.

These factors can lead to any of the following risks:

- Online grooming and child abuse.
- Access to age-inappropriate content.
- Financial exploitation, where young people's bank accounts are used by exploiters to launder the proceeds from criminal activities.
- Bullying and cyberbullying.
- Personal information being obtained by perpetrator.
- Talking to strangers or people who misrepresent themselves.

### Youth-produced sexual imagery identified in schools

Children may take nude and sexual images of themselves and share them with other children and, whilst the taking and receiving of such images is a criminal offence and a criminal justice response may be necessary in some cases, the focus should be on providing a collaborative response which educates, supports and safeguards all children involved.

The following offences could be committed by sexting:

- Take or permit to take an indecent photo or video of themselves or another person under 18.
- Share an indecent image or video of another person under 18, even if it's shared between young people of a similar age.
- Possess, download or store an indecent image or video of a child/young person under 18, even if that young person gave their permission for it to be created.

There is assistance on the police intranet regarding this policy. <http://mpsweb.intranet.mps/policing/publicprotection/children/youth-produced-sexual-imagery-sexting1/>

### Peer-on-peer exploitation

Children can be exploited by children of a similar age as well as adults. Research is increasingly demonstrating that a significant number of exploited children have been abused by their peers. A London Councils report in 2014 found that peer-on-peer exploitation was the most frequently identified form of child exploitation in London. Children can be exploited by their peers in a number of ways.

In some cases children who have been exploited themselves by adults or peers, will recruit other children to be abused. In other instances, sexual bullying in schools and other social settings can result in the exploitation of children by their peers. Exploitation also occurs within and between street gangs, where sex is used in exchange for safety, protection, drugs and simply belonging.

For 16-and-17-year-olds who are in abusive relationships, what may appear to be a case of domestic abuse may also involve criminal exploitation. In all cases of peer-on-peer exploitation a power imbalance will still drive the relationship, but this inequality will not necessarily be the result of an age gap between the abuser and the abused.

### Organised begging

Organised begging is likely to be a form of modern slavery and if children are concerned it is a form of forced or compulsory labour. It occurs when Organised Crime Groups traffic and coerce vulnerable people to beg in busy retail or tourist areas. There is no specific offence of organised begging however, those who participate in organised begging may have been trafficked into the UK and may be held in conditions that may amount to slavery or servitude. Debt bondage is sometimes used to force individuals to beg. Children may also be used as props to generate feelings of sympathy.

## Chapter 3

# Prevention and early intervention

Preventing child exploitation is everyone's business. The police, children services, health, schools, youth justice, charities, parents and the wider community have a key role to play.

Child exploitation can be stopped. To prevent Child Exploitation and keep children safe it's paramount all professionals:

- keep child exploitation on the agenda,
- raise awareness of the warning signs associated to child exploitation,
- give children a voice to speak out,
- intervene at the earliest opportunity to safeguard the child,
- identify the key moment in a child's journey to engage and capture the evidence of exploitation (in some cases this may be when a child reaches their lowest point in life e.g. when victim of serious youth violence, serious sexual abuse or arrested),
- teach children about healthy and safe relationships, and
- make sure everyone knows how to identify signs of exploitation, raise the alarm and is aware of the relevant referral pathways.

### Types of prevention and early intervention

Prevention can occur at many points on a child's journey and has can come in different forms.

Primary prevention occurs in universal settings such as schools and colleges, it provides information and raises awareness for all children, young people and families about staying safe and reducing the risk of being exploited. This includes PSHE classes, online health messaging and publicly shared safety information. It also includes creating environments where children feel safe to discuss relationships, experiences and fears.

Secondary prevention is the targeted response to those who are showing indicators of behaviour, risks associated with exploitation, or groups who are more

vulnerable to exploitation such as those in alternative education provision or other children with special educational needs. What we refer to as 'early intervention' most often falls within the category of secondary prevention.

Tertiary prevention is about treating those who have experienced harm, exploitation, or trauma to enable their recovery and to prevent further harm. This includes therapeutic intervention to aid trauma recovery, relationship-based mentoring approaches, and specific responses at 'teachable moments' such as following arrest or assault.

### Schools

Schools should ensure that they provide an environment which is trauma-informed where staff can recognise and appropriately respond to behaviour which is a signifier of abuse and exploitation. Maintaining children in education is a critical protective factor against exploitation.

Schools, colleges and other educational institutes have a key role to play in raising awareness and there is a clear need for early and continuous education. Child exploitation can impact very young children and the risks are heightened due to the online world. If children are not educated about the dangers and what a healthy relationship is, then they will be left exposed to the risks of child exploitation.

Personal, social, health and economic lessons are an obvious route for educating children about the risks of child exploitation and other forms of harm and risks. School nurses, dedicated schools officers and safeguarding leads are also well equipped to deliver these sessions.

Consideration must be given to special educational needs (SEN) children and children who sit outside of the mainstream education settings. Options must be explored on how to educate these children on the associated risks. Professionals are encouraged to deliver these sessions in safe environments such as the family home or youth centres. SEN children or children who sit outside of main education are at higher risk of exploitation and therefore need particular attention and a bespoke response.

### Health

Health can provide key early intervention opportunities for child exploitation victims. Health services such as A&E, school nurses, GPs and sexual health clinics will encounter children demonstrating the child exploitation warning signs so it's pivotal they are aware of their statutory safeguarding responsibilities. Children may attend A&E as victims of serious youth violence and this could be a pivotal stage in the child's journey to accepting they are a victim of exploitation.

Health professionals are key contributors in providing the multi-agency, holistic approach to child exploitation. Health partners offer a range of services that can prevent child exploitation, provide intervention opportunities and support victim safeguarding plans. These include:

- school nursing services,
- mental health services,
- alcohol and drug misuse services,
- health visitors,
- sexual Health and reproductive services,
- community safety, and
- healthy relationships and sex education to schools and colleges.

## Parents

Parents play a crucial role in safeguarding and protecting their children from child exploitation. Research shows that confident, authoritative parenting which supports children to make informed decisions is a key protective factor in relation to child exploitation. They can educate their children on healthy relationships, sex and the risks associated with child exploitation. Parents have a responsibility to ensure their child's voice is heard and create a safe support environment where the children have the confidence to speak. Parents must not be afraid to speak out and request help from professionals when needed. All professionals must take every opportunity to support parents by ensuring:

- child exploitation is on the agenda of parents,
- parents are aware of the associated risks linked to child exploitation,
- they have the information to spot the warning signs,
- parents know how to raise the alarm and where to go for help, and
- they are provided a tailored support to assist families in safeguarding their children including through online exploitation.

Tools to assist parents to identify signs of exploitation are available through NSPCC and Children's Society websites and specific interventions and supporting materials are also available through Parents Against Child Exploitation [paceuk.info/for-parents/](http://paceuk.info/for-parents/)

## Practitioners and frontline responders

A multi-agency response is required to tackle child exploitation. Organisations with specific child safeguarding responsibilities need to ensure that they enable their staff to effectively share information within their organisation and with their partners. It is key that all practitioners are aware of everyone's aims that are politically important to them, mutually agree benefits and work together to safeguard children. All practitioners must be aware of:

- their local child exploitation safeguarding protocols,
- their areas of responsibility and remits,
- safeguarding responsibilities and local reporting routes and escalation pathways,
- child exploitation indicators, associated risks and importance of disrupting perpetrators,
- the importance of professional curiosity,
- the impact of trauma and associated risks, and
- the demographics of their borough, community complexities and ongoing challenges such as gangs and serious youth violence.

It is an organisational and personal responsibility that all practitioners and professionals must promote professional continuous development, look to benchmark, learn from others, review organisational learning such as Serious Case Reviews and strive to improve their practice at every opportunity. All practitioners must have effective supervision frameworks, high quality supervision, systems to undertake reflective practice and ensure the key enablers are in place for the workforce such as training, resources, wellbeing, equipment and estate.

## Communities

Mobilising the public is key to safeguarding the community and preventing crime. Child exploitation must be on the agenda of the wider community. Professionals play a key role in educating the wider community in order for them to identify the warning signs, risks and know how to raise the alarm. Operation Makesafe is a national strategy to identify potential victims of exploitation with the assistance of business owners/premises where exploitation has historically taken place. This will include hotels, taxis, fast food restaurants, licensed premises and care homes.

Child exploitation awareness training is provided to staff at these premises, in relation to the warning signs for child exploitation and what actions should be taken if they are concerned about a child's safety or suspicious behaviour or activity on their premises. If concerned, the business community are encouraged to ring 101 and quote Operation Makesafe, where they will receive an appropriate police response. Local Authorities and borough police are encouraged to promote this initiative within their borough.

There are also a range of community safety led initiatives such as taxi driver licensing schemes that require child exploitation training and there are other awareness raising campaigns locally, MOPAC supported and nationally through Home Office. For further information please review:

[www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/our-priorities/making-london-safer-young-people](http://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/our-priorities/making-london-safer-young-people)

## Mental Health

Children with mental health difficulties are more likely to be victims of crime, significantly feel the impact of being a victim of crime and they are less likely to get the support they need. The impact of crime at any stage of a child's life can have long-lasting effects and affect their development. 'Trauma can manifest in many ways including behavioural and mental health issues, alcohol and substance misuse later on in life, exposing themselves to dangerous situations, unable to recognise risk, repeat victimisation and criminal behaviour.'

Children with mental health problems are:

- three times more likely to be a victim of crime than the general population,
- five times more likely to be a victim of assault (this figure is significantly higher in girls),
- more likely to be a repeat victim and experience different types of crime, and
- far less likely to be satisfied with the service and support they receive.

## Understanding child trauma

Child trauma is defined as a scary, dangerous, violent or life threatening event that happens to a child. Clinicians may also refer to child trauma as Adverse Childhood Experiences (ACEs). These type of events can also happen if a child witnesses another child come to harm or they are concerned in dangerous circumstances. When these types of experiences happen, the child may become very overwhelmed, upset and very often feel helpless. These types of experiences can happen at any time throughout their journey to adulthood.

Complex trauma refers to multiple and/or ongoing traumatic experiences which have wide-ranging and long-term effects.

Not all overwhelming or life threatening experiences result in long-term trauma. Children interpret their unique experiences differently. A life experience that is traumatic for one child might not be traumatic for another, this will be mediated by the child's own experiences and characteristics and the protective factors they have in their family and wider environment.

Children may experience trauma as a result of a number of different circumstances such as:

- all types of child exploitation,
- neglect,
- exposure to domestic violence,
- victims of violence of domestic abuse,
- sexual assaults,
- substance misuse,
- mental illness,
- cyberbullying,
- racism, or
- economic stress.

Children that experience child trauma, particularly complex trauma are at greater risk of developing physical and mental health problems throughout their journey in life.

## Effects of Trauma

Trauma affects childhood development and can impact on physical and mental health as well as shaping behaviour to enable the child to cope and function from day to day. This may result in difficulties with emotional regulation (such as quickly getting angry, distressed, or impatient), hyper-vigilance and anxiety, difficulties in forming relationships or becoming too easily attached. These effects of trauma may bring children to the attention of professionals (e.g. police for anti-social behaviour or hospitals as a result of substance misuse) but these behaviours will often mask underlying traumas. Professionals also need to be aware that one of the effects of trauma may be to make children fearful of trusting others and unable to ask for help.

Children exposed to child trauma/ACE could develop or be at risk of the following:

- Low self-esteem and vulnerable to child exploitation.
- Significant medical issues.
- Drug, substance and alcohol dependency.
- Pose a risk of violence to an intimate partner.
- Poor academic or work performance.
- Depression.
- Suicide.
- Missing episodes.
- Sexually transmitted diseases.
- Criminal justice involvement.

## Responding to child trauma

A child's reaction to a traumatic event can be greatly influenced by the response of all persons connected to the child. Children react to trauma in different ways, and their feelings can come and go in waves. The following actions will help children deal with traumatic events:

- Reassure the child and make them feel safe again.
- Provide the child with ongoing opportunities to talk.
- Encourage the child to openly share their feelings but do not pressure them.
- Discourage the child from obsessively reliving the traumatic event.
- Be honest with the child.
- Encourage all family members to de-stress.
- Encourage the child to pursue activities they enjoy.
- Maintain routines and promote a healthy diet.

Children who have experienced complex or significant trauma are likely to require specialist support, related to their specific experiences in order to aid their recovery. Professionals should be aware of sources of specialist support and organisations should provide clear pathways to enable staff to ensure children receive the right help.

## CAMHS (Child and Adolescent Mental Health Services)

CAMHS is the name for the NHS services that assess and treat young people with emotional, behavioural or mental health difficulties. CAMHS support covers depression, problems with food, self-harm, abuse, violence or anger, bipolar disorder, schizophrenia and anxiety, among other difficulties.

There are local NHS CAMHS services around the UK, with teams made up of nurses, therapists, psychologists, child and adolescent psychiatrists (medical doctors specialising in mental health), support workers and social workers, as well as other professionals.

For further guidance and specialist support services available please review the attached NSH website:

[www.nhs.uk/mental-health/nhs-voluntary-charity-services/nhs-services/children-young-people-mental-health-services-cypmhs/](http://www.nhs.uk/mental-health/nhs-voluntary-charity-services/nhs-services/children-young-people-mental-health-services-cypmhs/)

## Chapter 4

# Identifying child exploitation

This document sets out the It's important to understand the risks of child exploitation. Offenders will use different tactics to recruit and exploit children, including befriending them, use of threats or coercing them.

Recruitment can occur not only through face-to-face interaction but through the use of social media and popular culture linked to music videos with the glamorisation of gang lifestyle and the perceived ease of making money. There are some groups that are particularly vulnerable. All children under the age of 18 can be subject to exploitation, but the peak age is around 15 years old and exploitation happens to children of all genders. Various agencies such as health, schools and youth justice will hold critical intel/information about the relevant child that will assist with decision making. It is key all agencies share this information to assist with the safeguarding plan. **Appendix C highlights additional risks indicators.**

Exploited children rarely approach the police or social workers directly and disclose that they are being exploited. It is the shared responsibility for all to identify children who are vulnerable or experiencing exploitation. It is important that everyone working with children be aware of the risk indicators as shown in the mnemonic **SAFEGUARD** – see **Appendix B**.

Factors that can make children more vulnerable to exploitation:

- Having a prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe/stable home environment.
- Victim or witness to domestic abuse.
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Economic vulnerability.
- Missing from home or care.
- Children not in education or employment.
- Organised Crime Group (OCG) association or criminality within the family.
- Intermittent drug usage or dependent on drugs and alcohol.
- Homelessness or insecure accommodation status.
- Pregnancy, termination, STIs and mental health issues.
- Connections and relationships with other children who are being exploited.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories).
- Children who are lesbian, gay, bisexual, transgender or whose gender identity differs from the sex they were given at birth.



They might:

- rarely leave their house or have no time for playing,
- be orphaned or living apart from their family,
- live in low-standard accommodation,
- be unsure which country, city or town they're in,
- be reluctant or unable to share personal information or where they live,
- not be registered with a school or a GP practice,
- have no access to their parents or guardians,
- be subject to private foster arrangements,
- be seen in inappropriate places like brothels or factories,
- have money or things you wouldn't expect them to, or
- give a prepared story which is very similar to stories given by other children.

### Police Assessment

If there are concerns a child is being targeted or groomed and the child exploitation warning indicators are present and in order to assess the nature of exploitation posed, a non-crime child exploitation report must be created or updated. The police levels used to grade child sexual exploitation have now been removed. All child exploitation non-crime reports will be supervised and investigated by the BCU Safeguarding Hubs. As more is known about a child or a situation, the investigating department can change throughout the child's journey to adulthood.

Specialist Crime will target/disrupt known perpetrators linked to non-crime child exploitation investigations where a child/children is being exploited sexually or criminally by a known OCG. There must be significant intelligence or an evidential case to support the exploitation element. All cases must be referred by to Specialist Crime by BCU officers via the escalation process. BCUs will maintain safeguarding responsibility of the concerned child/children. If the investigation does not pass the Specialist Crime threshold, written advice and actions will be provided. **Appendix G relates to the BCU escalation form.**

If a child exploitation non-crime investigation is closed and re-opened at a later date, it will be subject to a fresh assessment on the available evidence and intelligence.

### Children's Social Care assessment

Children's Social Care (CSC) conduct their assessment of need in the following four categories as outlined in the London Child Protection Procedures, available at: [www.londoncp.co.uk/files/revised\\_guidance\\_thresholds.pdf](http://www.londoncp.co.uk/files/revised_guidance_thresholds.pdf)

#### Tier 1

Children with no additional needs whose health and development needs can be met by universal services.

#### Tier 2

Children with additional needs that can be met through the provisions of 'early help' – a referral to CSC is not required.

#### Tier 3

Children with complex needs who need statutory and specialist services, a referral to CSC is required.

#### Tier 4

Children in acute need require immediate referral to CSC and/or the police.

Any assessment of risk should be based on the category level and the assessment of the child's needs. A separate risk assessment will need to be conducted, based on all known information on both the police's and CSC's databases. The risk assessment should be clearly documented on the police crime recording system.

## Chapter 5 Gangs and Organised Crime Groups

The term 'gang' is often open to interpretation depending on what areas of business you work in.

Often associated with an image of a group of young people or adults who are 'up to no good' or committing crime. Gangs can be highly organised and sophisticated in exploitation as seen within trafficking, modern slavery and county lines. It is therefore usually more appropriate to use the term Organised Crime Group (OCG) in these contexts rather than 'gang'.

The government paper *Safeguarding children and young people who may be affected by gang activity* distinguishes between peer groups, street gangs and organised criminal gangs.

- **Peer group** – A relatively small and transient social grouping which may or may not describe themselves as a gang depending on the context.
- **Street gang** – Groups of young people who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity.
- **Organised Criminal Gangs** – A group of individuals for whom involvement in crime is for personal gain (financial or otherwise). For most, crime is their 'occupation'.

It's not illegal for a young person to be in a gang – there are different types of 'gang' and not every 'gang' is criminal or dangerous. However, gang membership can be linked to illegal activity, particularly organised crime involving child trafficking, county lines and serious youth violence.

A child might be lured into an OCG or gang with the promise of status, wealth, belonging or protection. Other pull factors that might create barriers to engagement may include:

- peer pressure and wanting to fit in,
- gangs using grooming, coercion and control to manipulate and force them to do so,
- where they live,
- the need to feel respected and important,
- the need to make money or are promised rewards,
- wanting to gain status and feel powerful, or
- exclusion from school or family breakdown.

**Gangs can be highly organised and sophisticated in exploitation**

### Criminalisation of children

Children linked to Gangs are often not aware of the likely criminal consequences and associated violence. Children who come to police attention for gang-related violence (as victims or perpetrators) should be treated as 'children first' and potential subjects of exploitation who require assessment of their safeguarding needs. Professionals are reminded to keep the gang-related violence and exploitation links at the forefront of all decision making and safeguarding plans.

### National Definition – Organised Crime Groups (OCGs)

Individuals, normally working with others, with the capacity and capability to commit serious crime on a continuing basis.

### National Definition – Serious Crime

Crime that involves the use of violence, results in financial gain or is conducted by a number of persons in pursuit of a common purpose, or crime for a person on first conviction could reasonably expect to be imprisoned for three years or more.



## Chapter 6 Reporting suspicions of child exploitation to police

There are two agreed pathways for partners to access services within the Metropolitan police namely the Multi-agency safeguarding hub (MASH) and Child Abuse Investigation Team (CAIT) referrals desk.

Any suspicion of child exploitation must be documented on an MPS non-crime exploitation report. Intelligence reports must not be used to capture concerns of exploitation in lieu of crime reports. The MASH provide a key role in establishing those at risk of child exploitation.

An 87a referral must be made 'if there are concerns a child is being targeted or groomed and the child exploitation warnings indicators are present'. 'If a child is vulnerable to exploitation the 87a referral should not be made to the MPS until the Child demonstrates one or more of the CE warning indicators'.

All information shared on an 87A must have a correlating non-crime exploitation report. The CAIT referrals desk will produce the correlating non-crime exploitation report. Information gathered from partners will be risk assessed and must be documented on the exploitation report. This will contribute towards the assessment of risk and where exploitation indicators are identified as a threat to the child, relevant information will be passed to police and Children's Social Care to progress any investigation or intervention. **(See appendix F for CE 87A referral form).**

MASH will provide an initial assessment to enable police officers, social workers and professionals to progress the case assessment, plan to reduce the risk, support the welfare of the children and pursue any offenders.

Professionals will use the information to provide an initial assessment of the level of risk and identify further potential child victims of exploitation. The information is disclosed to inform investigations and tactical options for agencies involved with the children. This assessment and subsequent assessments would also identify any welfare needs for all known children.

### No Known Allocated Social worker

When a child exploitation-related Merlin or referral is received within a MASH and there is currently no Allocated Social Worker (ASW), the MASH will create a police exploitation report and add the relevant flags.

### Allocated Social worker (ASW)

Come to Notice and referrals containing exploitation concerns including arrests of note such as possession with the intent to supply drugs, where there is an ASW will be passed straight to that ASW who must then make a referral via generic child exploitation 87A to the relevant BCU CAIT referral desk. The CAIT referrals desk are then responsible for creating a non-crime exploitation report if one is not already in existence. Any strategy discussions held will be documented on the originating non-crime report.

A Child Risk Assessment Matrix will not be required on the non-crime report and

there is no expectation for CAIT referral desk staff to retain ownership of any non-crime exploitation reports they create. The police BCU is responsible for daily review of non-crime exploitation reports, governance flagging checks and setting investigation strategies. If the police BCU identifies that the non-crime report falls within the remit of Central Specialist Crime, the escalation process must be undertaken. The Vulnerability Assessment Partnership Team will undertake dip-sampling checks for governance and highlight organisational risk to the lead responsible officers at scheduled meetings. If immediate risk is identified this will be escalated to relevant BCU/Local Authority. **Appendix G relates to the Specialist Crime escalation form template.**

### Police officer reporting pathway

All police officers have a duty to safeguard and protect children under S11 of the Children Act 2004. The MPS' current procedures require all officers to complete a Merlin Pre-Assessment Checklist (PAC) for a child that comes to notice. If a child is at risk of child exploitation officers are now prompted on Merlin to create a non-crime report. There is also a specific category on the Merlin PAC to highlight child exploitation concerns and the relevant category. The initial investigating officer will complete the non-crime exploitation report even where no actual allegation of crime is made and no offence has been alleged. The Merlin reference number must then be cross-referenced onto the exploitation report.

When an officer identifies that a child (any person under the age of 18) is at risk of exploitation, the first consideration must be their protection and safety, and if the officer believes that the child is in immediate risk of significant harm, then police protection

must be considered and the appropriate procedures complied with.

Safeguarding responsibility for non-crime child exploitation investigations and interventions will rest with BCU police officers and partner agencies where the child resides. The difference with Looked after Children (LAC) is that the police are responsible when the child lives in their area but, they must interact with the owning social services department which could be a different region or area.

Where the exploitation is taking place away from where the child resides, the BCU where the exploitation is taking place will conduct any necessary enquiries on behalf of the owning borough. This includes when a suspect is arrested for breach of a Child Abduction Warning Notice. This will include liaison with Children's Services local to where the risks are apparent. For LACs, procedures set out in the London Child Protection Procedures will be followed. The lead police responsibility will remain with the borough where the child resides.

### Child Exploitation flagging

It is good practice to flag exploitation for information to be shared between the partnerships, risks are easily identifiable at the earliest point of intervention, to ensure that appropriate measures can be taken to best safeguard the child at risk. This enables information to be mapped and facilitates accurate analysis of Child Exploitation in London. Police flags and outcome codes are shown in Appendix E.

## Chapter 7 Intelligence submissions

**All intelligence helps provide information of a journey of a child. All relevant intelligence must be shared on an 87A. If there is intelligence about a specific child, a non-crime report must be created or updated.**

### Why is it useful?

The role of intelligence is crucial when safeguarding young people at risk of exploitation. Intelligence enables us to piece together a picture of what is being experienced by a child, it can help professionals to assess the level of harm and implement measures to protect the child.

Intelligence can further assist law enforcement to decide what best policing tactics can be used to pursue/disrupt offenders and manage locations of note or events linked to exploitation. We can also derive a deeper and more accurate strategic view of what child exploitation looks like in London.

### What is useful and what can be analytically produced from intelligence?

Professional curiosity is of utmost importance, asking appropriate and relevant questions guided by instinct may allow a child or partner agency to disclose information that will help enrich our tactical understanding of how exploitation is impacting that child, and more strategically in London. It is vital that intelligence is recorded on Crimint, which is the MPS' searchable intelligence recording platform.

### Social associates of the child

Such as the schools/pupil referral units they attend, their ages, nicknames, full names, risky associates, and if any of these associates belong to any specific groups. This level of detail can allow social network association charts to be drawn up and establish links between subjects, as well as possibly help to identify children who may not have come to our notice that could be subject to the same risks of exploitation.

### Locations of note

These are places that children gravitate towards, e.g. hotels, eateries, shopping venues, particular transport hubs, addresses, children's care homes and youth clubs. What times are they attending these locations, how are they travelling to these venues, is the venue a 'go-to' place for when the child has experienced a missing episode? These details can be fruitful in hotspot mapping, and it may help identify areas where children commonly go missing. Identification of such venues and geographic areas can assist in contextual safeguarding, and we can collaboratively work with partners to implement preventative measures.

### Online platforms which are frequently used by young people

As the digital world progresses, children have an increasing amount of exposure to the online world, as infinitely wonderful the internet can be there is also a degree of harm that comes with this and children can be exploited through online methods.

### How to record intelligence

Soft intelligence gleaned from partners on 87A must be placed on police indices at the earliest opportunity via your local Multi-Agency Safeguarding Hub. An immediate advantage of putting information on Crimint is because they are reviewed by police who can assist in safeguarding, address concerns and develop intelligence. When entering the information, Crimints must be flagged as 'Child Criminal Exploitation' or 'Child Sexual Exploitation' in the Subject Field and when applicable in the Information Markers when there is a potential exploitation or safeguarding concern.

Intelligence of note raised after the initial creation of a crime report/non-crime report or gathered after a missing episode should be placed on Crimint. If duly recorded, these can be viewed by the relevant police departments in their daily scanning. However, it is worth noting new crime/non-crime reports can be of support for future intelligence development, research and analysis. Intelligence of note will be shared with partners at a strategic Multi-Agency Child Exploitation Strategic Meeting /strategy discussion, etc.

Understanding which online sites and apps are trending with the children, and the influence these platforms, have is important for strategic understanding on how children can be exploited and groomed/recruited online.

There are also a number of other options open to professionals in which intelligence can be reported:

- M02 intelligence mailbox ([metintel@met.police.uk](mailto:metintel@met.police.uk)).
- Calling Police on **101** to report non-immediate risk concerns is an advisable way to make contact.
- Calling Crimestoppers, which is an anonymous reporting method on **0800 555 111**.
- Utilising reporting portals through the NSPCC.
- Via schools officers.
- Calling Childline's 24hr support line on **0800 1111**.
- Reporting online grooming concerns via the CEOP 'Thinkuknow' portal [www.ceop.police.uk/Safety-Centre](http://www.ceop.police.uk/Safety-Centre)
- Reporting child sexual abuse material online via the Internet Watch Foundation on [report.iwf.org.uk/en](http://report.iwf.org.uk/en)
- [www.fearless.org/en](http://www.fearless.org/en)

**If you think a child is in immediate danger, dial 999 for Police assistance.**

## Chapter 8 Accountability and organisational responsibility

The move to replace the Local Safeguarding Children's Board has introduced a team of Safeguarding Partners to each locality.

These Safeguarding Partners will be a team of key professionals from three sectors: the Local Authority (LA), the clinical commissioning group for any area that falls under the LA and the chief officer of police for any area that falls under the LA.

Together, these Safeguarding Partners will be in charge of agreeing on and implementing new safeguarding strategies that will strengthen their multi-agency working and in turn, improve the provision of safeguarding and child protection arrangements in the local area.

The announcement to make the switch from Local Safeguarding Children's Board to Safeguarding Partners was made in the updated statutory government guidance, 'Working Together to Safeguard Children', which was published in 2018.

You can access the full Working Together to Safeguard Children document including the new section on Safeguarding Partners on the [GOV.UK](http://GOV.UK) website

The government also published transitional guidance for Local Safeguarding Children's Board, LA, Safeguarding Partners, child death review partners and the Child Safeguarding Practice Review Panel. This document contains focused information on the switch from Local Safeguarding Children's Board to Safeguarding Partners.

You can access the Working Together to Safeguard Children transitional guidance on the [GOV.UK](http://GOV.UK) website

The Metropolitan Police have a strategic lead. They are responsible for public protection within London. The Commander works alongside MOPAC and Chief Executives across the 32 London boroughs. They have responsibility for 13 strands of vulnerability including exploited children. The Lead Responsible Officer works to the Commander and ensures other professionals are involved in the Strategic Governance Board which drives an agreed approach to safeguarding.

## Chapter 9

# Keeping children safe when moving placement

### Movement of Children – ‘Duty to share information’

#### Police Actions

Whenever a child is moved within London the new BCU must be notified and the crime report transferred immediately. The officer in charge (OIC) is responsible for this action, the line manager must ensure this is conducted within 24 hours and a verbal handover must be provided. Police National Computer markers must be removed and a new marker created with the new OIC, owning BCU and child’s new address. All trigger plans must be updated to reflect the new placement of the child. Whenever a child is moved out of the London police area, the Local Authority (LA) community safety team covering the child’s new address must be notified. The crime report must be transferred immediately via the MPS transfer crime transfer team Tel – **07826532602**.

#### Local Authority Actions

Prior to placing a child, a risk assessment should be completed to establish if there are any risks present such as gangs/high-harm offenders and to establish if the placement is suitable. An urgent placement of a child requires the completion of an 87b in order to identify potential risks. This guidance stipulates the owning LA must alert the new placement authority of a child placed within the host authority as per the Care Planning, placement and Case Review statutory guidance. As above, the receiving LA must be notified in writing, within 24 hours and a full verbal handover to be provided. (Ongoing risk management)

[www.gov.uk/government/publications/children-act-1989-care-planning-placement-and-case-review](http://www.gov.uk/government/publications/children-act-1989-care-planning-placement-and-case-review)

It is recommended that the placing authority retain primacy for the child placed and act as the lead agency for the purposes of directing and monitoring relevant action. The placing authority will also be the identified lead for the purposes of Multi-Agency Child Exploitation Strategic Meetings (MACE) referrals and will ensure they liaise with the host authority.

**MACE will ensure the correct systems/procedures are in place for all child placements relevant to their borough and maintain strategic oversight for governance.**

## Chapter 10

# Multi-agency meeting structure

Child exploitation is a complex issue and no single agency holds all relevant information on child safeguarding.

Multi-agency meetings are held as proactive information/intelligence-sharing forums to ensure all agencies build a joint picture of the child’s situation.

Professionals involved should not make assumptions that their information is already held by others, as this can lead to gaps in intelligence. The recording of minutes from meetings is an area where standards could

be improved with ease. This will improve the intelligence picture and assist with future decision making, the preferred method of recording is by creating a Crimint.

Strategy meetings/discussions are required in all child exploitation cases, as they are in every child protection investigation. The London Child Protection Procedures (CP procedures) explain the processes that should be followed by all agencies when holding a strategy meeting/discussion.

The CP procedures are updated twice a year so it is important that the online version is referred to. It is available at:

[www.londoncp.co.uk/chi\\_prot\\_enq.html](http://www.londoncp.co.uk/chi_prot_enq.html)

### Strategy discussion

Whenever there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, there should be a strategy discussion involving Local Authority (LA) Children’s Social Care (CSC) (including the residential or fostering service, if the child is looked-after) the police, health and other bodies such as the referring agency.

If feasible or within 24 hours a strategy discussion should also be held when a child is in police custody or about to be released from custody. The strategy discussion might take the form of a multi-agency meeting or phone calls and more than one discussion may be necessary. A strategy discussion can take place following a referral.

#### Purpose:

LA CSC should convene a strategy discussion to determine the child’s welfare and plan rapid future action if there is reasonable cause to suspect the child is suffering or is likely to suffer significant harm. CSC must utilise technology to conduct a strategy discussion to avoid time delays.

### Strategy discussion attendees:

A LA social worker, health practitioners and a police representative should, as a minimum, be involved in the strategy discussion. Other relevant practitioners will depend on the nature of the individual case but may include:

- the practitioner or agency which made the referral,
- housing,
- Youth Offending Service,
- LA community safety teams,
- the child's school or nursery, or
- any health or care services the child or family members are receiving.

All attendees should be sufficiently senior to make decisions on behalf of their organisation and agencies.

### Strategy discussion tasks:

#### The discussion should be used to:

- share available information and intelligence of note relating to the child or associated risks,
- agree conduct and timing of any criminal investigation,
- agree a terms of reference/information sharing agreement for the use of information obtained from active criminal enquiry and how it can be used to protect a child whilst maintaining investigation integrity, and
- decide whether enquiries under section 47 of the Children Act 1989 should be undertaken.

#### Where there are grounds to initiate an enquiry under section 47 of the Children Act 1989, decisions should be made as to:

- what further information is required if an assessment is already underway, and how it will be obtained and recorded,
- what immediate and short-term action is required to support the child, discuss a safeguarding plan and who will do what by when and whether legal action is required,
- the timescale for the assessment to reach a decision on next steps should be based upon the needs of the individual child, consistent with the local protocol and certainly no longer than 45 working days from the point of referral to CSC, and
- the principles and parameters for the assessment of children in need at chapter 1 paragraph 40 should be followed for assessments undertaken under section 47 of the Children Act 1989.

### Social workers, with their manager, should:

#### Convene the strategy discussion and make sure it:

- considers the child's welfare and safety and identifies the level of risk faced by the child. Review the need for CP/CSA medical,
- decides what information should be shared with the child and family (on the basis that information is not shared if this may jeopardise a police investigation or place the child at risk of significant harm),
- agrees what further action is required and who will do what by when, where an Emergency Protection Order is in place or the child is the subject of police powers of protection,
- consider a contextual safeguarding response to the child e.g. disrupting the location and peer group. Utilise local practice and contextual tools to support the risk assessment,
- records agreed decisions in accordance with local recording procedures, and
- agree a review date/follow up meeting.

### Health practitioners should:

- Advise about the appropriateness or otherwise of medical assessments and explain the benefits that arise from assessing previously unmanaged health matters that may be further evidence of neglect or maltreatment.
- Provide and coordinate any specific information from relevant practitioners regarding family health, maternity health, school health, mental health, domestic abuse, violence and substance misuse to assist strategy and decision making.
- Secure additional expert advice and support from named and/or designated professionals for more complex cases following preliminary strategy discussions.
- Undertake appropriate examinations or observations and further investigations or tests, to determine how the child's health or development may be impaired.

### The police should:

- Take the lead on immediate/short-term/long-term action required to disrupt the perpetrator.
- Discuss the basis for any criminal investigation and any relevant processes that other organisations and agencies might need to know about, including the timing and methods of evidence gathering.
- Lead the criminal investigation (LA CSC have the lead for the section 47 enquires and assessment of the child's welfare) where joint enquiries take place.
- Place all minutes of the meeting/agreed actions on Crimint and the review pages the non-crime exploitation report.

### Organised and complex meetings

When exploitation has been identified and there are concerns that the abuse involves one or more abuser, multiple victims, a group or location where additional focus is required to monitor peer networks and activity, consideration should be given as to whether this falls within the Organised and Complex Abuse procedures as outlined in chapter 8 of the CP procedures, available at [www.londoncp.co.uk/organised\\_complex.html](http://www.londoncp.co.uk/organised_complex.html)

Professionals from across partner agencies, BCUs and other LEA's should be invited to participate in sharing information. Intelligence and information gathered at these meetings should be fed into partner meetings so that a strategic response plan can be developed. Police should support information sharing and not just be recipients.

### Multi-Agency Child Exploitation Meeting (MACE)

The Multi-Agency Child Exploitation Meeting (MACE) has strategic oversight of all exploitation cases, information, intelligence and activity across each LA area and across BCU boundaries. It is recommended that each MACE agrees a Terms of Reference and a Service Level Agreement framework for sharing and responding to agency information. The agenda is designed to ensure that all key information and intelligence is captured in every case so that the key themes and trends can be identified. As each MACE will be capturing the same key information using the Victim, offender, location, themes (VOLT) mnemonic, this will make it easier to consistently share this information and intelligence among partners and across borders.

Police officers attending these meetings must create an intelligence report. Minutes of these meetings must be attached to the intelligence report.

Each MACE should have a coordinator who can prepare and circulate the agenda in advance of the meeting. This is an important role and must have oversight of any escalation process so that individuals and agencies can raise and address concerns. They will be responsible for any spreadsheet or tracker used by the LA. Each MACE should map and track its pre-planned activity, clearly identifying the relevant strand, nature of the activity, owner of the activity and the timeframe in which it should be completed. It is recommended that this activity be recorded/captured on a tracker and should be reviewed by the chairs at agreed intervals.

The MACE should have the capacity to remove blockages or obstacles in cases, as well as considering and directing resources and activity in response to trends identified from those cases. It is recommended these meetings should be convened on a monthly basis or at a maximum of six-week intervals. The meetings should be jointly chaired by the Local Basic Command Unit Police at Detective Chief Inspector or Detective Inspector level and by a senior manager from CSC (Assistant Director Safeguarding and Quality Assurance or a service manager from Operational CSC are considered to be at the requisite level).

The MACE is not designed to case manage individual cases but should identify, discuss and deliver a partnership response to short, medium – and longer-term themes, trends and patterns emerging from exploitation cases.

All cases must have followed existing child protection procedures prior to being discussed at the meeting, must have been subject to a strategy meeting/discussion and should have a corresponding police child exploitation crime report number for the child.

If an agency does not feel that a case is progressing, it should escalate the matter in accordance with the locally-agreed escalation process for resolution of professional disagreements. The enactment of escalation should be reported to the MACE and the 'lessons to be learnt' identified. However, there is still a requirement that the safety and action planning is conducted at a strategy or professionals meeting/discussion and this should not be left until a MACE meeting is scheduled.

In order to assist in the identification of themes and/or emerging trends, reports should be presented at the meeting in a format that ensures the key information and intelligence is properly captured. It is recommended that attendees should consider this key information using the **VOLT** mnemonic.

The key case information should be captured at a strategy meeting or pre-MACE. This will be reviewed at the MACE and allows the chair and all professionals supported by analysts to identify intelligence and areas of risk. The information can be transferred if the young person is placed in another area and complements the statutory placement forms. **Pre-MACE/MACE suggested attendees and recommended agenda can be found in Appendix D.**

**V** – Victim(s)

**O** – Offender(s)/perpetrators/persons of concern

**L** – Location(s)

**T** – Theme(s)

### Children transitioning into adulthood

Each MACE must ensure it has the capacity and ability to safeguard and signpost children transitioning into adulthood between ages 18 to 25. Exploitation can affect vulnerable adults equally and it is important there is an effective and robust referral process. There must be a strong relationship between CSC and Adults Social Care so that those who provide the appropriate services and support for these young adults are given the right information and opportunities to implement suitable safeguarding plans.

MACE must be able to signpost cases with confidence so that seamless and effective care is given to all those at risk of exploitation.

### Modern slavery and NRM

If you think that modern slavery has taken place, the case should be referred to the National Referral Mechanism (NRM) so that the Single Competent Authority can fully consider the case. Only certain organisations can make these referrals and these are called first responders. The police and social care are first responders, for a full list of these see the following link:

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales#first-responder-organisations>

It is best practice for NRM submissions to be made with multi-agency input and therefore it may be appropriate to explore this in a multi-agency safeguarding meeting such as a strategy meeting. In this discussion each organisation can contribute relevant intelligence and information and a lead agency

can be chosen to submit the referral.

You do not need to be certain that someone is a victim, only suspect that it may be possible. If the potential victim is under 18, a NRM referral must be made. Child victims do not have to consent to be referred into the NRM and must first be safeguarded and then referred into the NRM process. NRM referrals must now be made online, the following link provides guidance on this process including separate processes for children and adults:

[www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms](http://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms)

### Governance

The strategic MACE should be the strategic oversight panel and report directly to Child Exploitation Strategic Governance Board.

### Measurement of MACE success

By adopting the changes detailed in this document, the strategic meeting will be able to effectively demonstrate the success of its involvement and investment in combatting child exploitation through the collection of key information and intelligence, it will ensure there is a consistent data set collected that will inform both a local and a London-wide problem profile. This will provide the Strategic Governance Board with a much more accurate picture of London child exploitation picture.

this link is still not working in the PDF but works when copy and pasted into a browser.

## Chapter 11 Supporting child victims

### Supporting victims and their families must include a primary multi-disciplinary assessment of their circumstances.

Evidence has shown how important family is in helping children through recovery. Family support networks also need help to deal with the impact of child exploitation.

Local Authorities (LAs) can provide access to appropriate support, both on a local basis and through national organisations. Other agencies can help support the victim and their family. There are agencies that provide different specialist services and support for experiencing exploitation.

### Victims – barriers to engagement

Exploited children rarely approach police or Children's Social Care (CSC) directly, unless they are in immediate danger. Police officers and other frontline services must consider child exploitation when dealing with:

- missing children,
- criminal behaviour,
- substance misuse,
- anti-social behaviour or witnessing incidents involving violence of friends/potential associates, and
- Organised Crime Group association.

### Professional curiosity

Safeguarding children is everyone's responsibility. All children have the right to be safe and to be protected from all forms of exploitation. All practitioners whose work brings them into contact with children and families should be alert to the signs of child exploitation, know where to turn if they need to ask for help and be able to make referrals to CSC or police, if they suspect that a child is at risk of harm or is in danger.

Children will rarely disclose they are victim of exploitation and may not view themselves as such, if they do it will often be through unusual behaviour or comments. This makes identifying child exploitation difficult for professionals across all agencies. We know that it is better to help children as early as possible, before matters escalate. All agencies and practitioners need to work together and the first step is for everyone to be professionally curious.

While the presence of a potential indicator does not necessarily mean that a child is being exploited or has been trafficked, it will always warrant further investigation. Practitioners must be 'professionally curious' to determine further information in the interests of the child. It is essential that professionals exercise professional curiosity at all times, as it is likely that signs of any form of exploitation including child trafficking will be identified when dealing with an un-associated incident.

The professional's ability to get a child to engage will depend on:

- previous experiences of police and professionals,
- fear of not being believed,
- fear of being judged, and
- fear of negative repercussions for themselves or their families.

Children may face many challenges and are unlikely to approach or disclose to professionals through fear of reprisals, lack of trust between police and communities, embarrassment, community pressures and a lack of understanding of what an acceptable relationship is. There are particular groups that face additional challenges to accessing help which are as follows:

- Children with learning disabilities.
- Children with mental health issues.
- Sensitive disclosures such as sexuality.
- Cultural or religious impact of their disclosure.
- Fear of reprisals.
- Victims of trafficking.
- Being afraid they will be taken from their families and placed into care.
- Lack of immigration status.
- Living in an isolated/not confirmed community.

### Positive Language

There is no doubt that there are challenges for professionals and services when engaging with children, but the following have been identified as positive behaviours that, if displayed by professionals, would make it more likely for them to respond to and potentially disclose to professionals. These behaviours have been embedded as key themes as part of the University of Bedfordshire's Child Exploitation and Policing Knowledge Hub (2016) under the auspices of the Marginal Gains project:

- Being respectful and non-judgmental.
- Demonstrating empathy and compassion.
- Effectively eliciting and responding to children's accounts.
- Conveying information in a timely and appropriate manner.
- Having due consideration to confidentiality and discretion.
- Maximising continuity and engagement with children.
- Considering support needs.
- Facilitating choice and control for children.

*(Beckett H, Warrington C, Ackerley E and Allnock D, (2016) Children's voices research report: Children perspectives on the police's role in safeguarding: a report for HMIC.)*

### Section 45 Modern Slavery Act defence

Section 45 of the Modern Slavery Act provides a statutory defence for some offences. For a list of offences exempt from this defence, see schedule 4 of the Modern Slavery Act. [www.legislation.gov.uk/ukpga/2015/30/schedule/4](http://www.legislation.gov.uk/ukpga/2015/30/schedule/4)

To utilise the defence, defendants over the age of 18 must meet the following conditions as set out in the Modern Slavery Act:

- They committed the act because the person is compelled to do it.
  - The compulsion is attributable to slavery or to relevant exploitation.
  - A reasonable person in the same situation as the person and having the person's relevant characteristics would have no realistic alternative to doing the act.
- For children, the following conditions must be present:
- The person does the act as a direct consequence of the person being, or having been a victim of slavery or relevant exploitation.
  - A reasonable person in the same situation as the person and having the person's relevant characteristics would do that act.

The defendant must simply provide sufficient evidence of the above to 'pass the judge' e.g. lead a judge to conclude that there is a possibility that the defendant is a victim of modern slavery. If the evidence passes the 'judge' test then the prosecution will need to prove, beyond reasonable doubt, that the defendant is not a victim of trafficking. Investigators should not wait for a section 45 defence to be raised before considering it. It should be a consideration from the start of any investigation.

Similarly, assessments of the credibility of a potential victim should be carried on the strength of the evidence and on a case-by-case basis.

Investigations arising out of section 45 defences should be assigned to a different officer to act as the officer in charge. If a further interview is required, it should be completed as a Police and Criminal Evidence Act (1984)-compliant interview. Due to the nature of offences, victims of modern slavery may mean they require special measures. This should be considered from the outset of any investigation, particularly where there are juveniles involved. Further lines of enquiry that would assist in corroborating the accounts of potential victims should be explored at the earliest opportunity.

Investigators should be wary of how bias can influence decision-making around vulnerability and criminality. Specifically, investigators should avoid passing moral judgments on potential victims of modern slavery and should judge the strength of the evidence. Additionally, investigators should be aware of the tendency to view children from BAME backgrounds as older and more capable to make informed decisions. Please review the 'Essence of Innocence Project', from the American Psychological Association, for more information.

Where the section 45 defence is successful this should always be seen as a moment of intervention to safeguard the individual from the perpetrators exploiting them to commit crime. Good practice would be to request a multi-agency meeting to review interventions for this child both in safeguarding them and disrupting further exploitation.

## Chapter 12

# Safeguarding children in custody

When a child enters custody this is a pivotal opportunity to support and safeguard them away from those exploiting them. This is an opportunity to provide safe support and help identify perpetrators of exploitation.

Met Detention recognise their duty of care to protect the vulnerable and safeguard children. Children are, by nature of their age, described as legally vulnerable up to the age of 18 and will require additional safeguarding measures which recognise that whilst in custody, they will be at a point of crisis.

The role of the custody sergeant recognises the need to understand this vulnerability and whilst they are the gatekeeper to detention, their key role is to identify, assess and manage the health, welfare and safeguarding needs of the child and to observe that continued detention is both necessary and proportionate. To achieve this, they remain impartial to the investigation and comply with Police and Criminal Evidence Act (1984) (PACE) Code C, which sets out the police and partner obligations in relation to the treatment of detainees.

Vulnerability may result from any environment or a child's personal circumstances or behaviour, indicating that there may be a risk to that person or another. Those who come to notice of the police during the custody period will require an appropriate response and should include safeguarding conversations with investigating officers and appropriate multi-agency information sharing and intervention.

Met Detention achieves this by:

- providing children in custody a safe environment from harm;
- looking to identify vulnerability, safeguarding or exploitation issues at booking in;
- ensuring immediate medical/welfare needs are met and monitored throughout the custody period;
- evaluating risk by using the Threat Harm Risk Investigation Vulnerability Engagement Prevention and Intervention (THRIVE+) model and National Decision Making principles and continue to monitor and review care plans throughout detention;
- notifying Children's Social Care (CSC) of the child's arrest (within 4 hours)/ Multi-Agency Safeguarding Hub (MASH)/diversion workers within the golden hour (Op Harbinger) and a Merlin must be completed in cases when a child enters custody;
- ensuring Intelligence of note is recorded in Crimint;
- ensuring an appropriate adult or guardian is called as soon as practicable and information is shared both in relation to the reasons for arrest but, any welfare needs identified;
- holding regular safeguarding conversations with the officer in charge to ensure
  - 1) Merlin is completed
  - 2) our risk assessments and care plans are accurate and shared
  - 3) significant welfare issues are discussed and escalated. The fact that a conversation has taken place is recorded on the custody record and any relevant facts which influence a change in the risk assessment or care plan;

- ensuring the PACE review is based on THRIVE+ and National Decision Making Model principles and in the case of children, their needs come first;
- prior to releasing the child from custody or within 72 hours, if child exploitation warning indicators are present a strategy discussion must take place between a supervisor, the relevant Local Authority (LA), health, schools and other professionals key to safeguarding the child. All potential risks posed to the child must be discussed and a Multi-Agency safeguarding plan must be implemented. If this cannot be completed prior to releasing the child CSC must be aware; and"
- completing the Pre Release Risk Assessment which identifies any post-release vulnerabilities and ensures supportive control measures have been discussed with the detainee, officer in the case, parent/guardian and referral material provided.

### Op Harbinger

This is an information sharing memorandum of understanding between Met Detention/ BTP/City of London Police and LAs CSC/ MASH in which details of the arrested child, any person arrested with them and the nominated appropriate adult/guardian are shared within a one-hour period from booking in. The LA will reciprocate with a call back within one hour and provide the custody sergeant with any information which may help manage the child's welfare or safeguarding needs, which may not be known to police. Currently, this is an ongoing project rolling out across London.

### Youth workers in custody

Met Detention currently have embedded youth workers in several custody suites as part of a long-term evaluation into how we best use custody space and time. LA provide youth workers, detached workers from the St Giles Trust and the DIVERT charity, albeit they differ slightly in their main catchment of 18 to 24 years old. In addition to these trials, NHS Liaison and diversion workers operate in all suites and provide health advice to children and can recommend NHS referral pathways outside of custody, including issues relating to mental health.

## Chapter 13

# Missing children

Missing children can sometimes be at increased risk of exploitation and should be reported as missing to police at the earliest opportunity.

Once a missing child returns home or is located, it is important that the return is managed by relevant partners to identify any risks the child has been exposed to.

There are two stages to the process:

The Police Prevention Interview (formerly known as the Safe and Well Check) and the Return Home Interview, the offer of which is the statutory responsibility of the Local Authority (LA) responsible for the care of the child.

### Missing Person Coordinator

The MPS has in place Missing Person Coordinators (MPCs) who support BCUs in their problem-solving approach to missing persons.

A significant element of the MPC role is working with care providers whose young residents are often more at risk of sexual or criminal exploitation. By developing working relationships with care providers, the MPS aims to perform an integral role in the safeguarding process to manage and reduce missing incidents. Each London borough is served by an MPC, providing an essential link between care providers, missing person units, the MPS sexual offences and exploitation command and Safeguarding Partners. A coordinator may attend Multi-Agency Child Exploitation Strategic Meetings and/or strategy meetings where necessary.

### The Philomena Protocol

The MPS has introduced the Philomena Protocol as an important tactic to increase partnership and supportive engagement with Children's Social Care (CSC) placements across London, and to highlight the importance of information sharing. This process builds on existing expectations set out in the London Child Protection Procedures in terms of the maintenance of information sharing forms and the preparedness of care professionals to accurately reflect risk to police at the point of reporting. In addition, CSC placements in London are expected to report children in their care as missing via the online portal – this approach prevents delays experienced via the 101 system and requires the informant to outline the risk concerns and as much information as is held to allow police to respond proportionately.

The engagement opportunities created by the Philomena Protocol will include the police roles of youth engagement officers and youth problem solvers alongside BCU safeguarding officers and the missing person coordinators. This allows for greater opportunity to support care placements in improving practice and to optimise information sharing.

In 2016, the College of Policing issued new Authorised Professional Practice and this altered the definition of 'missing'. The definition of missing is 'Anyone whose whereabouts cannot be established will be considered as missing until located, and their well-being or otherwise confirmed.'

'Absent' is not now separately defined and in 2020, the MPS ceased any handling of cases as 'absent'.

Given this update, it is important to appreciate that each case should be risk assessed on merit and the appropriate police and partner action taken. For example, children will no longer be automatically graded as medium risk according to policy but, risk-graded according to the circumstances of the missing episode taken together with relevant historic information – this will include low risk. This demands that children are reported as missing not out of procedural habit but according to risk concern. This will allow for a relevant and proportionate policing response.

Additionally, the police can now ensure missing person reports reflect specific 'enhanced concerns' including youth violence, criminal and sexual exploitation and mental health.

Once a child returns or is located, it is important that they are fully debriefed to identify any risk the child has been exposed to.

### Police Prevention Interview – police responsibility

The purpose of this interview is to establish whether the child has come to harm whilst missing and to establish what can be done to prevent future missing occurrences. If the child makes an allegation of crime that occurred whilst they were missing or that contributed to him/her running away, the police will record this allegation and take appropriate action. The methodology of the Police Prevention Interview is expected to be proportionate to the level of risk apparent during the investigation. The police can therefore approach this three ways – either by speaking to the relevant care professional on the phone to ascertain pertinent detail, to speak with the individual on the phone to ascertain pertinent detail or ensure this

is carried out face-to-face. In order to allow for the most appropriate police officer to complete this, the MPS allows 24 hours for completion from the time the child was located or returned home.

The outcome of the prevention interview is recorded to the Merlin investigation report and automatically shared to the relevant LA (likewise the incident is shared initially at the creation of the missing person report).

### Independent Return Home Interview

Children should be informed of their rights and encouraged to talk about the incident with someone independent of their parent/carer upon their return. Providing children with the opportunity to talk is key to safeguarding them.

The interview and the actions that follow from it must:

- identify and deal with any harm the child has incurred (his/her medical condition should be discussed immediately and any need for medical attention assessed), and
- understand and address the reasons the child ran away (the child's living arrangements/ placement or care plan may require review) and try to avoid it happening again.

The child must receive the interview with the independent person within 72 hours of being located or returning from a missing episode.

For looked after children, it is the responsibility of the residential unit manager/ supervising social worker and placing authority to ensure that this happens.

For children living in the community, the LA's

CSC have responsibility for ensuring that the opportunity for an independent interview is provided. Intelligence captured must be shared with the relevant BCU officers and concerned boroughs in form of a Crimint. If appropriate, record intelligence in terms of location, associations, themes, emerging threats and development opportunities.

Many children who run away or go missing need to build up trust before they will discuss in depth the reasons why they decided to abscond. The independent person could be a social worker/professional/a statutory organization who has permission from the relevant local authority e.g. Children's Society who have a relationship or rapport with the child, who has known barriers in disclosures and information sharing. The independent interview should be with someone the child trusts and who is separate from the police and children's social services interview. The child should be asked who they wish to speak with. Information obtained from the return interview must be shared with the relevant BCU and partners in accordance with local guidelines.

The case should remain open for a

short period of time to enable continued intervention and safeguarding.

Allegations or information suggesting a risk of child exploitation should be submitted on a non-crime 588/00 Child Exploitation CRIS Report

### Enhanced Concerns– Merlin

In April 2019, Merlin was upgraded to include a new data field to capture 'Enhanced Concerns'. The field is mandatory across PAC's, ACN's, Mispers and Found reports. Both child sexual exploitation and child criminal exploitation are included within the options and they must be used wherever it is felt they may be at risk.

## Chapter 14 Investigations

Child exploitation is often difficult to investigate, especially when the victim does not see themselves at risk and no disclosures have been made.

**Appendix H** provides a large number of tactical options that police officers and other professionals can consider to safeguard victims, target offenders and reduce crime in identified venues.

Best practice guidance for child exploitation investigations e.g. investigation strategies, supervision templates and closing reports can be found on the MPS Public Protection intranet site. **All officers who work within safeguarding field are strongly recommended to utilise this intranet site.**

Child exploitation is not a specific criminal offence. It encompasses a range of different forms of serious criminal conduct and a number of individual offences. However, many forms of child exploitation constitute modern slavery and therefore the Modern Slavery Act and its relevant powers should be closely considered.

In assessing whether a child is a victim or at risk of becoming a victim of criminal exploitation, careful consideration should be given to the following: Please see link to the Home Office disruption toolkit.

[www.gov.uk/government/publications/child-exploitation-disruption-toolkit](http://www.gov.uk/government/publications/child-exploitation-disruption-toolkit)

Investigators should liaise with the Crown Prosecution Service (CPS) at the earliest opportunity to secure Early Evidential Advice to seek appropriate advice as this can help to outline an effective investigative strategy which will strengthen the prosecution case.

Children who are sexually abused or exploited often find it difficult to report or disclose information about the abuse at the time. It is good practice to spend time building a rapport with a victim and this can take several months. If no disclosure has been made and if all other lines of enquiry have been completed, it is MPS policy to revisit the victim six months later to establish if they are ready to make a disclosure. Officers may wish to keep Police National Computer markers live even when the crime report is closed to gather intelligence.

### Criminal justice support for victims

Sound preparation between police and children's services will increase the likelihood of providing effective witness care prior to a criminal trial. This should be completed jointly utilising the multi-agency partnership and the specific skills that each agency provide. The support required should be assessed on a case-by-case basis.

A victim care strategy should be driven by the victim's needs and include details such as the following:

- Using special measures to support the victim/witnesses.
- Using intermediaries.
- Reassuring them of their safety.
- Keeping regular contact and updating with trial dates.
- Encouraging and assisting a pre-court visit.
- Providing the victim/witness with an age appropriate child witness pack.

- Transporting to and from court.
- Debriefing them at the end of each day.
- Considering a one-to-one meeting with the prosecuting barrister.
- Bail management of suspected perpetrators.
- Arranging attendance at sentencing as part of the closure process, if deemed appropriate MPS and Children's Social Care (CSC) to discuss in the best interests of the victim.
- Arranging rehousing through the Local Authority in extreme cases, e.g. where there is further risk of child exploitation or threat to life.
- Assistance with the Criminal Injuries Compensation Authority (after trial).

It is a fundamental aspect of the CPS policy and the multi-agency practice guidance on pre-trial therapy that, the best interests of the child are paramount when deciding when and in what form therapeutic help is given. Further details can be found in the multi-agency practice guidance entitled Provision of Therapy for Child Witnesses Prior to a Criminal Trial.

### Child exploitation forensic strategy

In all cases of suspected exploitation (even where there is no disclosure), the standard operating procedures for rape for recovering evidence should be considered. This is particularly relevant when completing a missing person debrief. Consideration needs to be given to the use of Early Evidence Kits, preservation of crime scenes (including the child), seizure of clothing (particularly underwear), phones and electronic devices that may hold potential intelligence and evidence to identify adult abusers. Phones should be seized within the current legal framework and force guidelines.

Cases of criminal exploitation can be varied and the forensic strategy should be tailored to the type of criminal offending that is being committed. The most common type is the supply of illegal drugs, the transportation of illicit finance and/or the carrying of weapons. In these cases physical forensic examination of the evidence may assist in connecting the exploiter to the evidence. Additionally, digital forensics e.g. examination of mobile devices is key. It is important to clarify the powers under which digital devices have been seized under, as consideration must be given to the extent of digital examination that is legally permissible depending on how the device has been obtained.

If the potential victim of trafficking has been arrested for suspected criminality then phone examinations may serve the dual purpose of investigating the original offence and any connected modern slavery offences. Voluntary submissions with written consent from parents/guardians should be utilised whenever possible. Initial consultation/engagement with an Operational Forensic Manager (CSM) or Hub Forensic Manager at the earliest stage is advised to discuss any forensic opportunities or any forensic crime scene support to ensure best evidence.

Professionals who have contact with children in the course of a child exploitation investigation may identify evidence during their contact. Professionals are advised to make a written record of what they have seen and seek advice from a police officer.

### Visually recorded interviews

Visually recorded interviews (VRIs) must be planned and conducted jointly by CSC and the police in accordance with Achieving Best Evidence in Criminal Proceedings: Guidance for Vulnerable or Intimidated Witnesses, including Children (Home Office, 2002). More information is available on the CPS website.

VRI primary purposes

- Evidence gathering for criminal proceedings.
- Examination in chief of a child witness.
- Relevant information from this process can also be used to inform S47 enquiries, subsequent civil childcare proceedings or disciplinary proceedings against adult carers.

In accordance with Achieving Best Evidence, all joint interviews with children should be conducted by those with specialist training and experience in interviewing children. Specialist/expert help may be needed.

### Section 28 Youth Justice Criminal Evidence Act

#### Pre-trial visually recorded cross-examination or re-examination

Where a visually recorded examination of the witness has taken place at an earlier date prior to the trial. This may be admitted by the court as the witness's cross-examination and re-examination evidence in the Crown Court. This can only be applied for where there has been a S27 direction for a VRI to be admitted as evidence and when a victim or a witness meets the vulnerable criteria. A visually recorded examination will be automatically admissible, upon application, unless this would not be in the interests of justice or would not maximise the quality of the complainant's evidence. Please see [www.cps.gov.uk/legal-guidance/special-measures](http://www.cps.gov.uk/legal-guidance/special-measures) for further guidance.

### Third-party material

This joint protocol between the CPS and the police draws together the existing guidance and best practice on identifying, inspecting, reviewing and obtaining third-party material. These obligations and responsibilities are set out in a number of current published documents, including the Criminal Procedure and Investigations Act, the Disclosure Manual and the Attorney Generals Guidelines.

It sets out the cooperation arrangements between the parties in respect of the investigation, the institution and the prosecution of offences in which there is third-party material and the relevant duties and functions of the investigator, the disclosure officer and the prosecutor.

This protocol is consistent with the 2013 Protocol and Good Practice Model on Disclosure of Information in cases of alleged child abuse and linked criminal and care directions hearings, which provides the framework for the police and CPS to obtain disclosable material from local authorities, and for applications to be made to the family court, in all cases involving children of 17 and under.

Police will be encouraged to engage with third parties who frequently encounter a criminal investigation, which includes:

- owners of CCTV material,
- social services departments,
- schools,
- medical practitioners, and
- counsellors.

Investigators should obtain relevant material

with the help of partners and third parties as soon as possible. A collaborative approach should be adopted from the outset to prevent delays of requested material. Where necessary, signed consent should be obtained from the victim, the victim's parents or their carer, for access to the relevant records. This material may include medical records or family and civil proceedings documentation. Third-party material can also help to find corroborative evidence to support or disprove the allegation. This can include observations by carers relating to changes in the victim's behaviour or evidence of grooming (e.g. receiving gifts) but can also come from other sources e.g. 999 tapes, house-to-house enquiries or photographs.

**Further guidance can be found in the CPS disclosure manual [www.cps.gov.uk/legal-guidance/disclosure-manual](http://www.cps.gov.uk/legal-guidance/disclosure-manual)**

### Use of experts

Experts may help to explain this type of behaviour if required please contact your local CSM.

## Chapter 15 Trafficking and the NRM

The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.

Modern slavery is a complex crime and may involve multiple forms of exploitation. It encompasses human trafficking, slavery, servitude, and forced or compulsory labour.

An individual could have been a victim of human trafficking and/or slavery, servitude and forced into compulsory labour. Victims may not be aware that they are being trafficked or exploited, and may have consented to elements of their exploitation, or accepted their situation. If you think that modern slavery has taken place, the case should be referred to the NRM so that the Single Competent Authority (SCA) can fully consider the case. You do not need to be certain that someone is a victim. If the potential victim is under 18 a NRM referral must be made. Child victims do not have to consent to be referred into the NRM and must first be safeguarded and then referred into the NRM process.

From 1 November 2015, specified public authorities are legally required to notify the Home Office about any potential victims of modern slavery they encounter in England and Wales. The 'duty to notify' provision is set out in the Modern Slavery Act 2015, and applies to all police forces and Local Authorities (LAs) in England and Wales, the Gangmasters Licensing Authority and the National Crime Agency.

The NRM online system provides optional and mandatory fields to enable you to submit the referral. Adult cases who do not provide consent to be referred into the NRM process, automatically become duty to notify referrals on the new online system.

There is a link between trafficked children and exploitation. All children, irrespective of their immigration status, are entitled to safeguarding and protection under the law. Referrals to the NRM should be for all potential victims of trafficking and modern slavery, who can be of any nationality and may include British national status children, such as those trafficked for child sexual exploitation or those trafficked as drug carriers internally in the UK. Children moved from (or through) one borough to another, for the suspected purposes of criminal exploitation, should be considered trafficked. Trafficking can also occur within the borders of the same LA and can present additional challenges for it to be recognised.

Under the Palermo Protocol, children are identified as a special case for whom only two components are required – movement and exploitation – because a child cannot give consent to being exploited (including sexually exploited) even if they are aware/agreeable to being moved. Therefore, the means of trafficking (e.g. threat, abduction, deception, etc.) are not applicable in cases involving children.

## First responders

Police/social workers/border force should feel empowered to recognise and act on incidences of trafficking. Notwithstanding current child protection procedures, the Modern Slavery Act 2015 legislates against human trafficking and defines the offence as the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person, having control over another person, for the purpose of exploitation.

Any child who is recruited, transported, transferred, harboured or received for the purposes of exploitation is considered to be a trafficking victim, whether or not they have been forced or deceived. Even when a child appears to have submitted willingly to what they believe to be the will of their parents or accompanying adults, it is not considered possible for a child to give informed consent.

The local enforcement of this act against suspected child exploitation perpetrators is a proportionate and justified measure to protect the most vulnerable from harm. You do not need the consent of the child or young person in order that a referral can be made to the NRM. When a NRM referral has been made, a Police Crime Report should be created for trafficking. If Children's Social Care make a referral to the NRM, they should inform the police so the trafficking report can be investigated.

First responder organisations have the

following responsibilities as set out by the SCA:

- To identify potential victims of modern slavery and recognise the indicators of modern slavery.
- To gather information in order to understand what has happened to them.
- To refer victims into the NRM via the online process or via the archived paper referral form in exceptional cases (in England and Wales this includes notifying the Home Office if an adult victim doesn't consent to being referred).
- To provide a point of contact for the SCA to assist with the Reasonable and Conclusive Grounds decisions and to request a reconsideration where a first responder believes it is appropriate to do so.

A first responder is an individual working at a first responder organisation that is involved in discharging one of the duties of the organisation listed above.

The first responder's role does not end at the point of referral and this is particularly the case for those continuing to work with the potential victim after that date.

Additional information can be sent to the SCA at any stage after referral up until they make their final Conclusive Ground decision. It can often take a long time for a victim to feel safe enough to disclose their experiences to a trusted adult. Given this, the initial NRM may only present a limited picture and so contributing information at a later date may be vital in obtaining the right NRM decision.

Any relevant new information regarding the potential victim's experience of exploitation will help them with their decision. Information should be sent to [nationalreferralmechanism@homeoffice.gov.uk](mailto:nationalreferralmechanism@homeoffice.gov.uk)

When submitting the referral it is important for the first responder to gather information from other professionals working with the potential victim to ensure the SCA has as much relevant information as possible when making their decision. This includes but is not limited to social care, youth offending teams and charity partners. It is then the responsibility of the first responder to collate this information and send it to the SCA.

First responders also have a role in asking for an NRM reconsideration where relevant. A reconsideration can be requested at any time if more information becomes available or there are concerns about the original decision.

A reconsideration will only happen if the SCA deems there to be grounds for one.

## Managers

The NRM should be considered a useful tool in the disruption of child exploitation to mitigate further risk and achieve best evidence against those that seek to exploit and abuse children. Together, the NRM and human trafficking legislation within the Modern Slavery Act should form part of any investigation or enforcement plan and be considered alongside pre-existing disruption tactics. Periodic reviews of criminal investigations should consider the ongoing necessity for the NRM and whether evidence of trafficking is suspected.

More information about the NRM is available at: [www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking](http://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking)

## Child criminal exploitation and the NRM

When encountering a child committing a criminal act it is important to consider whether the child may be a victim of trafficking and therefore that the crime may have been committed under the control of others.

Where the crime has involved children being moved or held in a location including to distribute drugs through the county lines model, this constitutes human trafficking and an NRM should be submitted regardless of whether the young person self-identifies as a victim or even if they give a no comment interview. It is not the responsibility of the child to recognise their victimhood but our responsibility as professionals to pick up on indicators and recognise their being a potential trafficking victim.

### Perpetrators/suspects/persons of concern

Child exploitation has a Pan London Problem Profile. Officers must update crime reports with suspect details, remembering offenders may use aliases or nicknames to conceal their identity. All of this information feeds into the Pan London child exploitation Problem Profile and assists in identify and disrupting high harm offenders.

Officers should ensure that children are returned home only where it is safe to do so and a risk assessment must be completed. Where there are concerns about the involvement of, or repercussions from, family members, children should be spoken to privately. Offenders may groom victims in order to manipulate them. This includes distancing them from friends and family to control them. The power and control exerted by the offender is designed to increase the dependence of the victim as the exploitative relationship develops. Offenders often use flattery and attention to persuade victims to view them as a boyfriend/girlfriend.

Some offenders get satisfaction from exerting control over victims through coercive and manipulative behaviour. It is believed that this is done not only to commit offences, but also as an end in itself. In this respect, the psychological profile of this type of offender appears to resemble that of a domestic violence offender. It is important to correctly record and flag potential offenders in order that an accurate profile can be gained on current offending patterns.

## Appendix A Abbreviations

<b>APP</b>	Authorised Professional Practice
<b>ASB</b>	Anti-Social Behaviour
<b>ASW</b>	Allocated Social Worker
<b>BCU</b>	Borough Command Unit
<b>CAID</b>	Child Abuse Image Database
<b>CAWN</b>	Child Abduction Warning Notice
<b>CBO</b>	Criminal Behaviour Order
<b>CCTV</b>	Closed-circuit Television
<b>CCE</b>	Child Criminal Exploitation
<b>CEOP</b>	Child Exploitation & Online Protection Centre
<b>CFT</b>	(Police) Criminal Finance Team
<b>CP procedures</b>	London Child Protection Procedures
<b>CPN</b>	Community Protection Notice
<b>CPS</b>	Crown Prosecution Service
<b>CRIS</b>	Crime Report Information System
<b>CSC</b>	Central Specialist Crime
<b>CSC</b>	Children's Social Care
<b>DBS</b>	Disclosure and Barring Service
<b>DCI</b>	Detective Chief Inspector
<b>DI</b>	Detective Inspector
<b>DWP</b>	Department for Work and Pensions
<b>EPO</b>	Emergency Protection Order
<b>GAIN</b>	Government Agency Intelligence Network

<b>IAT</b>	Initial Assessment Team
<b>IIOC</b>	Indecent Images of Children
<b>IOM</b>	Integrated Offender Management
<b>IRC</b>	Immigration Removal Centres
<b>LA</b>	Local Authority
<b>LAC</b>	Looked after child
<b>LRPPU</b>	London Region Protected Persons Unit
<b>MAPPA</b>	Multi-Agency Public Protection Arrangements
<b>MARAC</b>	Multi-Agency Risk Assessment Conference
<b>MASM</b>	Multi-Agency Strategic Meeting
<b>MASH</b>	Multi-Agency Safeguarding Hub
<b>Merlin PAC</b>	Merlin Pre-Assessment Checklist – process for identifying needs of children for referral to CSC
<b>MPC</b>	(Police) Missing Person Coordinator
<b>MPS</b>	Metropolitan Police Service
<b>NCA</b>	National Crime Agency
<b>NDM</b>	National Decision Making Model
<b>NGO</b>	Non-Governmental Organisation
<b>NPT</b>	Neighbourhood Policing Team
<b>NRM</b>	National Referral Mechanism
<b>NTAC</b>	National Technical Assistance Centre
<b>OCG</b>	Organised Crime Group
<b>PACE</b>	Police and Criminal Evidence Act (1984)

<b>PNC</b>	Police National Computer
<b>PP</b>	Police Protection
<b>PR</b>	Parental Responsibility
<b>PSPO</b>	Public Spaces Protection Order
<b>RARA</b>	(Police) Risk assessment framework – Remove, Avoid, Reduce, Accept
<b>RIPA</b>	Regulation of Investigatory Powers Act (2000)
<b>SHPO</b>	Sexual Harm Prevention Order
<b>SPOC</b>	Single point of contact
<b>SRO</b>	Sexual Risk Order
<b>STRO</b>	Slavery Trafficking Risk Order
<b>STPO</b>	Slavery Trafficking Protection Order
<b>THRIVE+</b>	Threat Harm Risk Investigation Vulnerability Engagement Prevention and Intervention
<b>VAPT</b>	Vulnerability Assessment Partnership Team
<b>VOLT</b>	Victim, offender, location, themes.
<b>VRI</b>	Visually recorded interview (also referred to as an ABE)
<b>YOT</b>	Youth Offending Team

## Appendix B

# Child exploitation warning signs - 'SAFEGUARD'

### **S** Sexual identity, wellbeing and choice

Sexually transmitted infections (particularly repeat infections), pregnancy, terminations, changing or out of character sexual behaviour, experiencing violence/coercion with sex. Exploring sexual relationships or feeling pressured to perform sexual acts in exchange for status/protection, possessions, substances, alcohol or affection in an unsafe context or environment. Unable to disclose sexual orientation and fearful of societal responses. Links to Organised Crime Groups (OCGs) frequenting in known exploitation 'hot spot' areas. Talks about or witness to recent incidents of violence. Admits to carrying or will carry a weapon for self-protection.

### **A** Absence, truancy and going missing

Truancy from school, missing from home or care frequently, and repeat incidents travelling outside borough/town when missing, and unexplained absences. Arrested or found in a county force location, possibly linked to county lines. Missing for 72 hours or more, unaccounted absences throughout the day. Generally feels unsafe and no fixed abode.

### **F** Family and home

Current/suspected abuse in the family, lack of parental relationship. Sexual, physical, emotional abuse and neglect, risk of forced marriage or honour-based violence, female genital mutilation, domestic violence, substance misuse, parental mental health concerns, bereavement, parental and sibling criminality, experiences of homelessness or sofa surfing, living in care or temporary accommodation, and immigration status. Family-linked serious and organised criminality and family member's victims of serious violence.

### **E** Emotional and physical health

Suicidal thoughts, plans and attempts, self-harm, low self-esteem/confidence/worth, learning difficulties, changing emotional wellbeing and signs of poor mental health, unexplained injuries and changes in physical appearance. Concerns regarding experiences of Trauma and PTSD.

### **G** Gangs, groups, age gaps and crime

Involvement in gangs or gang-affected family, peers or siblings, concerns of abusive peer groups, involvement with older individuals or groups, lacking friends in the same age groups, older 'boyfriends', sudden changes in peer groups, bullying, both online and offline, friends of young people experiencing child sexual exploitation. Victim of violent related crime, arrested for serious and organised criminal offences. Friends and peers linked to OCGs. Arrested for carrying a knife/blade or for holding a firearm. Associating with much older people or stopped by police in car with older unrelated adults. Arrested for possession with intent to supply Class A Drugs. Possession of large quantities of drugs (involvement in county lines).

### **U** Use of technology and sexual bullying

Appeared as a perpetrator or victim in online social media relating to criminal or sexual exploitation. Sexting (both sending and receiving), being listed on social network pages in relation to sexual activity and/or named in videos, secretive use of the internet/phones/social networking sites, sudden behaviour changes when using the phone or internet, control via phone or internet, and multiple or secretive social networking profiles. Presence on gang videos, threatened or groomed on social media. Images or videos may include drug taking, weapons, money, peers and adults thought to be associated with gangs/criminal activity. Being coerced and controlled to post inappropriate language/information or sexual pictures when contacted. Suddenly stopped using any social media.

### **A** Alcohol and substances

Daily/regular or reliance on both legal and illegal substances and it's unclear as to how this is being financed or hospitalised due to drug or alcohol consumption. Child has been arrested for drug possession with intent to supply on a county line or in a 'trap house' or 'bando'.

### **R** Receipt of unexplained gifts or money

Unexplained money, mobile phones, phone credit, items, clothes, money, new nails, travel in taxis, gifts where payment is required at a later date, and worries about having debts. No money problems when family struggles financially, has monies being transferred through their bank account.

### **D** Distrust of authority figures

Resistance to communicating with parents, carers, teachers, social services, health, police and others. Negative view of authority figures and professionals.

## Appendix C

# Additional child exploitation risk indicators

Risk indicators
Race/Gender/Sexuality/Disability/Religious beliefs
Physical harm, threats of Violence, sexual and emotional abuse, pregnancy, STIs and blackmail
Drug abuse and alcohol dependency
Unable to leave the Organised Crime Group and subsequent criminality
Financial difficulty/Debt bondage
No access or difficulty accessing mainstream education
Being entered into private fostering arrangement
Being rejected by peers, faith or social group/family
Isolated and lonely or wanting to belong
Stressed or depressed
Becoming angry at other people or the government
Being groomed online or in person
Exposure to violent material and other inappropriate information
Psychological manipulation
Pressure from persons linked to extremism
Victim or witness to race or religious hate crime
Accessing extremist material online

## Appendix D

# Multi-agency Child Exploitation Meeting (MACE)

### Suggested MACE agenda

#### Agenda

#### Part 1 (Strategic overview/Identify case blockages/Setting actions to mitigate risk)

##### Actions

Review of minutes/actions. Case overview – presented under the **VOLT** mnemonic.

##### Victim

Child criminal exploitation/Child sexual exploitation/ National Referral Mechanism (NRM) and confirmed or potential cases of trafficking.

##### Offenders

Repeat offenders, known links to children, cross-border, owning BCU and who has responsibility.

##### Location

Repeat locations/Crime generators.

##### Themes

Emerging themes e.g. new apps, UCK parties and Blue Whale challenges.

##### Discharged cases

Agencies may decide to close their case first and MACE is the forum confirming the reasons.

##### Cross-border

Issues that impact multiple BCU/boroughs including overview of children placed in/ outside of the borough. Mapping and the sharing of this intelligence is key.

##### Trafficking/NRM

Confirmed and potential cases.

#### Part 2 (Forward thinking)

##### Joint intelligence presentation

Reports of note/Intelligence taskings/ Identifying risk children and top ten offenders. The findings should feed into the child exploitation profile.

##### Information Sharing

Information to be shared from other forums, such as MARAC, Gangs, Missing and Multi-Agency Public Protection Arrangements (MAPPA). Best practice documents to be shared with BCUs to promote joint working.

##### Child Exploitation Action Plan

All BCUs/Local Authorities (LAs) are encouraged to have a child exploitation action plan. The action plan should capture learning and development opportunities across LA areas. Seek to increase positive outcomes for children through the increase of referrals and disruptions of perpetrators. The action plan should focus on the sharing of good practice and organizational learning, this will be shared and reflected on the regional chairs meeting.

#### Recommended MACE attendees

Attendees must be in a position of managerial responsibility or have strategic oversight of their area of business.

- Police – Local Borough Detective Chief Inspector or Detective Inspector (co-Chair).
- LA senior manager (co-Chair).
- Police – Local borough child exploitation SPOC.
- Police – Children's Social Care (CSC) SPOC (when requested by chair).

- LA child exploitation co-coordinator.
- Health – Identified child exploitation lead(s).
- Education – Identified child exploitation lead(s).
- Mental health lead.
- LA analyst.

### Other key partners as identified such as

- Youth offending service or probation service manager.
- Rescue and response.
- Child sexual exploitation partnership teams (county line experts).
- Child exploitation charity/Commissioned service, e.g. National Society for the Prevention of Cruelty to Children/ Barnardo's/Children's Society/Safer London.
- Police – CSC gangs partnership/BCU Safeguarding Hub representatives/schools officer/supervisor/TfL/BTP.
- Drugs/Alcohol teams.
- Key business leads.
- Borough media communications team representative.
- LA specialist services e.g. Housing/ Licensing etc.
- Other (as identified).

### Multi-Agency Child

### Exploitation pre-meeting (Pre-MACE)

A Pre – MACE that is well supported can ensure the MACE runs effectively. The meeting is not designed to replace current London Child Protection Procedures and is not a strategy meeting. The sharing of information should not be delayed in order to wait for the next meeting. Agencies should share relevant concerns as soon as they come to light. This will ensure a lead agency or authority is agreed and clear direction is provided for coordinated activity.

The Pre-MACE should act as a quality assurance process to ensure the high-risk cases are escalated to MACE. It is recommended that this meeting takes place at first line manager level who have an operational role.

### Pre-MACE Attendees

- LA co-Chair.
- LA child exploitation lead.
- Analyst/Coordinator.
- BCU child exploitation SPOC.

## Appendix E Police flags and outcome codes

### Recording all suspicions of Child Exploitation.

Relevant flags on Crime Report Information System (CRIS), Crimint and Merlin must be used to identify all referrals or intelligence for child exploitation. The rationale for believing any suspicion of child exploitation must be entered on the DETS page within the CRIS report. It is recommended the rationale will include any of the child exploitation warning signs identified. Assigning the correct flags and maintaining this compliance is vital to ensure data accuracy and allow the completion of effective analysis to understand the scale of pan-London child exploitation.

#### The MPS 'Branch Flags' for child exploitation are:

- CO** – Must be entered onto the CRIS report to identify any investigation which involves a suspicion of child criminal exploitation.
- CL** – Service/Force flag must be entered onto the CRIS report to identify any investigation which involves an element of county lines.
- ES** – Must be entered onto the CRIS report to identify any investigation which involves a suspicion of child sexual exploitation.
- ER** – Must be entered onto the CRIS report to identify any investigation which involves a suspicion of child sexual abuse.
- EU** – Must be entered to identify children who are suffering/involved in sexual exploitation 'online', e.g. by the use of any computer or other electronic devices such as a smartphone containing social media apps like Instagram, Snapchat, WhatsApp, Facebook, HouseParty, etc.

**GE** – Must be entered to identify criminal investigations where the offence appears to be the responsibility of an 'exploitive group', e.g. the Rochdale scenario in a child sexual exploitation case, or an Organised Crime Group exploiting a child for their labour.

**GA** – Gangs related.

**MH** – Victim of modern slavery flag.

**NM** – When an National Referral Mechanism referral is completed (the reference tab on the CRIS report must be updated).

A non-Crime code of 588/00 has been introduced to create a CRIS report where concerns are raised about a child or children who may be subject to exploitation, even where no actual allegation of crime is made and no offence has been alleged. This code will be used to record enquiries/investigations and also to record multi-agency activity/partnership working and outcomes in such circumstances. The relevant flags must also be entered onto the CRIS report. However, these reports relate to individual victims and not the number of times they have come to notice. This will reduce the time spent by officers completing repeat non-Crime 588/00 reports and will ensure they remain victim-focused and not incident-focused.

### Outcome codes to be entered at the conclusion of the investigation

**MI** – Must be entered onto the victim’s Code of Practice page of the CRIS report when a positive intervention for the victim is achieved.

**FP** – Must be entered on the suspect’s page of the CRIS report whenever an order is served on the suspect.

This includes Section 2 Abduction Warning Notice Orders, Sexual Risk Orders, Notification

**FO** – Must be entered onto the suspect’s page in the same manner when a Sexual Harm Prevention Order (SHPO) is served. This is because SHPOs already have a recording mechanism on the CRIS system.

**FQ** – Must be entered onto the suspect’s page of the CRIS report when a positive disruption to the suspect(s) has been achieved. This will include positive disruptions where a suspect has been charged as a consequence of an exploitation investigation. This is regardless of whether the charge is related to a sexual exploitation offence or not, for example a suspect charged with drug offences.

**FY** – Must be entered onto the Suspect Elimination page of the CRIS report if a Child Abduction Warning Notice has been served.

**FP, FO, FY** and **FQ** flags are generated by going to the Suspect Elimination screen – Onto circulation – click on circulations title then ‘look up’ – select finger and palm print results + SHPO then scroll down. **FP, FO, FY** and **FQ** flags can be found there.

## Appendix F 87A referral form



Form 87A

### Referral to Police

Police Admin only			
Received date:	Time:	CPU/URN:	
Receiver:			
Sexual <input type="checkbox"/>	Physical <input type="checkbox"/>	Neglect <input type="checkbox"/>	Other <input type="checkbox"/>
(A) Referrer			
Name:			
Agency address:			
Telephone no.:			
Email address:			
Team Manager			
Name:			
Telephone no.:			
Email address:			
(B) Concerns/Expected outcome:			
What is/are the main concerns in relation to this referral?			
<input type="checkbox"/> Domestic Abuse	<input type="checkbox"/> Child Abuse/Neglect	<input type="checkbox"/> FGM	<input type="checkbox"/> Other e.g. Exploitation, LADO Issue
What do you expect from this referral? I.e. S47 strategy discussion/ICPC referral			
(C) Details of Child/Young Person/Adolescent (18-25 years)			
Family name:		Forenames:	
Date of birth:		Gender:	
Ethnicity:		Religion:	
First language:		Interpreter required?	
Home address:	Full address with postcode		
Telephone no.:		Child's mobile no.:	
School/Nursery address:	Full address with postcode		
Is/are the child(ren)/adolescent(s) known to another Borough?	Yes / No	Borough name(s)	
Open to YOS (Y/N)		Agency involvement (e.g. Open case, CIN/CP EIS)	
Current location of the child(ren)/adolescent(s)			

<b>Current location:</b>	If different from home address
--------------------------	--------------------------------

(D) GP details of the child/adolescent:			
<b>GP's name:</b>			
<b>GP's address:</b>			
<b>GP's contact number:</b>		<b>GP's Email:</b>	

(E) Family members/Other significant persons inside/outside the household					
Family name	Forenames	DoB	M/F	Ethnicity	Relationship to child
Address: If different from home address					
Address: If different from above					
Address: If different from above					
Address: If different from above					
Address: If different from above					

If further family members/details are required, please use Section M below.

(F) Nursery/School/Collage details of all family members under 18 years	
Name	School address
	If different from above
	If different from above
	If different from above

(G) Suspect(s)					
Family name	Forenames	DoB	M/F	Ethnicity	Relationship to child
Address:					
Family name	Forenames	DoB	M/F	Ethnicity	Relationship to child
Address:					

(H) Existing risk factors				
Victim	Yes	No	U/K	Source/Reference
Repeat victim (min: 2 times in rolling 12 months)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Repeat MISPER (min: 2 times in rolling 12 months)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Subject of Child Protection Plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sexualised behaviour by victim	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Victim's injury caused by weapon/implement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Young age/Pre-mobile baby	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Substance misuse/alcohol abuse	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Privately fostered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Home educated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Mental health issues	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Trafficking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Suspect	Yes	No	U/K	Source/Reference
Evidence of grooming/control	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Suspected of/history of previous abuse	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Suspected of/history of domestic violence	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Tendency towards violence	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Substance/alcohol misuse	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Mental health issues	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Household	Yes	No	U/K	Source/Reference
Mental health issues (suspect/family)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Chaotic/co-sleeping arrangements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Emotional stressors within the household (financial, illness, high conflict)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Divided family structure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Person with new or revived access to the child	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Deprivation or poverty in home/local area	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(I) Family members with known disabilities/mental health issues/learning issues	
Name	Details
	I.e. Deaf/ADHD

(J) Additional risk factors
Is there any evidence or reason to believe the carer is deceitful or manipulative?

(K) Reason for referral
Summarise risk factors and current risk assessment

(L) Details of strategy discussion
Decisions:

(M) Additional Information
Decisions:
For information unable to be added - i.e. additional family members.

**If you have a criminal and/or sexual exploitation concern complete the details below.**

Referral supervisor's comments/rationale (summarise risk factors and current risk assessment)
<u>Sexual identity, wellbeing and choice</u>
<u>Absence, truancy and going missing</u>
<u>Family and home</u>
<u>Emotional and physical health</u>
<u>Gangs, groups, age gaps and crime</u>
<u>Use of technology and sexual bullying</u>
<u>Alcohol and substances</u>
<u>Receipt of unexplained gifts or money</u>
<u>Distrust of authority figures</u>
<u>VOLT Analysis</u>

Police Only		Assessment score
Emerging Risk	Some evidence that the child or young person is at risk of exploitation and/or places him/herself at risk. Some concerns that the child/young person is at risk of being targeted or groomed, but there are positive protective factors in the child's life. The child/young person may require a referral to targeted early intervention services for education/intervention.	
Moderate Risk	Child is vulnerable to being exploited but there are not immediate/ urgent safeguarding concerns. There is evidence the child/young person may experience protective factors but circumstances and/or behaviours place him/her at risk of exploitation.	
Significant Risk	Evidence/Disclosure suggests that the child is at immediate and/or continuing risk of criminal exploitation. The child/young person is engaged in high risk situations/relationships/risk taking behaviour. Evidence/Assessments, suggests that the child is experiencing exploitation (they may not recognise this).	

Referral accepted?	Yes <input type="checkbox"/> No <input type="checkbox"/>	CRIS ref. if applicable	
If 'N' state rationale			
Supervisor (Sergeant) signature			
Signed:	Print name:	Date:	
<b>Child Exploitation Guidance</b>			

Existing risk factors (not exhaustive)	
<b>1. Sexual identity, wellbeing and choice</b>	
<ul style="list-style-type: none"> <li>Sexually transmitted infections/pregnancy/terminations.</li> <li>Changes or out of character sexualised behaviour in an unsafe context or environment.</li> <li>Visible physical markings which would suggest sexual interaction i.e. love bites.</li> <li>Displaying sexualised behaviour.</li> <li>Victim/Witness of a sexual crime.</li> <li>Increasing use of sexualised language.</li> <li>Talks about or witness to recent incidents of violence.</li> <li>Admits to carrying or will carry a weapon for self-protection.</li> </ul> <p><i>Please make clear signs/indicators/evidence of targeting and/or grooming of the child by another.</i></p>	
<b>2. Absence, truancy and going missing</b>	
<ul style="list-style-type: none"> <li>Truancy/unexplained absences from school/permanently excluded.</li> <li>Staying out overnight/absences from the family home/placement.</li> <li>Extended periods of being missing from home/placement.</li> <li>Change in routine or the above behaviours out of character for the child.</li> <li>Taken to parties, houses, unknown areas, hotels, nightclubs, takeaways or out of area by unknown adults.</li> <li>Returns from missing episodes with injuries or dishevelled /unkempt physical appearance.</li> </ul>	<ul style="list-style-type: none"> <li>Returning home with new unexplained clothing or belongings.</li> <li>Talking about travelling to different areas of cities.</li> <li>Persistently found in different areas of London.</li> <li>Found outside London area – use of train links, etc. (links to county lines).</li> <li>Found in possession of paid train tickets – Uber cars/coach tickets and consider mode of transport/payment.</li> <li>Abducted and forced imprisonment (described by young person as 'locked in').</li> </ul>
<p><i>Please make clear signs/indicators/evidence of targeting and/or grooming of the child by another.</i></p>	
<b>3. Family and home</b>	
<ul style="list-style-type: none"> <li>Neglect – consider emotional/physical /sexual – lack of parental supervision.</li> <li>Lack of positive relationships/understanding or trust within the household.</li> <li>Evidence of decline in relationship and/or communication with family/parent/carer – out of character/changes in behaviour.</li> </ul>	<ul style="list-style-type: none"> <li>Reduced contact with family/friends – out of character behaviour changes.</li> <li>Known older siblings/family members involved in drug distribution/county lines/gangs/CSE – indicators/signs of the child is being groomed or targeted.</li> <li>Family linked to serious and organised crime.</li> <li>Family members victim of serious violence.</li> <li>Parental absence.</li> <li>Parental substance dependency.</li> </ul>
<p><i>Please make clear signs/indicators/evidence of targeting and/or grooming of the child by another.</i></p>	
<b>4. Emotional and physical health</b>	
<ul style="list-style-type: none"> <li>Concerns of self-harm and/or eating disorders (especially new or increased).</li> <li>Difficulty in making or maintaining friendships with peers.</li> <li>Increasing language in relation to drug dealing and/or violence.</li> <li>Signs of withdrawal/distancing/low communication and secrecy i.e. experiences of trauma or PTSD.</li> <li>Expressions around invincibility or not caring about what happens to them.</li> </ul>	<ul style="list-style-type: none"> <li>Changes in physical appearance or attire.</li> <li>Increased concerns of self-harm, violent/emotional outbursts or bullying/threatening behaviour.</li> <li>Increasingly disruptive, hostile or physically aggressive at home/placement or school.</li> <li>Unexplained physical injuries suggestive of physical assault.</li> <li>Marks/injuries not consistent with the explanation of the child.</li> <li>Attendance at A&amp;E with significant injuries (especially if caused by a knife/weapon).</li> </ul>
<p><i>Please make clear signs/indicators/evidence of targeting and/or grooming of the child by another.</i></p>	
<b>5. Gangs, groups, age gaps and crime</b>	

<ul style="list-style-type: none"> <li>Associating with known drug dealers/connections to county lines – indicators/signs of being targeted or groomed.</li> <li>Forced to sell drugs to pay off debts e.g. drug debt (debt bondage).</li> <li>Threats to life or threats of harm made to child/family.</li> <li>Child forming new/unknown friendship or associations with older males/females.</li> </ul>	<ul style="list-style-type: none"> <li>Arrested/Come to Police attention in the following circumstances:               <ol style="list-style-type: none"> <li>outside of London,</li> <li>arrested for drug related offences/robbery/offensive weapons/money laundering,</li> <li>within a cuckooed address,</li> <li>and there are indicators/signs of being targeted or groomed.</li> </ol> </li> <li>Criminal gains not evident when clearly engaged in criminal activity.</li> </ul>
<p><i>Please make clear signs/indicators/evidence of targeting and/or grooming of the child by another.</i></p>	
<b>6. Use of technology and sexual bullying</b>	
<ul style="list-style-type: none"> <li>Receives an excessive number of text messages or phone calls i.e. being tasked to engage in criminality.</li> <li>Chatroom attendance/Online dating.</li> <li>Forming new associations online with older men/women.</li> </ul>	<ul style="list-style-type: none"> <li>Signs of cyber bullying and online grooming/sexting /chatrooms/apps consider perpetrators.</li> <li>In possession of multiple handsets, sim cards/sim card packaging, 'burner' type handsets.</li> <li>Possession of hotel keys/cards or keys to unknown locations.</li> </ul>
<p><i>Please make clear signs/indicators/evidence of targeting and/or grooming of the child by another.</i></p>	
<b>7. Alcohol and substances</b>	
<ul style="list-style-type: none"> <li>Frequenting/associating in areas for selling drugs – indicators/signs of being targeted or groomed.</li> <li>Child has engaged or increased in either alcohol/drug use which is out of character.</li> <li>Found in possession/supply of drugs (especially heroin/crack cocaine).</li> <li>Found/Frequenting in areas/properties known for drug activity i.e. crack house/cuckooing/flophouse.</li> </ul>	
<p><i>Please make clear signs/indicators/evidence of targeting and/or grooming of the child by another.</i></p>	
<b>8. Receipt of unexplained gifts or money</b>	
<ul style="list-style-type: none"> <li>New or expensive possessions which cannot be accounted for.</li> <li>Unexplained money/mobile phones/phone credit/travelling in taxis/pre-paid rail and/or coach tickets.</li> <li>Undertakes 'work' in return for material items or money.</li> </ul>	
<p><i>Please make clear signs/indicators/evidence of targeting and/or grooming of the child by another.</i></p>	
<b>9. Distrust of authority figures</b>	
<ul style="list-style-type: none"> <li>Resistance to communicating with parents, carers, teachers, social carers, health workers, police officers and others.</li> </ul>	
<p><i>Please make clear signs/indicators/evidence of targeting and/or grooming of the child by another.</i></p>	
<b>Remember to apply VOLT to all exploitation referrals</b>	
<ul style="list-style-type: none"> <li>V – Victim(s)</li> <li>O – Offender(s)/Perpetrators/Persons of concern</li> <li>L – Location(s)</li> <li>T – Theme(s)</li> </ul> <p>To assist with the identification of themes and/or emerging trends at MACE (Multi Agency Exploitation Panel).</p>	

Retention Period: 7 Years  
MP 67/14

# Appendix G

## BCU to Specialist Crime escalation guidance



**METROPOLITAN  
POLICE**

MODERN SLAVERY & CHILD EXPLOITATION



### ESCALATION REFERRAL FORM – BCU TO MSCE UNIT

Government Security Classification (GSC)	<b>OFFICIAL SENSITIVE</b>
FOIA Exemption	No
This report is the property of the Metropolitan Police Service and is intended for the recipient only. It must not be copied or disseminated further without prior authority of:	
<b>Central Specialist Crime – Vulnerability and Partnership Team – Initial Assessment Team</b> <b>SC Mailbox – Vulnerability – VAPT Referrals</b>	

### Specialist Crime – Modern Slavery Child Exploitation (MSCE) escalation

This form documents the escalation process/actions that must be completed prior to submission. This form is to be completed by the investigating officer and supervised by the line manager. The supervisor must send the referral form to the **SC Mailbox – Vulnerability – VAPT Referrals** for review at the daily GRIP meeting to ensure it reaches the Specialist Crime threshold.

#### National Definition – Organised Crime Groups (OCGs)

Individuals, normally working with others, with the capacity and capability to commit serious crime on a continuing basis.

#### National Definition – Serious Crime

Crime that involves the use of violence, results in financial gain or is conducted by a number of persons in pursuit of a common purpose, or crime for a person on first conviction could reasonably expect to be imprisoned for three years or more.

#### Modern Slavery Child Exploitation Specialist Crime Remit

##### **Investigations**

MSCE will target/disrupt known perpetrators linked to non-crime child exploitation investigations where one or more children is being exploited sexually or criminally by a known OCG. There must be significant intelligence or an evidential case to support the exploitation element. All cases must be referred to Children’s Social Care (CSC) by BCU officers via the escalation process. BCUs will maintain safeguarding responsibility of the concerned child/children. If the investigation does not pass the CSC threshold, written advice and actions will be provided.

MSCE will undertake complex modern slavery investigations where multiple adult and/or child victims are being exploited by an OCG or multiple suspects. Exploitation of the victim must be the major issue. There must be significant intelligence or an evidential case to support the modern slavery element. All cases must be referred to Vulnerability Assessment and Partnership Team (VAPT) by BCU officers via the escalation process. If the investigation does not pass the Specialist Crime threshold, written advice and actions will be provided

##### **High Harm Offenders**

MSCE will disrupt high-risk offenders linked to multiple children.

MSCE will disrupt Op Bassona subjects.

MSCE will obtain police civil orders relevant to MSCE ongoing investigations.

MSCE will maintain strategic oversight for all Sexual Risk Orders.



MODERN SLAVERY & CHILD EXPLOITATION



MODERN SLAVERY & CHILD EXPLOITATION



Investigation teams will target and disrupt high-harm MSCE offenders referred via BCUs. Recency/Frequency/Gravity scoring matrix will be applied by the VAPT.

The following points on this escalation form are to be completed.

Details

CE or MS	BCU and Borough	CRIS Number/CRIMINT/Op Name	Escalation – IO/Supervisor
Victim(s) name/age			
Suspect(s)			

Circumstances of concerns:

**Actions completed to date (these must be placed on the actions page of CRIS with the results documented). The minimum requirements are documented below.**

- A1:** Victim visit and account secured/intelligence debrief. If appropriate, conduct ABE interview and submit NRM referral. **(Add details)**
- A2:** Current safeguarding plan for child/children. **(Add details)**
- A3:** Investigation strategy/lines of enquiry completed to date – see best practice MSCE investigation templates on the intranet page.  
<http://mpswb.intranet.mps/policing/safeguarding/>

**A4:** Consulted with the Organised Crime Advisor/BCU MSCE SPOC prior to submitting the escalation form.

What is the supporting MSCE evidence/intelligence case that qualifies this investigation to reach the Specialist Crime remit threshold. This is to be completed by a supervisor and be placed on the review page of CRIS and should specify the evidence that has been identified that warrants the escalation. If only Central Specialist Crime investigation support or advice is required a full written advice sheet will be completed. Contact your BCU MSCE SPOC or the VAPT IAT for further guidance.

- 1) **Result:** Reviewing officer will update the IO/supervisor directly via email and on the CRIS report with the decision and rationale and inform the VAPT – IAT for the daily Grip meeting

## Appendix H

# Tactical options and legislation

It is vital that relevant information about the child held by professionals is shared so that safeguarding plans can be devised and intelligence gaps identified and filled.

Strategy meetings chaired by Children's Social Care, are an essential part of Child Protection Procedures and can lead to early help for the young person such as 'Team Around the Family', Child in Need Plans and sometimes Child Protection Plans. Where there are concerns regarding child exploitation the following multi-agency actions should be applied to the victims:

- Police National Computer (PNC) marker indicating the young person is at risk of child exploitation.
- National Referral Mechanism (NRM) referral (if the child is at risk of modern slavery). The NRM is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support. Modern slavery is a complex crime and may involve multiple forms of exploitation. It encompasses human trafficking, slavery, servitude and forced or compulsory labour.
- All the people and professional agencies relevant to the child must be made aware of the risk that they are facing.
- Strategy meeting. Ensure all known relevant information is shared to enable the development of an effective Safeguarding Plan and identification of intelligence gaps that could be filled.
- Referral to voluntary sector support agencies.

- Haven attendance in forensic sexual offence cases. Young people under the age of 16 can self-refer to Haven but their attendance may not be anonymous as an after-risk assessment referral to CSC may take place.
- Early Evidence Kit. Retrieval of potential forensic evidence by first responders to a victim of serious sexual assault.
- Clothing. For sexual exploitation cases consider seizing as evidence, especially underwear, even when no disclosure of sexual abuse has been made but concerns exist. May have to be done covertly without the child's knowledge.
- Mobile phones and social media. Seizure by lawful means, e.g. as evidence of crime, warrant, voluntarily provided, confiscation by school (see Government advice re: 'sexting'). Ascertain unlock codes, social media apps used, regular numbers dialled, etc.
- Oyster card checks to investigate movement and locations attended by either victims or suspects. Police officers must request Oyster card data or TfL closed-circuit television (CCTV) downloads.

**For further guidance please review investigation/supervision /closing templates found on the MPS Public Protection intranet page.**

### Safeguarding Orders

#### Care Order – Section 31 Children Act 1989.

The Local Authority (LA) or an authorised person may apply to place a child into the care of a designated LA, enabling them to share parental responsibility (PR). Application must be made prior to the child reaching age 17 and will only be made by a court if it is satisfied the child concerned is suffering, or is likely to suffer significant harm, or the child is beyond parental control.

#### Secure Accommodation Order – Section 25 Children Act 1989.

If the LA deem a looked after child (Care Order or accommodated with the consent of those adults with PR) to be at such significant risk of harm, then it can accommodate a child in secure accommodation for a period of no more than 72 hours without an order of the court. An order will only be granted where the child has a history of absconding and is likely to abscond from accommodation which is not secure. They are likely to suffer significant harm or are likely to injure themselves or another. This order leads to restriction of liberty and should only be considered where there are no alternatives. Less restrictive options should have been considered.

#### Section 20 Children Act 1989.

Every LA shall provide accommodation for any child in need within their area, who appears to them to require accommodation as a result of there being no person who has PR or they appear lost or abandoned, or the person who has been caring for them is being prevented (for whatever reason) from providing suitable accommodation or care. The LA may provide accommodation if they consider that to do so would safeguard or promote the child's welfare.

The LA may not accommodate if the person with PR and who can provide suitable accommodation objects. They may also remove a child from accommodation at any time.

#### Emergency Protection Order – Section 44 Children Act 1989.

Application is made by the LA or authorised person. Immediate removal of a child from the care of their parent or carer if they are at imminent risk of harm for up to eight days. An Emergency Protection Order (EPO) may also be made where Section 47 enquiries are ongoing and being frustrated by refusal to allow access to the child.

#### Police Protection – Section 46 Children Act 1989.

If a police constable has reasonable cause to believe that a child would otherwise be likely to suffer significant harm they may be removed to suitable accommodation and kept there, or they may take such steps that are reasonable to ensure a child's removal from any hospital or other such place in which they are being accommodated is prevented.

#### Inherent Jurisdiction – Section 100 Children Act 1989.

To be considered by the LA when there are no other orders available under the Children Act 1989 to safeguard. Where perpetrators are known and it can be evidenced that the child has been sexually exploited, injunctions can be sought. It can seek to impose restrictions on named individuals to prevent them having direct or indirect contact with the child, excluding them from the area in which the child lives and from using social media. The evidential basis is high and requires comprehensive information sharing between all partner agencies.

**Return Home Interviews** of missing children to be conducted and intelligence to be recorded on Crimint or the Merlin Pre-Assessment Checklist, so it is searchable by all MPS personnel investigating child protection. Partner agencies should also refer any intelligence obtained in these interviews to the police.

**Trigger plans for missing children** at risk of child exploitation. To include consideration of seizing underwear, phones and other clothing. Some regular high-risk missing young people may be the subject of a missing passport on which there is space to consider a child exploitation specific trigger plan but if not, the trigger plan should be placed on to Crimint and clearly titled 'Child Exploitation Missing Trigger Plan'.

### Disruption tools for offenders

#### PNC markers

For suspected perpetrator indicating they pose a risk.

#### PNC vehicle markers

For vehicles linked to suspected perpetrators. Consider automatic number plate recognition to provide information of vehicle movements.

#### The Police National Database

A national information-sharing system that allows forces direct access to up-to-date information on crime, custody, intelligence, domestic abuse and child abuse held by other forces.

#### Section 51 Serious Crime Act 2015.

These prevent the respondent from engaging in, encouraging or assisting, gang-related violence or gang-related drug dealing activity.

#### Anti-Social Behaviour (ASB) – Section 1 ASB, Crime and Policing Act 2014.

Civil injunction to stop individuals engaging in ASB. Can be applied for by the LA, police or housing providers.

#### Criminal Behaviour Order – Section 22 ASB, Crime and Policing Act 2014.

Requested through the prosecution upon conviction of an offender. Prohibits offender from doing anything described.

#### MPS Letter of Concern.

The letter is designed to reinforce the steps that we take to protect a potential victim of child exploitation and disrupt the suspect/ person of interest where legislation fails to provide. It's intended to be served by hand to an individual who cannot be served an Abduction Notice and it can only be served once the person has been spoken to by the investigating officer. The reason for crafting such a document was borne out of a number of recent investigations where we firstly lacked evidence and secondly lacked such a letter to reinforce our warning.

#### Child Abduction Warning Notice (CAWN) – Section 2 Child Abduction Act 1984.

Authorised by an Inspector and to be considered when a child (under 16) being in the company of the suspect causes significant cause for concern or they are a missing child having been found with the suspect on two or more occasions. Section 49 of Children Act 1989 enables a CAWN to be served as above but for children under 18 who are subject to a full care order.

#### The issuing of a CAWN is a valuable safeguarding measure to:

- reduce repeat incidences of such children being missing from the care of those responsible for their welfare,
- reduce risk that such children are being exposed to,
- set out a clear, graduated and proportionate response to such cases,
- set out a clear procedure for the issue and audit of CAWNs so that they are evidentially viable and sound in terms of potential prosecution, and
- adopt a problem-solving approach to reducing instances of missing from home.

CAWNs must be pre-authorized by an inspector or above. A dedicated entry must be placed on the crime report recording rationale for serving the CAWN. A further inspector review is required after service.

#### The following keys actions must be completed on service of a CAWN:

- PNC records to be created for the victim and perpetrator and this must be reviewed six months after creation governance and relevancy.
- LA informed.
- Parental letter to be supplied.
- A clear strategy documented on the non-crime exploitation report to police the CAWN and what actions to undertake if a perpetrator is arrested.

#### Abduction of Children in Care – Section 49 Children Act 1989.

Where a CAWN is breached, police may give consideration to proceeding with criminal charges for the abduction of a child in care (care order, EPO or Police Protection Order (PPO)).

#### Abduction of a child by other persons – Section 2 Child Abduction Act 1984.

Where a CAWN is breached, consideration may be given to proceeding with criminal charges for the abduction of a child under 16 by other persons.

#### Recovery Order – Section 50 Children Act 1989.

Application can be made by the LA if the child is subject to a care order or EPO, and by police if a PPO. The court can direct a person to produce the child to a specified person.

#### Failing to provide PIN code

Consult with the evidential lab to ascertain whether a phone can be accessed without PIN codes. If it cannot, contact the National Technical Assistance Centre (NTAC) for advice on 0207 901 4541 (Apple), 0207 901 45498 (hardware, embedded and mobile devices). If the NTAC cannot access the phone then consider the serving of a notice under S49 Regulation of Investigatory Powers Act (2000) (RIPA). NTAC are appointed gatekeepers to this process under the Codes of Practice and S71 of RIPA 2000. A superintendent's authority is required. An application should be made to a Crown Court judge to authorise the issue of a S49 notice. The authorised S49 notice should be served to the subject in person and evidenced by way of a statement. If they refuse to provide the information within the timeframe, the offence under S53 is complete and Crown Prosecution Service charging advice can be sought.

### **Sexual Risk Order (SRO) – Section 113 ASB, Crime and Policing Act 2014.**

Where a person has carried out an act deemed to be of a sexual nature and who as a result, is believed to pose a risk of harm to children.

#### **The SRO application may be made in relation to a person without a conviction for a sexual or violent offence (or any offence), but who poses a risk of sexual harm.**

The SRO may be made by the magistrates' court on application by the police or National Crime Agency (NCA), where an individual has done an act of a sexual nature, as a result, poses a risk of harm to the public in the UK or adults or vulnerable children overseas.

The term intentionally covers a broad range of behaviour. Such behaviour may, in other circumstances and contexts, have innocent intentions. It also covers acts that may not in themselves be sexual, but which have a sexual motive and/or are intended to allow the perpetrator to move on to sexual abuse.

As an indication, it is expected that examples of such behaviour might include the following (note that this list is not exhaustive or prescriptive, and will depend on the circumstances of the individual case):

Those specified acts that were set out for the purposes of the previous Risk of Sexual Harm Order (some of which may be criminal in their own right), which included:

- engaging in sexual activity involving a child or in the presence of a child,
- causing or inciting a child to watch a person engaging in sexual activity or to look at a moving or still image that is sexual,
- giving a child anything that relates to sexual

activity or contains a reference to such activity, and

- communicating with a child, where any part of the communication is sexual.

#### **Acts which may be suggestive of grooming:**

Contacting a child via social media and spending time with children alone. Acts which may be suggestive of exploitation, such as:

- inviting young people to social gatherings that involve predominantly older men or women,
- providing presents, drink and drugs to young people, or
- persuading young people to do things that they are not comfortable with and which they had not expected.

Acts which may be carried out in a gang or group of individuals of similar ages, 'peer-on-peer'.

An SRO may prohibit the person from doing anything described in it – this includes preventing travel overseas. Any prohibition must be necessary for protecting the public in the UK from sexual harm and in relation to foreign travel, protecting children or vulnerable adults from sexual harm.

An individual subject to an SRO is required to notify the police of their name and home address within three days of the order being made, they should also notify any changes to this information within three days.

An SRO lasts a minimum of two years and has no maximum duration, with the

exception of any foreign travel restrictions which, if applicable, last for a maximum of five years (but may be renewed).

As with the Sexual Harm Prevention Order (SHPO), breach of an order is a criminal

offence punishable by a maximum of five years' imprisonment. The criminal standard of proof continues to apply, the person concerned is able to appeal against the making of the order and the police or the person concerned are able to apply for the order to be varied, renewed or discharged.

A breach of SRO will make the person subject to full notification requirements.

### **Sexual Harm Prevention Order – Section 113 ASB, Crime and Policing Act 2014.**

Applied for where an individual already has a schedule 3 or 5 offence under the Sexual Offences Act 2003.

The SHPO replaces the sexual offences prevention order and foreign travel order, it may be made in relation to a person who has been convicted of, or cautioned for, a sexual or violent offence (including equivalent offences committed overseas) who poses a risk of sexual harm to the public.

The SHPO may be made by a court on conviction for a sexual or violent offence, or by the magistrates' court on application by the police or NCA. A court may impose an order for the purposes of protecting the public in the UK and/or children or vulnerable adults abroad from sexual harm.

An order may prohibit the person from doing anything described in it – this includes preventing travel overseas. Any prohibition must be necessary for protecting the public in the UK from sexual harm or, in relation to foreign travel, protecting children or vulnerable adults from sexual harm.

An SHPO will make the person subject to the notification requirements for registered sex offenders for the duration of the order (that is, it puts them on the 'sex offenders' register), if they are not already.

An SHPO lasts a minimum of five years and has no maximum duration, with the

exception of any foreign travel restrictions which, if applicable, must be renewed after five years.

In line with the existing position, breach of an order is a criminal offence punishable by a maximum of five years' imprisonment, the criminal standard of proof continues to apply, the person concerned is able to appeal against the making of the order and the police, or the person concerned are able to apply for the order to be varied, renewed or discharged.

### **Human Trafficking – Part 1 Section 2 Modern Slavery Act 2015.**

A person commits an offence if they arrange or facilitate the travel of another person with a view to that person being exploited. It is irrelevant whether the victim consents to the travel.

### **Slavery and Trafficking Prevention Orders – Section 14 – Section 15 Modern Slavery Act 2015.**

Can be obtained by the police, the NCA and immigration officers. Prevents and prohibits convicted defendants from activities which enabled them to commit trafficking and slavery offences. A Slavery Trafficking Risk Order (STRO) can be made by a Court in respect of an individual who has not been convicted of a slavery or trafficking offence. The Court must be satisfied that there is a risk that the defendant may commit a slavery or human trafficking offence and that the STRO is necessary to protect against the risk of harm from the defendant committing the offence. STROs enable action to be taken where this is necessary to prevent serious harm to the public notwithstanding the absence of a conviction.

The STRO is sought through a free-standing application by the police, the NCA, an immigration officer or a LAPO to a Magistrates' Court.

An STRO may impose any restriction the court deems necessary for the purpose of protecting the public from harm. The STRO may also include a requirement that the defendant provide his name and address, including updating this where the information changes, the detail of who the defendant should contact and how it should be set out in the Order.

**Forfeiture and detention of vehicles used in trafficking** – Modern Slavery Act.

**Controlling or coercive behaviour** – Serious Crime Act 2015.

**Restraining Orders and Non-Molestation Orders** – Section 42 Family Law Act 1996, Section 12 Domestic Violence, Crime and Victims Act 2004.

**Digital Devices** – Seizure of the perpetrator's phones, computers, tablets and other storage devices, etc. This can be done at the time of arrest under Section 32 Police and Criminal Evidence Act (1984) (PACE) or Section 18 PACE with an inspector's authority if elsewhere.

### Locations of child exploitation

General awareness of child exploitation amongst key groups of professionals and community organisations is a critical protective factor for children and families. Mapping of potential access points to vulnerable children and young people will assist in targeting those areas where perpetrators prey on children. Police should lead on this, but information and intelligence from all agencies will be used to map the 'hotspots'. These areas may include hostels, care homes, youth clubs, schools, taxi ranks and local food outlets, etc.

### Hospitals, General Practitioner surgeries, termination centres, pharmacies, etc.

Staff at these locations need to be aware of child exploitation, as victims of child exploitation will attend looking for health advice, such as the morning after pill or treatment for sexually transmitted infections or pregnancy, quite often they are accompanied by perpetrators.

### Children's homes

Ensure child exploitation awareness of all staff working in care homes. Brief staff regarding identities of possible perpetrators and vehicles. Ensure missing episodes are reported correctly and link in with missing person coordinator for repeat missing problem-solving ideas. Implement trigger plans when a child goes missing to ensure full debriefs and consider forensic retrieval of underwear and phones.

### Parks, city centres, takeaways and taxi firms

These are areas children are likely to meet or where first contact between victim and perpetrator may take place and/or sexual offending will occur. Community safety partnerships should be key in developing plans to disrupt child exploitation activity. Operation Makesafe awareness raising activity, CCTV, lighting improvements, patrols by police, local wardens and covert observations should be considered. Licensing, Trading Standards, Department for Work and Pensions (DWP) and UK Border Agency enquiries may assist disruption of these locations due to illegal trading and illegal employees. Consider Closure Orders.

### Private premises

Housing can be a source of useful information regarding LA social housing. Housing associations and private landlords can, on occasion, gain access to premises and have a maintenance workforce who regularly access housing for repair work

that may provide intelligence-gathering opportunities. London Fire Brigade may also be able to gain access to enhance intelligence picture. Police powers of entry should be considered such as Section 17 PACE where there are reasonable grounds to believe a person they seek is within the dwelling.

When police are investigating offences, they can apply for a warrant to enter and search such as a Section 8 PACE warrant to look for evidence of an offence under investigation, Protection of Children Act 1978 to allow entry to search for indecent images, Section 50 Children Act to enter and search to recover a child subject of a care order and Misuse of Drugs Act when the child exploitation evidence is insufficient but there is evidence of drugs.

### Hotels

A regular meeting place for young people and often used for drug, alcohol and sex parties. Operation Makesafe awareness raising should be considered on a regular basis with hotels in the area, as well as regular briefings with staff re: victims, perpetrators and vehicles used. Consider CCTV and booking details, including payment methods, to identify perpetrators. Forensic examination of rooms may be a suitable option.

### Hotels in relation to child exploitation – Section 116 –118 ASB, Crime and Policing Act 2014.

A senior police officer can issue a written notice to the owner, operator or manager of a hotel or similar establishment which they reasonably believe has been or will be used for child exploitation or related activities. The hotel is required, on request, to provide information to the police such as guest's names and addresses and other information which could be readily obtained from guests themselves.

### Section 43 ASB, Crime and Policing

### Act 2014

Can be issued by the LA, police or an agreed designated person such as a social housing landlord. The aim of a Community Protection Notice is to prevent persistently anti-social conduct by individuals or businesses which is having a detrimental effect, of a continuing nature, on the community's quality of life.

### Dispersal Powers

Section 35 ASB, Crime and Policing Act 2014. A senior police officer is able to authorise the use of dispersal powers in a specified area for up to 48 hours, in order to reduce the likelihood of members of the public being harassed, alarmed or distressed, or to reduce the likelihood of crime and disorder in the locality.

### Closure Orders

Section 80 ASB, Crime and Policing Act 2014. The police or LA can issue a Closure Notice in order to close premises (business or residential) which are being used, or likely to be used, for activity relating to child exploitation. A Closure Notice can shut down a premises for 48 hours after which a full closure notice would be needed to close down premises for up to three months.

### Public Spaces Protection Order (PSPO)

Section 59 ASB, Crime and Policing Act 2014. LAs can issue PSPOs after consultation with partner agencies. They can be enforced in areas such as parks and town centres. The order prevents unreasonable continuing behaviour such as congregation by groups causing ASB. Breach is a criminal offence.

### Absolute grounds for possession

Section 95 ASB, Crime and Policing Act 2014. Can be obtained by private – sector landlords and social landlords including LAs and housing associations. It is always best to link in with housing partners to consider what action can be taken against perpetrators.

### Reviews of licensed premises

Licensing Act 2003. Licensed premises have a duty to protect children on their premises from harm. Where they feature as a location for child exploitation then licensing teams should always be informed and consulted regarding what action is possible and could be taken.

### Legislation

#### Offences against children under the age of 13

Sexual activity with a child under the age of 13 is an offence regardless of consent or the defendant's belief of the child's age.

The offences are:

- rape,
- assault by penetration,
- sexual assault, and
- causing or inciting a child under 13 to engage in sexual activity.

The offences carry a maximum sentence of life imprisonment or 14 years' imprisonment, depending on which offence applies.

#### Offences against children under the age of 16

These offences apply regardless of whether the child consented to the sexual activity but, unlike the offences relating to children under 13, an offence is not committed if the defendant reasonably believed that the victim was 16 years or over. The offences are:

- sexual activity with a child,
- causing or inciting a child to engage in sexual activity,
- engaging in sexual activity in the presence of a child,
- causing a child to watch a sexual act, and

- arranging or facilitating the commission of a child sex offence.

Meeting a child following sexual grooming (under 15 an offence is committed if an adult meets or communicates with a child on at least two previous occasions, and then meets the child, arranges to meet the child or (the adult or child) travels for such a meeting, where the adult intends to commit a sexual offence).

These offences carry a minimum sentence of 10 or 14 years' imprisonment, depending on which offence applies. Where the offender is under 18, the maximum sentence is five years' imprisonment. If any of these offences are committed against a child under 13, the defendant's belief of the age of the child is irrelevant.

#### Offences against children under the age of 18

There are a number of sexual offences in the Act that apply to all children under the age of 18. These include sexual offences where there is abuse of a position of trust (ss 16 to 24) and familial child sex offences (ss 25 to 29).

When children and young people who are at risk of child exploitation are found at repeat locations, orders such as the Child Abduction Notices should be considered. The Act also provides for offences specifically to tackle the use of children in the sex industry, where a child is under 18 (ss 47 to 50).

These offences are:

- paying for sexual services of a child,
- causing or inciting sexual exploitation of a child,
- controlling a child in relation to sexual exploitation,
- arranging or facilitating sexual exploitation

of a child,

- section 67 of the Serious Crime Act 2015 creates a new offence of sexual communication with a child which will help ensure that young people are fully protected by the law and allow the authorities to intervene earlier to prevent more serious offending against children,
- sexual communications with a child. A person aged 18 years or over who communicates with a child under 16 (who the adult does not reasonably believe to be 16 or over), if the communication is sexual or if it is intended to elicit from the child a communication which is sexual. The offence applies only where the defendant can be shown to have acted for the purpose of obtaining sexual gratification. Ordinary social or educational interactions between children and adults, or communications between young people themselves, will not be caught by the offence. The offence extends to England and Wales and is subject to a two year maximum prison sentence,
- the Anti-social Behaviour, Crime and Policing Act 2014 provide three new provisions for the investigation of child exploitation offences. Ss 116, 117 and 118 allow the police to issue a notice requiring the owner, operator or manager of relevant accommodation to disclose information where intelligence indicates the premises are being, or have been, used for the purpose of child exploitation. This includes preparatory or other activities connected to child exploitation, and
- where the police reasonably believe child exploitation is taking place, can request the owner, operator or manager

to provide information about their guests. This includes the name, address, and other relevant information, e.g. age. The information supplied can be used as intelligence to support the investigation of any criminal offences which may have been or are being committed on the premises, thereby helping to identify paedophile rings and other organised groups involved in child exploitation.

#### Other specialist services of note Social media

Consider Open Source checks to develop intelligence and/or further investigations. For further advice please visit the MPS Intranet.

#### Government Agency Intelligence Network (GAIN)

A multi-agency group which brings together intelligence and investigation staff from public sector enforcement agencies to lawfully share intelligence and conduct joint investigations. Core group members include MPS, National Health Service, DWP, NCA, Environment Agency, Food Standards Agency and many others along with accredited members such as the Association of Train Operating Companies, Tesco, the Post Office and Ladbrokes, to name a few. London GAIN Coordinator – 02072308874.

#### The London Region Protected Persons Unit (LRPPU)

Provides a 24hr frontline service to police

and partners where there is a real and immediate risk to the life of an individual and the referring agency does not have the viable means to protect that person from harm. The LRPPU have a role to play in safeguarding those susceptible to violence, vulnerability and exploitation. Police can provide a range of tactical options for high-risk cases and contact should be made at the earliest opportunity. Office hours: 0845 8500453 or Pan London Contact desk 0207 109 6428.

#### **Integrated Offender Management (IOM) – (Located on all BCUs)**

IOM can complement other statutory multi-agency arrangements, such as MAPPA. It aims to help local partners jointly to reduce crime, reoffending, improve public confidence in the criminal justice system and to tackle the social exclusion of offenders and their families. IOM seeks to achieve this through a combination of interventions including enforcement, persuasive compliance and supportive offender engagement.

It should be noted that whilst offender engagement in IOM is not mandated, compliance with the requirements of the Court Order or License component of an IOM is mandatory.

## Appendix I

# Adolescent safeguarding practice framework

This framework has been designed by safeguarding partners to promote a consistent response to safeguarding older children and young people in London.

It reflects the established evidence base, best practice and an emerging set of shared principles across agencies. Local partnerships should consider how well each element of this framework is reflected within their area by individual agencies and as a collective response to the safeguarding needs of adolescents.

### Strategy

#### **To what extent does your local partnership fulfil the following aspirations?**

A shared vision, strategy and plan for partners, articulated at a local authority (LA) level, detailing the approach to, and ambition for, safeguarding adolescents.

Demonstrable political and senior leadership commitment to prioritising safety and wellbeing for older children and young people across the LA and partner functions.

Evidence that your vision is based upon the lived experience of young people in your area and informed by their voice and participation.

The strategy recognises that all young people are potentially vulnerable to harm and exploitation while also identifying specific approaches for some young people who are more likely to experience safeguarding concerns in adolescence.

Deprivation, discrimination and structural disadvantage increase the likelihood of experiencing harm and local partners both pay attention to tackling the underpinning context for these children and families and ensure that safeguarding (and public protection) responses do not exacerbate underlying inequalities through overly intrusive or punitive interventions.

The approach to safeguarding adolescents reflects the wider practice model adopted by the LA and is supported by the LA and partners' corporate structures, recognising that impactful work with adolescents will only thrive if the wider conditions for effective work with children and families are met.

### Shared Principles

#### **To what extent does your local partnership fulfil the following aspirations?**

The local partnership is able to articulate a shared set of principles for its work with adolescents. These closely align with the principles agreed for work with adolescents by the London Safeguarding Children's Partnership.

*The London Safeguarding Children's Partnership has agreed nine principles for safeguarding adolescents for statutory safeguarding partners in London. These are appended and inform each of the components of this practice framework.*

## Structure

### To what extent does your local partnership fulfil the following aspirations?

Structures to enhance adolescent safeguarding reflect the principle of organising around the child/young person thereby avoiding multiple handovers, cliff-edges at the point of transition, and are bespoke for the particular needs of adolescents, having been developed by and with young people.

Services are well integrated in order to enhance a shared professional approach to adolescent safeguarding and to aid a common understanding of the circumstances of any given child or young person. Co-location of multi-agency/multi-disciplinary staff is well-developed.

Services are accessible for young people and well-advertised, promoting improved experience and support to stay safe.

## Systems

### To what extent does your local partnership fulfil the following aspirations?

Partners share information readily to support safeguarding and have developed common data resources that support informed decision-making, both for individual children and young people and at a strategic level. This includes shared analytic capacity between partners, which supports better understanding of problem profiles and local need.

The children's safeguarding partnership has articulated and codified its understanding of levels of adolescent need in order to identify the pathways to support and promote a shared understanding of appropriate adolescent safeguarding responses.

This specifies the role of universal, targeted and specialist services, from statutory and non-statutory partners, in promoting adolescent safeguarding.

Practice in relation to missing children has been developed to be an asset to safeguarding responses, the approach is relational and information from children, parents and partners is used effectively to enhance safety.

Safeguarding adolescents in education has been given sufficient attention by educational settings and is appropriately supported by partners. Children missing/missing from education and those in alternative education are recognised as requiring increased safeguarding attention in view of heightened risk of harm/exploitation.

Partners have analysed their adolescent cohort and clearly identify what is being done to address disparities in outcomes and experience. This includes attention to BAME disproportionality (particularly in YJ, CP/ care and under-representation in CAMHS), gendered responses, and the particular needs of adolescents with SEND.

Approaches balance the young person's individual agency with that of the responsibilities of adults to promote safety for them. This includes a focus on disruption and enforcement activity against those who exploit/abuse young people.

Adolescent safeguarding is grounded in a whole system response which works in a coordinated fashion to promote a safe and healthy environment for children and young people's development.

Approaches towards enabling young people to be supported within their family and avoid the need for care are clearly articulated and agreed by the LA and partners.

Local systems are informed by evidence of the most effective responses to adolescent safeguarding, approaches are routinely evaluated and young people's voice and experience supports reviews and commissioning of services.

## Style (practice approaches)

### To what extent does your local partnership fulfil the following aspirations?

Local partners ensure that services to adolescents are grounded in relationship-based practice, are strengths-based and recognise young people as assets in their safeguarding.

The specific services designed to be delivered to/with young people are balanced with those that promote opportunities to strengthen families and parenting. Interventions are holistic in that they respond to the whole needs of the child (not a single behaviour or concern) and they work with the whole family, responding to the dynamics of the family system.

Services provided to adolescents are culturally competent and promote equality and diversity. They have been tested by groups of children and young people to ensure that they are fit to respond to a range of diversity needs and identities, including young people's experiences of racism and discrimination.

Adolescent services articulate how they respond to young people who have experienced trauma and the particular approaches adopted support trauma-recovery through a coherent theory of change.

Wider partnership services have considered and implemented measures to adapt to meet the needs of children and young people who have experienced trauma or other adverse

childhood experiences.

Responses to adolescents recognise the impact of extra-familial harm and deploy contextual approaches/tools to promote young people's safety in a range of environments outside their family home.

Services have been adapted to 'go with the grain' of adolescent development, promote young people's agency, engagement and participation.

Safeguarding and child protection processes have been adapted to the developmental needs and environmental harms specific to adolescence. Approaches such as young people's safety planning have been employed to enhance participation and ownership by young people within statutory processes.

Practice is attuned to the particular risks of criminal exploitation faced by adolescents. When a young person (under the age of 18) is believed to be involved in criminal or anti-social behaviour they are viewed first and foremost as a child rather than an offender.

Services recognise the importance of transitional safeguarding and that young people over the age of 18 remain vulnerable. Responses reflect their particular developmental needs, which may additionally be affected by trauma or learning difficulties.

Approaches to adolescent safeguarding seek to balance the safeguarding needs of children and young people with the needs of others (including other children) to be protected from them. Shared responsibilities to protect a range of children and young people and the wider public, and the tensions this can cause, are articulated within multi-agency decision-making bodies. Partners understand the potential for competing imperatives and are able to work collaboratively to discharge their responsibilities.

## Staff/Skills

### To what extent does your local partnership fulfil the following aspirations?

Older children and young people can expect those who work with them to be practitioners who want to work with adolescents and have specific skills, training and aptitude to effectively engage with young people.

In addition to specific training around adolescent development and trauma-informed approaches, those who work with young people are supported to develop practice which avoids blame, stigma, labelling or any suggestion that adolescents are responsible for the abuse/exploitation they may have experienced.

Practitioners working to safeguard adolescents are supported through reflective supervision and are provided with opportunities to share their experience of working amidst trauma through group supervision and/or peer fora. They are provided with appropriate clinical input and support in their work.

Systems for staff support recognise the impact of working with young people who experience trauma (both through serious incidents and the cumulative impact of adversity, fear and conflict) and ensure that, as well as responding to specific incidents, ongoing support for the welfare of practitioners is built into the design of services.

## Appendix

### London Safeguarding Children's Partnership Adolescent Safeguarding:

- As children get older, their increasing autonomy should be recognised, inform our response and shape how they are involved in decision making.
- The risks facing some adolescents, and the protective factors that help keep them safe, are located not only in families but also in their peer groups and wider communities. Services must therefore work in close partnership with families, peer groups and communities.
- We must never give up on children and young people because they seem reluctant to engage with services or face complex issues. We must always 'go the extra mile'.
- Responses must address the context of children and young people's lives, including the impact of different forms of social prejudice and inequality (such as race and racism).
- Policy and practice should address the need for older young people (i.e. those over 18 years) to be able to access appropriate support and protection.
- A joined-up, multi-agency response must be provided by professionals who have expertise and capability in working with older children and young people **[through service provision and structures which promote continuity of relationships and are organized around the child/young person rather than the needs of services]**.
- When a child is believed to be involved in criminal or anti-social behaviour, assessments should seek to understand safeguarding concerns **[and adopt the approach that they are viewed as children first and offenders second]**.
- Children need to be equipped with the knowledge and skills to keep themselves safe and live healthy, happy and productive lives. For older children this means high-quality sexual and relationship education **[and services which are accessible and shaped by and for young people]**.
- Strategic and operational practice must be based on sound evidence, good and shared intelligence and effective data analysis.

