



Dudley Safeguarding Children's Board

# **Child Sexual Exploitation Strategy 2015-2018**



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## FOREWORD

Safeguarding Children is everyone's business. This is particularly the case when combating child sexual exploitation. Individuals, agencies and partnerships can all play their part in many ways. It is vitally important therefore that people know what to look for and what to do. All our efforts need to be coordinated in order to maximise our effectiveness. That is what this latest version of the Dudley Safeguarding Children Board CSE Strategy sets out to achieve.

Much can be learned from other parts of the country where CSE has been identified and successfully tackled. Similarly, a cohesive approach across the West Midlands region is necessary to break down the geographical boundaries that perpetrators operate across.

But it is here in Dudley where we must focus our efforts. The development of a dedicated Child Sexual Exploitation Team is a major step forward in our efforts to prevent, protect and pursue. The team is resourced from a number of agencies and evidences true partnership commitment to work together to adopt a zero tolerance to CSE. It will benefit from a developing intelligence picture and procedures that will provide clear guidance for referral.

Greater ownership and robust coordination will also reap rewards so the Safeguarding Children Board welcomes support from the Health and Wellbeing Board, the Children and Young People's Alliance, Safe and Sound – Dudley's community safety partnership and the Adult Safeguarding Board. It is a signal of our intent to address sexual exploitation that our strategy has been revised so soon after the original version. It is brief in form yet comprehensive in scope. However it will only be of value if it is widely and effectively used.

Roger Clayton

Independent Chair Dudley Safeguarding Children Board

This document sets out the strategy for safeguarding and protecting the welfare of children and young people from Child Sexual Exploitation (CSE) across Dudley. It describes how through our partnerships we identify, assess, challenge and provide an effective service to reduce the harm and threats posed by CSE.

## **Definition of Child Sexual Exploitation**

Child Sexual Exploitation is child abuse and children and young people who become involved face huge risks to their physical, emotional and psychological health and wellbeing.

Dudley has adopted the following definition of sexual exploitation taken from Statutory Guidance on Safeguarding Children and Young People from Child Sexual Exploitation 2009:-

***“sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive ‘something’ (e.g. Food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child’s immediate recognition, for example being persuaded to post sexual images on the internet / mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person’s limited availability of choice resulting from their social/economic and/or emotional vulnerability.”***

CSE can take a number of forms and Barnardo’s has identified three areas:

- **Inappropriate relationships involving a lone perpetrator who has inappropriate power or control over a young person, whether physical (including domestic abuse), emotional or economic. There is likely to be a significant age gap between the perpetrator and victim. The young person may believe that they are in a loving, equal relationship.**
- **The ‘boyfriend’ model of exploitation and peer exploitation – the perpetrator befriends and grooms a young person into a ‘relationship’ and subsequently coerces them to have sex with friends or associates. This includes gang exploitation and peer – on – peer exploitation.**
- **Elements of organized /networked sexual exploitation or trafficking – Young people are passed through networks of offenders, possibly between towns and cities, where they may be coerced into sexual activity with multiple men. Victims may also be used as agents to recruit other children and young people. Where there are groups of offenders in a network, these should be considered as Organised Crime Groups (OCGs).**

CSE is complex and widespread and can manifest itself in different ways. In all cases those exploiting the child or young person have power over them, perhaps by virtue of their age or physical strength. Exploitative relationships are characterised in the main by the child's limited availability of choice, compounding their vulnerability. This inequality can take many forms but the most obvious include fear, deception, coercion and violence.

Children and young people from Black and Minority Ethnic Communities can have specific vulnerabilities associated with their culture which constitute a barrier to disclosing or reporting the abuse e.g. blackmail connected to shame and dishonor can be used as a method of control. In addition, if a child or young person from a BME community discloses they have been sexually exploited, they may face additional dangers from their family and the multi-agency response will need to recognise and respond to these risks, e.g. blaming female victims rather than the perpetrator(s) or risk forced marriage.

It is not just an issue for girls and young women, but also a reality for boys and young men. However, it can be more difficult to detect when boys and young men are at risk of sexual exploitation or are being sexually exploited, as they are generally harder to work with and less willing to disclose this type of information. They may also find it harder to disclose that they are being abused by other men because of issues about sexual identity. It is important that professionals who are assessing young men do not become distracted when exploring their sexual identity and fail to notice that they may be being, or are at risk of being sexually exploited.

Sexual exploitation can take many forms from seemingly 'consensual' relationships where sex is exchanged for attention, affection, accommodation or gifts, to serious organised crime including group and gang related exploitation as well as child trafficking.

Whatever their experience of child sexual exploitation, it is important to be aware that children and young people are not making a free and informed choice to participate in the sexual activity. They often make constrained choices against a backdrop of vulnerability and because of their age, unmet needs or vulnerability they are unable to give informed consent. Young people under the age of 16 cannot legally consent to sexual activity. Sexual intercourse with children under the age of 13 is statutory rape. A child under 18 cannot consent to their own abuse through exploitation.

Technology can play a significant part in sexual abuse, for example, through its use to record abuse and share it with other like-minded individuals or as a medium to access and groom children and young people including through social media sites. Victims may also be recorded being abused, for example on mobile phones and those images shared or used as another means of threatening, humiliating or coercing the child.

The perpetrators of sexual exploitation are often well organised and use sophisticated tactics. They are known to target areas where children and young people gather without much adult supervision, e.g. parks, shopping centre's and/or sites on the internet. It is critical that local partnerships have a shared understanding of the local CSE problem and a co-ordinated approach to prevention, protection, disruption and enforcement.

## **Possible Indicators**

There are a number of key indicators that may suggest a child is being sexually exploited and these are identified within the NWG Screening tool Dudley have adopted as part of its procedure/pathway.

The list is not exhaustive but includes:

- Going missing for periods of time or regularly coming home late
- Regularly missing school or education or not taking part in education
- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Contracting sexually transmitted infections
- Mood swings or changes in emotional wellbeing
- Drug and alcohol misuse
- Displaying overtly sexualized behavior
- Involvement in gang activity

When children and young people display any of the above characteristics, consideration must be given to an assessment being undertaken to establish if they are at risk of or are being abused through CSE. All organisations involved with children should be able to recognise these risk indicators, such as schools, youth services, voluntary sector organisations, health, and social care. Local research indicates that unauthorised absences from school as well as missing from home or care episodes are currently the most significant indicators of CSE.

## **Governance and Accountability:**

The 7 Regional LSCB's have responsibility for overseeing the co-ordination and ensuring the effectiveness of the individual and collective systems that respond to CSE.

Whilst DSCB has overall responsibility for ensuring the effectiveness, it is critical that DSCB works in conjunction with the safe and sound, the local Community Safety Partnership (including the **Police & Crime Boards**) **Local Safeguarding Adults Boards, Children and Young People Alliance** and **Health and Wellbeing Boards**.

Relevant statutory agencies have individual and collective responsibility to ensure that children, young people and adults at risk are properly safeguarded. As such all key strategic plans, whether formulated by individual organisations or partnerships, should consider this strategy to safeguard children from CSE.

## **National Context**

This strategy is underpinned by a number of national guidance documents, key research and tools including:

- Statutory Guidance on Safeguarding Children and Young People from CSE 2009
- University of Bedfordshire 2011 research into LSCB response to CSE.
- Department of education 'tackling child sexual exploitation – action plan 2012
- CEOP's Thematic Assessment 'Out of Sight, Out of Mind'

- Review recommendations from Rotherham, Oxford and Birmingham Local Authorities.

A series of recommendations have been made following the Government response to CSE March 2015 which stated that to ensure this very vulnerable group of children are safeguarded and protected, agencies work collaboratively together sharing information and intelligence to protect vulnerable children, to work on a prevention strategy and for offenders to be brought to justice through successful prosecutions. Assessments of young people need to be robust and identify need at the earliest point. Service provision needs to be coordinated and targeted to support children at the earliest point when concerns are identified.

One of the recommendations from the Government Report includes the introduction and implementation of a new whistle blowing national portal for reports related to child abuse. The portal is intended to help bring CSE issues to light and spot patterns of failure across the country.

### **Regional Context**

Over the last 18 months the 7 West Midlands local authorities: Dudley, Wolverhampton, Walsall, Sandwell, Birmingham, Coventry and Solihull have worked together with the Police, Health and other public and voluntary sector partners to identify and respond to CSE. This work is underpinned by the West Midlands area CSE Framework 2015.

The West Midlands Regional CSE Strategic Group is chaired by Solihull Local Authority Chief Executive Nick Page. This Strategic Group monitor the Regions response to CSE and ensures that the Regional Framework is embedded across the 7 Local Authorities.

The framework has 5 components and is based on the Office of the Children's Commissioner's If only Someone Listened Inquiry report.

- Accountability for all safeguarding and strategic co-ordination
- Multi- agency strategic planning
- Partnership and information sharing for identification and assessment
- Coordination of multi-agency strategic groups
- Intervention and service delivery

The West Midlands CSE Framework 2015 can be found on [www.seeme-hearme.co.uk](http://www.seeme-hearme.co.uk) and must be read in conjunction with this strategy.

### **Dudley Context**

Dudley Council Plan has an objective under stronger and safer communities which states that it will develop and roll out a programme and awareness of CSE and work towards zero tolerance within the Borough.

Dudley Safeguarding Children's Board strategic priority for 2015-2018 is to keep children safe inside, outside the home and online with a specific CSE objective for 2015/16.

In order to deliver against the strategy and to ensure consistent approach and effective coordination of Services to address CSE, Dudley Council with partner agencies has developed a multi agency CSE team.

### **CSE Team**

The CSE team comprises of the following:

- IYS Youth worker
- Runaways project
- Teenage pregnancy team
- Police CSE coordinator
- CSE Coordinator
- Early intervention social worker
- School health advisor
- Voluntary Organisations; Streets Team, Phase Trust, Barnardo's.

The remit of the Child Sexual Exploitation Team is to:

- Receive and screen all CSE referrals
- Raise awareness of CSE risk indicators and referral processes within all agencies
- Raise awareness amongst the community to implement a community council approach to zero tolerance to CSE.
- To provide CSE training and briefings to all partner agencies.
- Provide a rapid response to the investigation of CSE
- To undertake MASE meetings for low and medium risk cases
- To attend MASE meetings for open allocated cases in Children Services
- Reduce and prevent CSE by deterring, disrupting and prosecuting offenders
- Support young people to be able to identify themselves as victims of CSE
- To support parents and carers in understanding the implications of CSE and reducing the risks.
- To deliver specialist therapeutic services
- To signpost to early intervention services
- To coordinate the intelligence and data as required in line with the Regional Framework
- To undertake multi agency audits to support a cycle of learning and development for the remit of CSE.

The CSE team will have a dedicated CSE coordinator post. This post will be funded for a year and administered through DSCB. The post is resourced from Proceeds of Crime Act 2002 funds and Children Services. Whilst this is funded for 12 months initially, DSCB will be reviewing this for a longer term position in order to provide continuity and focus on CSE concerns/developments.

The team will operate initially through Parsons Street, Integrated Youth Support. As the Directorate develops its single front door and MASH (multi agency safeguarding HUB) arrangements, the CSE team will be co-located with MASH in order to share information, intelligence and receive appropriate referrals. A timely response for

those requiring action under section 47 of the Children Act 1989 will be progressed into Children Social Care without delay and have consistency embedded with oversight from the CSE coordinator.

The CSE team can be contacted on 01384 817777

Email address: (internal) [CSE.team@dudley.gov.uk](mailto:CSE.team@dudley.gov.uk)

(external) secure address: [CSE.team@dudley.gcsx.gov.uk](mailto:CSE.team@dudley.gcsx.gov.uk)

### **DSCB sub group**

The Vulnerable Children's Strategic Group and YPSE panel are tasked to focus on the regional framework delivery plan which in broad context concentrates on Prevent, Protect and Pursue.

YPSE panel currently offers partner agencies advice and services to children where concerns identified through the National Working Group screening tool are assessed as low, medium and high.

In September 2015, YPSE will become a strategic panel where information and intelligence is shared on victim, offender profile and hotspots. In conjunction with all partner agencies a plan will be devised to disrupt activity where agencies become aware of this, and for information about prosecutions to be shared. YPSE will have oversight of data and intelligence gathered to ensure it is in a better position to know the scale of the issue in Dudley and to ensure a robust plan is in place to tackle any intelligence on offender / location information.

DSCB Vulnerable Children's Strategic Group will hold overall responsibility for the CSE strategy and action plan. All partner agencies will be held to account against the action plan and related outcomes. Vulnerable Children's Strategic Group will provide a yearly report to DSCB updating against outcomes achieved and areas of further intervention and action. The CSE 'plan on a page' follows three distinct areas of prevent, protect and pursue and should be read in conjunction with this strategy.

**Prevent:** this requires a coordinated systematic approach across DSC partners and is critical to the identification and protection of children and young people as well as raising awareness amongst agencies and communities. The aim is to prevent children and young people from becoming victims of CSE and to prevent certain locations being used to recruit, groom and abuse children and young people. In order to deliver against this the CSE action plan will deliver against the following:

- Raising awareness of CSE amongst children and young people, parents, communities, council and elected members, partner agencies.
- Use specific resources to facilitate discussions and develop awareness.
- Target the most vulnerable children i.e. mental health issues, children who misuse drugs/alcohol, learning difficulties, children with disabilities and special needs.
- Target interventions with those individuals whose work places them in a position where they will notice and could then report worrying behaviours i.e. taxi operators, hoteliers, fast food operators, parks and leisure services.

**Protect:** Safeguarding and promoting the welfare of children and young people in this context in line with safeguarding children generally depends on an effective joint working between different agencies and professionals that work with children and young people including education, health services, youth services and Children services together with criminal justice agencies and voluntary sector services supporting children and families.

Where an individual is concerned about a child /young person being at risk of CSE they should follow DSCB child protection procedures and refer to the CSE pathway for the protocol on identification, contact, referral, assessment and planning to meet identified needs/protection requirements.

**Pursue:** Any meeting in respect of an individual at risk of harm from CSE will have a disruption plan in place for identified offenders. The plan will identify who is responsible for undertaking the work, shared with agencies involved and a review of the plan actioned within regular timescales.

In addition to this the following will take place:

- CSE coordinator and partner agencies will identify links and trends along with any cross border issues.
- Integrated Offender Management group and YPSE panel will share intelligence and information in relation to local hotspots and locations requiring a partnership approach to safeguard children. Locations may include night time economy venues, hotels, food outlets, taxi ranks, outside schools, addresses frequented by missing children or other venues where perpetrators may prey on victims.
- Neighborhood Policing Teams will be appraised of intelligence in order for them to participate in disruption activity and share any other related intelligence.

### **Information sharing**

In March 2015, updated guidance was produced on Information Sharing for practitioners providing safeguarding services to children, young people, parents and carers - [Information sharing advice for safeguarding practitioners - Publications - GOV.UK](#)

West Midlands Police have developed an information sharing tool (**Appendix A**) to be used by front line practitioners to share information with regard to Child Sexual Exploitation. **Appendix B** sets out the West Midlands Metropolitan Area Information Sharing Protocol. Due to the nature of information often being anecdotal or unsubstantiated, such sharing must be done with sensitivity to data protection, confidentiality and human rights. However, it is often small seemingly innocuous pieces of information that come together to identify those who present risk.

The information will be assessed by West Midlands Police and filtered through police intelligence as appropriate.

## **Missing Children**

Missing children and young people may be at increased risk of CSE and should be reported as missing to the Police at the earliest opportunity. Once a missing child is located they will be debriefed by Runaways Project and within 72 hours of return have a return interview. All missing children will be screened for CSE and the local procedure and pathway must be followed to ensure that the child young person receives the appropriate single agency or multi agency response. DSCB will have oversight of all missing children, whether from home, care or education in order to track these vulnerable children against CSE intelligence and information. This detail will be discussed at YPSE meetings and related action to protect children will be formulated with partner agencies.

## **Trafficking**

Children who are abused through CSE may also be trafficked. There are three different types of trafficking of children for the purposes of sexual exploitation:

- Trafficking from abroad into the UK
- Internal trafficking where children are moved from one place to another in the UK for the purposes of sexual exploitations. This may be from one street to another, from one town/city to another or across local authority borders
- Trafficked out of the UK to other countries and brought back again.

Trafficking children, including for the purpose of sexual exploitation is a criminal offence and concerns that a child may be trafficked should always be reported to the police.

Anyone who works with children and young people who has concerns that the child has been trafficked must refer the child to the National Referral Mechanism (NRM) for a decision on the status of the potential victim of trafficking. The procedure for referring is located in DSCB Child Protection procedures.

<http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism>

## **Transition**

Transition into adulthood is critical and a protocol is being devised in conjunction with adult services under the Care Act 2014. This protocol will ensure that young people who are at risk of CSE will continue to receive services and levels of intervention based on assessed needs. In line with this, it is proposed that children that are reaching the age of 18 will be discussed at YPSE if they are a victim of CSE. This will enable a robust pathway to be followed through into Adulthood.

## **CSE procedures**

CSE procedures can be found on DSCB TriX Child Protection Procedures

<http://www.proceduresonline.com/dudley/scb/>

The CSE referral pathway is attached. All CSE referrals will be received by the CSE team who will screen the referral tool and inform the referrer on the planned outcome. Some Category 3 referrals will go directly into Children Services given the high level of concern and the need to act immediately to protect the child. A child

Protection Strategy meeting will be convened in such instances and the CSE team will be informed in order for timely information sharing and attendance to strategy meeting. This will ensure a coordinated response between the CSE team and Children Services.

## **CSE Pathway: Appendix C**

### **Data and CSE Profile**

DSCB will be collating data and CSE profile information in conjunction with Dudley Local Policing Unit. This data is collated in line with the Bedfordshire toolkit and will feed into the regional dataset. It will be held by the CSE team and shared at YPSE panel and at Vulnerable Children's Strategic Group to ensure oversight and delivery against the action plan. Vulnerable Children's Strategic Group will further use data and intelligence to inform Service need and to target intervention in particular hotspot areas.

The outcomes of the plan will be tracked on a quarterly basis to ensure we are learning and developing responsive services. This will also be shared on a regional basis each quarter to inform the West Midlands wider intelligence of CSE threat.

Each partner will have in place its own agency action plan to support overall delivery of this strategy in their service. DSCB will review progress on the delivery of the strategy on a quarterly basis and will be informed through the DSCB data scorecard for CSE/Missing children.

## **CSE action plan: Appendix D**

### **Training and Raising Awareness**

DSCB will provide multi agency CSE training and raising awareness sessions to partner agencies, governing bodies, council members, elected members and communities. A robust programme is being devised which will detail this further and will be included in the CSE action plan.

Raising awareness amongst the hotel and tourism industry is a priority for Dudley Council. Hotels have received bespoke training sessions and the CSE team will continue this work through building links, sharing information where relevant and providing materials to hotels to ensure their staff are briefed and know what signs to look out for.

### **Licensing team and Taxi firms**

Dudley council will ensure a Dudley pledge is devised. This pledge will ensure that the licensing teamwork with the CSE team and the council to support the priority towards zero tolerance against CSE in Dudley. The pledge will include mandatory training for all taxi drivers as part of their license conditions. The licensing procedures will be updated to reflect this commitment by the Council. It is our belief that taxi firms and drivers are our eyes and ears and that we can work in partnership to eradicate CSE from our streets.

## **Outcomes – how will we know?**

The overall aim is Zero Tolerance to CSE. We will know we achieved this when:

- Children report they are safe from CSE.
- When communities tell us that CSE is not a concern for them in Dudley
- When partner agencies report a reduction of concerns related to CSE
- When services such as hotels, restaurants, fast food outlets, taxi firms tell us that they are no longer concerned about CSE

DSCB will monitor this outcome on a yearly basis and use information available from consultations, audits and performance data to advise on progress.

With grateful thanks and acknowledgement to Rotherham LSCB and West Midlands Regional Strategic Forum.

Created by Jassi Broadmeadow / Helen Ellis – July 2015

Approved – September 2015

Due for review – April 2016

**Appendix A  
Child Sexual Exploitation  
INFORMATION REPORT**

Date/time of report.....

<b>Name</b>					
<b>Post/Job Title</b>					
<b>Agency</b>					
<b>Contact details</b>					
<b>Witnessed incident</b>		<b>Professional</b>		<b>Member of the public</b>	

If the information was supplied by someone other than yourself, on a scale of 1 – 5 how reliable do you think they are?

(5 = always reliable and 1 = unreliable).....

How accurate is the information on a scale of 1 – 5?

(1 = known to be true without doubt to 5 suspected to be false).....

If you are not able to say re above two questions please state “don’t know” rather than guess

If the information is from a 3rd party would they be willing to engage with the police?    Yes  
No

Does this information involve a licensed service (e.g. newsagents, takeaways, pubs, off licences, taxi’s etc)?

If yes please provide trading name and address of premises:

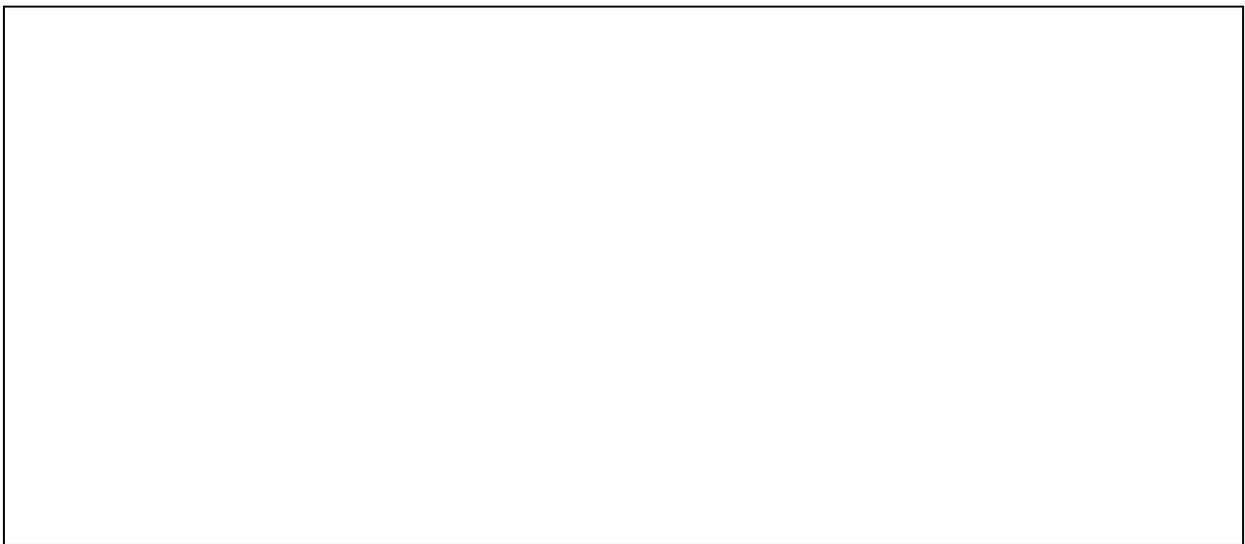
.....

.....

.....

.....

**Please provide clear & accurate information: Include as much detail as possible re names / descriptions / nicknames / vehicle details / addresses etc: (if providing details of specific incidents please put a date and time these were witnessed)**



**If you have access to secure email please forward this report to West Midlands Police Intelligence department on [fib@west-midlands.pnn.police.uk](mailto:fib@west-midlands.pnn.police.uk) - OR - contact the Missing From Home officer in your area - OR - hand deliver to Safeguarding and Review Service, Corbyn Road, Dudley, DY1 2JZ**

## **Appendix B**

### **West Midlands Child Sexual Exploitation Multi-agency Information Sharing Protocol (February 2012)**

The purpose of the Protocol

- What is an Information Sharing Protocol?
- Who does the Information Sharing Protocol affect?
- The benefits of this Information Sharing Protocol
- Principles of Information Sharing
- Obtaining and Sharing Information

The protocol will detail:

- Confidential Information
- Obtaining Consent
- Sharing Information Appropriately and Securely
- Retaining and Storing Information
- Regular Review

Contained within are:

- Information Sharing Flowchart
- Signatories to the Protocol
- Information Sharing Checklist
- Legislation
- Information sharing template

Key Messages

- The welfare of a child or young person must be the first consideration in all decision making about information sharing
- Professionals can only work together to safeguard and promote the welfare of children and young people if they share relevant information
- Only share as much information as is needed but share enough to achieve the purpose for which information is being shared
- Recognise that where a child, young person or family needs the support of a number of different agencies, information sharing will be an ongoing process
- It is best practice to obtain consent to share information, although there are exceptions to this in child protection cases, for example, situations where a child would be considered to be at risk of significant harm or a Police investigation into a serious offence would be prejudiced.

#### **Purpose of the Protocol**

The purpose of this information sharing protocol is to provide a framework for the appropriate sharing of information between partners. The protocol informs all partners about the circumstances when information is shared in cases of CSE and how the sharing of information will be managed.

#### **What is an Information Sharing Protocol?**

The protocol governs the sharing of information and in doing so it:

- Clarifies the legal background in respect of information sharing
- Sets out the current codes of practice, best practice and guidance
- Outlines the principles of the process of information sharing
- Provides practical guidance on how to share information

### **Who does the Information Sharing Protocol affect?**

The protocol affects all staff engaged with work that requires information to be shared with or is given to them by other organisations.

The benefits of this Information Sharing Protocol

- Helps remove barriers to effective information sharing
- Provides guidance to assist in complying with legislation
- Helps to ensure that consent to share personal information is obtained whenever it is required
- Helps to ensure that information is shared when there is a requirement to do so
- Helps to ensure that all agencies comply with relevant legislation
- Raises awareness amongst all agencies of the key issues relating to information sharing and give confidence in the process of sharing information with others

### **Principles of Information-Sharing**

Effective information sharing underpins integrated working and is a vital element of both early intervention and safeguarding. Each partner can hold different pieces of information which need to be placed together to enable a thorough assessment to be made.

To share information about a person you need a clear and legitimate purpose to do so, as this will determine whether the information sharing is lawful. For partners working in statutory services, the sharing of information must be included within the powers of the service. This will also apply if partners from the voluntary sector are providing a service on behalf of a statutory body and information sharing should be explicitly addressed in the contract or service level agreement.

### **Obtaining and sharing information**

The sharing of information must have due consideration with the law relating to confidentiality, data protection and human rights. Having a legitimate purpose for sharing information is an important part of meeting those legal requirements. It is important only to share as much information as is needed and records should be accurate, relevant and up to date.

### **Confidential information**

Confidential information is:

- Private or sensitive personal information
- Information which is not already lawfully in the public domain or readily available from another public source
- Information that has been shared in circumstances where the person giving the information could reasonably expect that it would not be shared with others

## **This is a complex area and you should seek advice from your organisation's Information Manger, if you are unsure about confidentiality**

Signatories to the protocol may lawfully share confidential information without obtaining consent if this can be justified in the public interest. Judgement is required on whether there is sufficient public interest using the facts of each case individually. Public interest can arise when protecting children from significant harm, promoting the welfare of children or preventing crime and disorder.

Proportionality and necessity are factors to be taken into consideration when deciding whether or not to share confidential information. In making the decision, practitioners must weigh up what might happen as a result of the information being shared against what might happen if it is not and apply their professional judgement.

The nature of the information to be shared is also significant where the information is sensitive and has implications for the practitioner's relationship with the individual, recognising the importance of sharing information in a timely manner if it is in the child best interest to do so.

## **Where there is a clear risk of significant harm to a child, or to prevent and detect a crime the public interest test will almost certainly be satisfied**

### Obtaining consent

Consent must be informed, in other words the person giving consent needs to understand:

- Why the information needs to be shared
- Who will see it
- How much will be shared
- What are the purposes and implications of sharing.

It is good practice for signatories to set out their policy on sharing information when clients first join a service and when securing information, the process should be transparent and respect the individual. Consent must not be obtained by coercion and must be sought again if there are to be significant changes in the use to be made of the information.

A child or young person, who is able to understand and make their own decisions, may give or refuse consent to share information. This would generally include children aged over 12, although younger children may have sufficient understanding. The child's view should be sought as far as possible. If a child is competent to give consent or refusal but a parent disagrees each individual case should be considered and again professional judgement should be applied.

When assessing a child's ability to understand, practitioners should explain in a way suited to their age, language and likely understanding. Where a child cannot consent, a person with parental responsibility should be asked to do so, on their behalf, although there are circumstances where this might be inadvisable. Where parenting is shared only one person with parental responsibility for a child needs to give consent.

It may not be appropriate to let a person know that information about them is being shared nor to seek their consent to share the information. For example, this would arise when sharing information is likely to hamper the prevention or investigation of a serious crime or put a child at risk of significant harm.

In these circumstances, practitioners need not seek consent from the person or their family nor inform them that the information will be shared. Practitioners should record the decision and rational for doing so.

Similarly, consent need not be sought when practitioners are required to share information through a statutory duty or court order. However, in most circumstances they should inform the person concerned that they are sharing the information, why they are doing so and with whom.

#### Sharing Information Appropriately and Securely

Information should be shared in accordance with the principles of the Data Protection Act 1998 and follow the policy and procedures of the signatory service.

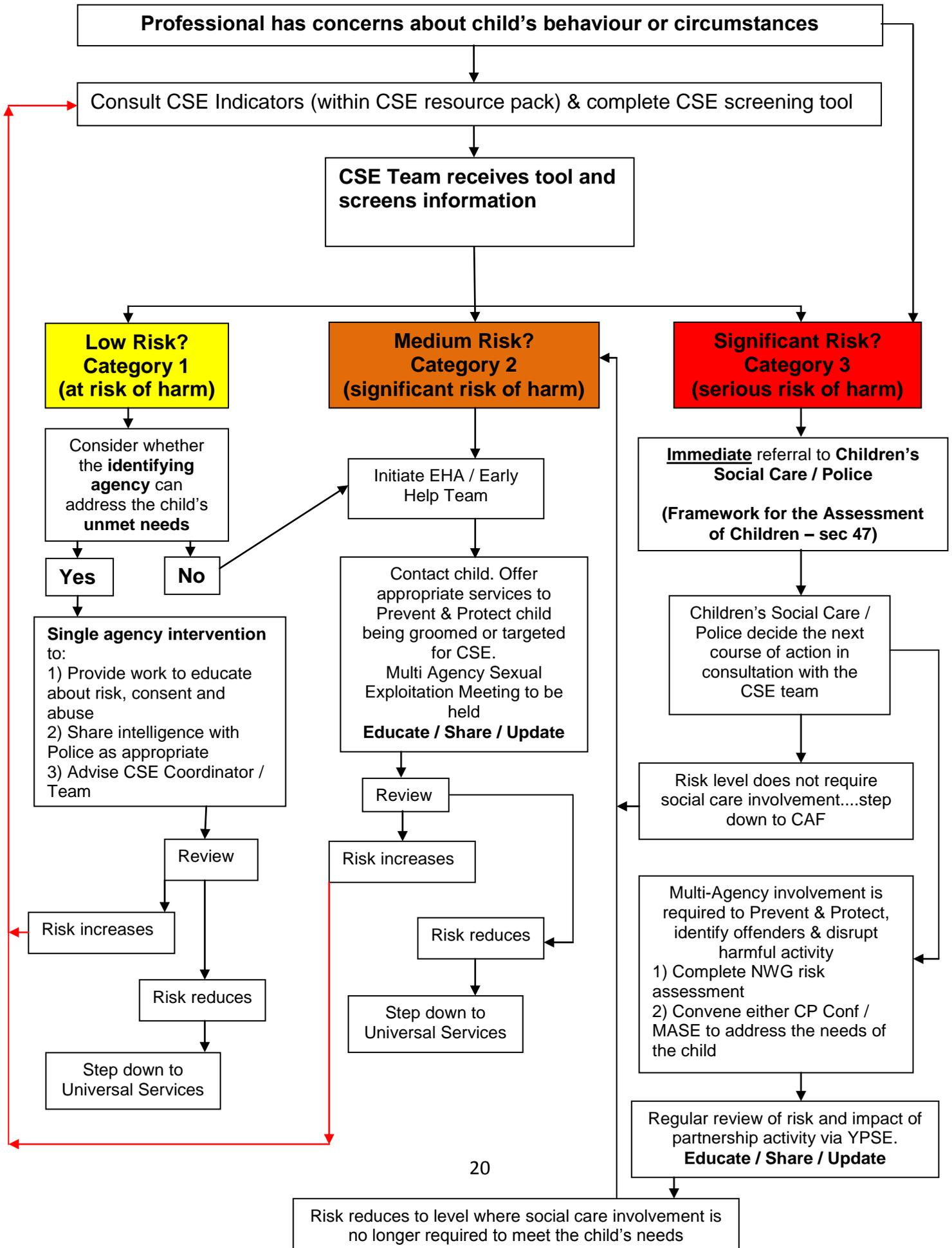
Practitioners should:

- Only share the information which is necessary for the purpose
- Understand the limits of any consent given, particularly if it is from a third party
- Distinguish between fact and opinion, information and intelligence
- Only share it with the person or people who need to know and check that the information is accurate and up to date
- Record decisions on sharing information and the reasons for doing so or not
- If deciding to share the information, record what was shared and with whom
- Know and discuss the risks posed against the young people in respect of whom information is to be shared
- Share information/intelligence relating to the risk posed towards the young person sufficiently to reduce their risk of harm.
- Complete intelligence forms (See below) to share with police and partners for submission via the panel/meetings or in between meetings
- Contact police with urgent information/intelligence that increases the risks posed towards a young person being sexually exploited.
- All information and intelligence will be considered to devise a risk management plan to reduce the risk of significant harm; and disrupt offenders and bring them to justice
- Information to be sent using secure e-mail between organisations.

#### Retaining and storing Information

Information must not be retained for longer than necessary for the purpose for which it was obtained. Signatory services should ensure that they have physical and electronic security in place for the stored data and that there is awareness, training and management of the systems where the information is stored.

**APPENDIX C  
DUDLEY's Multi-Agency Referral Pathway**



APPENDIX D

# **Dudley Child Sexual Exploitation Action Plan 2015/16**

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## CSE – Child Sexual Exploitation – Dudley

### Action Plan 2015-16

1.0 Safeguarding Board					
Action	Lead	Target Date	Current Position	Performance Measures and Milestones	Outcomes / Impact
1.1 A clear CSE Strategy is in place.	DSCB/Head of Safeguarding and Review/Head of Family Solutions	March 2016	A strategy is in place to be reviewed August 2015.  To be signed off at the Safeguarding Board in September and CYPP.	By the 1 <sup>st</sup> October 2015 all Managers and practitioners will be aware of the strategy.  Strategy to be shared with Safe and Sound (Dudley's Community Safety Partnership) strategic board and sub groups end of September 2015	The strategy has been approved by the board. Due to changes to the Regional Framework the strategy will be reviewed August 2015
1.2 Share strategy, framework and action plan with Children and young people's partnership and Health and Wellbeing Board	Head of Safeguarding and Review and Head of Family Solutions	July 2015	CYPP in September Safeguarding Board in September Health & Wellbeing Board.	By the end of September 2015 the boards will know and agree the forward plan for CSE.	
1.3 Continue to lead the regional communications and engagement strategy raising	Communications Team	March 2016	On-going awareness raising work in line with the agreed communications plan	Regional conference delivered in July to launch the revised CSE framework that all organisations	Monitoring of the website stats,

awareness of child sexual exploitation.				across the region will work to – attended by CSE leads from across the region. New look website launched featuring bespoke areas for parents and carers, young people, professionals , businesses and schools. Content is tailored specifically for the target audiences. Website features an interactive film to engage young people in thinking and talking about CSE. Bespoke materials for taxi firms produced and distributed. Further regional awareness campaign work planned for the autumn	
1.4 Develop the Vulnerable Children’s Strategic Group to be accountable to progress the action plan with	Vulnerable Children and Young People’s Group	March 2016	The group meets on a bi-monthly basis.	Launch the action plan to the group in August 2015.	

partners.					
1.5 Develop the YPSE panel to become a strategic intelligence led group.	Police / Partner agencies	To be reviewed March 2016	Police intelligence is currently being built through the current YPSE arrangements.	CMOG to be established during September 2015.	YPSE Panel meeting on a fortnightly basis until the CSE Team is up and running on the 1 <sup>st</sup> September. Decision to continue with YPSE for next 3 months during transition of CSE Team.
1.6 Develop the local CSE website page to link with DSCB.	DCSB Business Manager / CSE Co-ordinator	To be updated on a regular basis.	CSE website will be complete in July.	Detailed and up to date CSE page on the Safeguarding website to be complete by the end of July 2015.	
1.7 Develop a consistent process of auditing all CSE cases with partners.	DCSB Partners / Head of Safeguarding and Review	Process and timetable to be complete by the end of July 2015 and then audits ongoing throughout 2015	5 cases have already been audited by DSCB partners	All CSE cases to be audited and mapped.	
1.8 Panel to be developed to discuss and action all missing Care, home and education) and CSE nominals.	Head of Safeguarding and Review and partner agencies	End of July 2015 to be reviewed September 2015.		Panel to be in place by the end of September 2015 with clear Terms of Reference.	
<b>2.0 Prevention</b>					
2.1 Work in partnership to map across the voluntary	Voluntary Sector / Local Authority	September 2015	Two meetings have taken part another is planned in July.	Phase Trust, Street Teams and Barnardo's	By the 1 <sup>st</sup> September we are clear of Voluntary Sector

sector activity to support universal awareness raising in all educational establishments.			Develop a prevention strategy.	to receive referrals through the CSE Team where appropriate for low/medium cases.	engagement
2.2 Continue to work in partnership with both Primary and Secondary Schools to assess support and delivery to young people 'at risk'.	Schools / Agencies / Local Authority/CSE Team	March 16	There is a need to make sure that all schools have a universal understanding or approach to CSE.	Identify Lead School to work with CSE Team to raise awareness amongst their peer groups of CSE, how to identify, report and respond.	Identify Lead School Oct 15  Plan and deliver a Conference to target schools to raise awareness and engage all schools in addressing CSE in their settings.
2.3 Assess the effectiveness of Miss Dorothy.com with both Primary and Secondary Schools.	Schools / Local Authority/Voluntary Sector/CSE Co-ordinator	October 2015	Awareness raising to schools both Primary and Secondary is not currently co-ordinated.	Full briefing plan to be in place by the end of September 2015 for both Primary and Secondary.	
2.4 Deliver a multi-agency and single agency training programme for all partners to deliver key messages and embed procedures.	CSE Team	March 2016	CSE Co-ordinator currently pulling all information together so team co-ordinates all activity.	Training plan to be in place by the end of September 2015.	
2.5 Deliver CSE training to all Cabinet Members and School Governors	Police / Local Authority	September 2015	Meeting arranged with Head of Governing Service in June to plan sessions.	All Cabinet Members and School Governors will have a clear understanding of CSE in Dudley.	

				Session to take place on the 24 <sup>th</sup> September 2015.	
2.6 Hold a community awareness conference alongside elected members.	Voluntary Sector / Local Authority / Partner agencies	October 2015	First planning meeting has taken place some challenges so further discussions need to take place.	Date yet to be confirmed.	Task and Finish Group in place which includes Voluntary / Organisations representation.
2.7 Deliver training for all taxi drivers to also include licensed operators drivers and escorts	DSCB training team	Ensure every driver & passenger assistants who transport vulnerable children for DMBC hold a current safeguarding certificate in line with their licencing conditions.	Ongoing training programme during key school holidays; February, May, August, October.  Future developments to deliver CSE Awareness sessions for taxi drivers and passenger assistants.	Numbers are dictated by licensing demands and renewal.	All participants will have an awareness and understanding of what to do if concerned that a child has been abused or is at risk of abuse of neglect including current safeguarding issues including CSE and Internal Trafficking. Robust records of attendee's are maintained by DMBC Transport Section including identity checks.
2.8 Continue to ensure there are clear strategies in place with Hotels.	CSE Team/Police	December 2015	Current process is under review.	Strategy to be reviewed during September 2015	

2.9 Work alongside Public Health in order to raise the profile of CSE to all Sexual Health Providers. This includes mandatory training and clear understanding of referral pathways within all commissioning arrangements.	Sexual Health Implementation Group / Public Health	March 2015	Current Sexual Health specification is under review and will go out to tender in October.		Task and Finish group in place working on a new specification.
2.10 Continue to develop the transitions protocol with adults ensuring CSE has clear pathways.	Children's Services / Adult Services	June 2015	Protocol is currently in draft form and being consulted on.	Protocol to be signed off beginning of September 2015	
<b>3.0 Protection</b>					
3.1 Recruit and appoint a CSE Co-ordinator.	DSCB	July 2015	CSE Co-ordinator has been appointed and will start the 10 <sup>th</sup> August 2015.	Work with Board to secure permanent funding.	CSE Co-ordinator has now been appointed.
3.2 Work with partners to secure funding for a permanent CSE Co-ordinator role.	DSCB	July 2015	Funding in place until March 2016	LSCB to make decision regarding funding by the beginning October 2015	
3.3 Develop a CSE Team to receive CSE referrals and manage low to medium	Head of Family Solutions and Head of Safeguarding and Review	September 2015	CSE Team in place.	The CSE Team are currently reporting against a quarterly both	

risk cases.				regionally and locally.	
3.4 Support the development of the MASH ensuring timely response for those requiring action under section 47 of the Children Act 1989.	Chief Officer and partner agencies	April 1 <sup>st</sup> 2016	MASH Board and Operations Group in place to drive this forward.	Single Point of Access to be in place by the 30 <sup>th</sup> November 2015.  MASH to be in place by the 1 <sup>st</sup> April 2016.	
3.5 In the absence of MASH interim arrangements to be made clear to all partners to ensure all section 47 enquiries are managed appropriately.	Chief Officer Children's / Head of Family Solutions and Head of Safeguarding and Review	September 2015	CSE Team and YPSE are currently managing referrals and screening each referral on a daily basis.		
3.6 Children Missing to be mapped against CSE risk indicators.	DCI / DI / Head of Family Solutions and Head of Safeguarding and Review/CSE Team	August 2015	System is slowly being developed to combine data performance against both CSE and missing.		
3.7 Children Missing and Children Missing Education groups to be combined.	Head of Family Solutions/Head of Safeguarding and Review/Manager of CSE Team	March 2016			
3.8 Develop a comprehensive one point data collection set which includes, missing, children missing education	Vulnerable Children's Strategic Group	November 2015	First meeting has taken place with I.T and Data Performance to commence process mapping.	A robust data performance system that brings missing and CSE together using the Bedfordshire model by November	

and CSE using the Bedfordshire model.				2015.	
3.9 Continue to build relationships with the Licensing Team and taxi firms across the borough.	Head of Safeguarding/CSE Co-ordinator	September 2015			
3.10 Dudley Council to devise a pledge which details commitment to zero tolerance.	Head of Safeguarding and Review/CSE Co-ordinator	September 2015			
3.11 Establish a robust process to capture the voice of the child and informs service delivery.	CSE Team	Ongoing			
<b>4.0 Pursue</b>					
4.1 Work in partnership to ensure that enforcements and prosecutions are robustly followed.	DCI and DI / Vulnerable Strategic Group	September 2015	YPSE chaired by DI Booth on a fortnightly basis until September 2015.  Vulnerable Strategic Group chaired by DCI Holmes.  Missing and CSE panel to be developed July 2015.	Detail of numbers of identified offenders, numbers prosecuted / disrupted including other tactics such as harbouring notices.	
4.2 Dudley LPU to meet to	Police	March 2016			LPU to follow TTCG structure

discuss Offender location profiles.					details to be fed into YPSE and MASE meetings.
4.3 Deliver a mapping workshop between LPU and YPSE members to share intelligence.	LPU/YPSE/Local Authority	July 2015 complete first workshop and this to be an ongoing activity		<p>The number of criminal prosecutions</p> <p>Updates to be provided to the Police National Computer</p> <p>Effective use of conditional bail</p> <p>Hotspot details</p> <p>Sexual harm prevention orders, closure notices on premises used for CSE</p> <p>Civil Orders</p>	