

STRATEGIC FRAMEWORK FOR AN EFFECTIVE MULTI-AGENCY RESPONSE TO EXPLOITATION IN THE WEST MIDLANDS METROPOLITAN REGION

Purpose

This Framework has been developed to support statutory safeguarding partners (Police; Clinical Commissioning Group; Local Authority) in their work to develop a robust local response to exploitation. It seeks to set out the key ingredients underpinning a whole system strategic and operational partnership approach. Exploitation of children, young people and adults is a significant issue across the country and it is important that across the West Midlands Metropolitan Region and in each of our local authority areas, we are confident that there are effective systems, processes and practices in place to both prevent and respond to it.

Background

In 2015, the Preventing Violence Against Vulnerable People Programme commissioned the development of a West Midlands Strategic Child Sexual Exploitation (CSE) Framework. This was introduced in order to drive good practice and consistency in the way local authorities, police, health and other organisations work together to prevent, identify and respond to CSE. However, over recent years, it has become more apparent that the types of exploitation children, young people and adults are at risk of have increased and changed. In response to this, local authorities and local safeguarding partners have had to flex and further develop their local systems and responses to ensure that the right levels of safeguarding and protection are provided.

In 2019 a West Midlands definition for exploitation was co-produced and agreed:-

‘An individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child, young person (under the age of 18), or adult and exploits them a) through violence or the threat of violence, and/or b) for the financial or other advantage of the perpetrator or facilitator and/or c) in exchange for something the victim needs or wants. The victim may have been exploited even if the activity appears consensual. Exploitation does not always involve physical contact, it can also occur through the use of technology.’

The Preventing Violence Against Vulnerable People Programme closed at the end of September 2019 and the regional focus on exploitation is now being co-ordinated through the West Midlands Violence Reduction Unit, in partnership with the West Midlands Police and Crime Commissioner’s Office.

Four strategic boards have been established including:

- Criminal Exploitation and Missing Board
- Modern Slavery and Human Trafficking Board
- Domestic Abuse Board
- Sexual Assault and Abuse Board

These Boards report collectively through to the West Midlands Community Safety Partnership.

Current Position

The seven metropolitan local authority areas across the West Midlands are all at different stages of their own journey to review and improve their whole system approach to exploitation, with a particular emphasis on contextual safeguarding. Contextual safeguarding is a term that is being used more and more across the country and one that tends to mean different things to different people. In order to provide the appropriate level and type of response to the harms associated with all forms of exploitation, contextual safeguarding is an approach that needs to be embedded in practice.

Contextual Safeguarding

Contextual safeguarding is an approach to understanding and responding to young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts and young people's experiences of extra-familial abuse can undermine parent-child relationships.

In response to this, children's services professionals, child protection systems and wider safeguarding partnerships need to engage with individuals and sectors who do have influence over/within extra-familial contexts and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual safeguarding therefore expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors.

Contextual safeguarding is applicable to a wide range of harms and risks where the prime cause of harm is outside of the family. These include but are not limited to:

- criminal exploitation including county lines
- sexual exploitation
- online abuse
- human trafficking
- modern slavery
- missing episodes
- risks associated with gangs
- risks associated with radicalisation
- safeguarding risks in public spaces

When a contextual safeguarding approach is adopted it requires practitioners to identify and respond to risks and vulnerabilities facing young people in a range of social environments and as such this requires a partnership response.

Child protection and safeguarding structures already routinely identify and respond to violence and abuse experienced by young people within their family or home setting however, these structures are yet to consistently engage with all social environments where children and young people spend their time.

As young people enter adolescence, they spend increasing amounts of time outside of the home and may experience violence and abuse within these public

environments. Peer groups can be more influential than family when it comes to setting standards of what is normal and peer on peer abuse can affect any child or young person.

Traditional safeguarding structures are designed to protect children and young people experiencing risk from within the home and/or from their family/carers. Local authorities and local safeguarding partnerships are increasingly recognising that the traditional child welfare lens and approach needs to change if they are going to effectively respond to extra familial risk, in particular where parents/carers and families are doing all that they can to keep their children safe.

Adult safeguarding systems have traditionally taken a more contextual approach however, the introduction of the Care Act 2014 and the safeguarding duty for those with care and support needs, sometimes results in adults who are at risk of or experiencing exploitation not receiving the support that they might need.

The [Contextual Safeguarding Network](#) provides a range of information, advice and tools to support a local contextual safeguarding approach.

Responding to Exploitation

A system that responds effectively to exploitation is one which ensures that all children, young people and adults are at the centre of the response. Whilst our systems up until recently have been equipped to respond predominantly to sexual exploitation, the various forms that exploitation can take and the range of ways perpetrators access and exploit children, young people and adults needs to be constantly reviewed and our responses need to be flexible and dynamic enough to respond.

First and foremost, all children, young people and adults must be treated as victims and all available support and protection must be put into place to ensure that they feel safe and that they know their families are safe.

Individuals can be targeted for exploitation face to face or online through social media and other platforms. Criminal groups will use popular culture such as online music videos to contact and groom children, young people and adults.

Anybody can be at risk of exploitation, no matter their family network, socio-economic background or neighbourhood. However, certain vulnerabilities can place them at greater risk. These include growing up in poverty, poor living conditions, insecure immigration status, homelessness, having learning difficulties, poor mental health, substance misuse, domestic abuse, isolation/loneliness, exclusion from school or being a child in care.

Although older adolescents are more likely to be recorded, there is evidence that children as young as seven are being targeted and many younger children are not recognised by professionals and therefore the opportunity to protect them is missed.

Adults who are being exploited may not be readily identified and supported through adult safeguarding systems if they do not have care and support needs. However,

the wellbeing principle within the Care Act 2014 applies equally to those who do not have eligible needs but come into contact with the system in some other way. This may be as a victim of modern slavery or being open to mental health as a result of trauma. There is a compelling need for an accessible offer of support for young people making the transition to adulthood and for adults referred who have complex needs and underlying issues associated with trauma.

In addition, the Care Act guidance also requires professionals to ensure that decisions take account of the individual's circumstances, rather than basing decisions only on their age or appearance, any condition they have, or any aspect of their behaviour. Whilst this principle is important in avoiding overzealous intervention, it is equally important in ensuring that needs and vulnerabilities are recognised amongst young people who might be assumed to be ineligible for support. The Care Act guidance emphasises the importance of preventing or delaying the development of needs for care and support and the importance of reducing needs that already exist. This principle can be applied to those young people and vulnerable adults whose experiences and trauma mean they may need support to live safely, without them having formally defined care and support needs.

There are many signs to suggest someone is being exploited. One indicator could be if a young person is going missing from home or care. Children in care go missing more frequently and are more likely to be found outside of the boundaries of their home local authority.

You might become aware that an adult is at risk of harm when you see or hear something; they tell you about abuse or exploitation; a friend, family member or somebody tells you something that causes you concern; you notice injuries or physical signs that cause you concern; or you notice the victim or abuser behaving in a way that alerts something may be wrong.

Gender, age, ethnicity and background can all affect the way professionals respond to individuals who have been or are at risk of being exploited. Some may be recognised as victims whilst others are not.

Individuals who are at risk of, or who are being exploited, require strengths-based, relationship-driven approaches. There are also key moments when individual agencies have the opportunity to hear the victim's voice, this might include in a school environment where the individual feels safe; whilst in custody awaiting interview; during a return home interview or when being taken home after being found out of area; in a safe and well check; during casework appointments; or in a GP practice. Ofsted carried out an analysis of 67 serious case reviews in 2010 to see what lessons could be learned about listening to what children had to say about their experiences in assessments and found the voice of the child is often overlooked.

To create a whole system approach to exploitation, we need to ensure that local communities, businesses and professionals in the voluntary and public sectors have a good understanding and knowledge of what exploitation is; the signs to look out for; what to do when they see them; and how they can play their part in preventing and reducing it. We need also to ensure that there is appropriate and safe support

that allows individuals to exit, particularly for adults who are non-British, ensuring that they have access to emergency accommodation and support that allows them to exit safely.

National Referral Mechanism

The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support. Local areas should have clear pathways in place to ensure individuals who have been referred into the NRM process, have sufficient support whilst the outcome of the referral has been agreed. Whilst there is currently no statutory provision for pre-NRM support, ECHR case law makes it clear that local authorities have a statutory duty to ensure safety from re-trafficking (under Article 4), therefore pre-NRM support is important to minimise local authorities and police being vulnerable to legal challenges if they do not have robust pathways that engage their positive obligations to identify and support potential trafficked persons.

Modern slavery is a complex crime and can take many forms including sexual exploitation, forced labour, criminal exploitation, domestic servitude, organ harvesting and human trafficking. Human trafficking is the recruitment, movement or receipt of a person by deception or coercion into a situation of exploitation. may involve multiple forms of exploitation.

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. Professionals working with individuals at risk of or being exploited should ensure an NRM referral is made either directly, or if the professional is not a First Responder, a referral should be made to the Local Authority's Social Care Front Door, who should lead on the NRM process. Professionals have an obligation to identify and provide support to potential victims and this includes exploring the NRM and gaining informed consent prior to making a referral or completing a Duty to Notify if consent is not gained. This [guidance](#) explains how to complete the referral form and other useful information about the NRM process.

In addition, the West Midlands OPCC has funded the production of a multi lingual explanatory [leaflet](#) for services working with adult victims which explains in detail, the National Referral Mechanism (NRM) for use by First Responders for survivors of Modern Slavery at the point of identification in the West Midlands. It includes realistic and accurate information from professionals about the process a survivor could expect if they were to consent to an NRM referral and the potential outcomes and opportunities if they decided not to consent to an NRM referral. The leaflet is to be read by survivors in their own time when safe to do so to ensure they fully consent to the NRM process and understand what their options are.

The West Midlands OPCC has also provided funding to support the development of a case conference style approach to multi-agency working for consenting adult victims of slavery and trafficking. The Slavery Adult Safeguarding Case Conference seeks to improve the immediate safeguarding provision to victims, with referrals predominantly from West Midlands Police and associated local authority First Responders.

The aim is to provide a service which offers safety for the victim whilst providing a platform for them to make informed decisions as to their next steps. It will also assist law enforcement in engaging with a victim in a more conducive manner, in order to potentially improve intelligence retrieval and criminal justice outcomes.

Key Ingredients to Developing a Whole System Approach to Exploitation

Effective Governance and Leadership

Senior, strategic understanding of the local extent and impact of exploitation and individual and collective commitment to ensuring the local response is robust, is critical to the development of a whole system approach.

In local areas, exploitation will be a priority across a number of strategic partnerships. The Community Safety Partnership will have identified it as a priority in the Community Safety Strategic Assessment; the Health and Wellbeing Board should have made links to vulnerability and exploitation through the Joint Strategic Needs Assessment; and the multi-agency safeguarding arrangements for children and adults may have identified it as a key priority in their plans. Whilst it is positive that exploitation has been recognised as a priority across these strategic partnerships, it is important to identify where the ownership and leadership is located and where overall responses will be developed, monitored and evaluated.

An Exploitation Strategic Group which brings together senior officers from the Local Authority, Police, Probation, Health Community, Education, Housing and other relevant statutory and voluntary sector agencies can provide leadership and strategic commitment. The role of a strategic group will be to:

- Ensure that safeguarding responses and procedures are effective in protecting children, young people and adults at risk of or experiencing exploitation.
- Ensure that effective multi-agency and single agency training programmes are available to equip all professionals with the knowledge and skills that they need in their role to prevent, identify and respond to exploitation.
- Drive a commitment to a [trauma informed approach](#) and in particular, a commitment to see all children, young people and adults as victims first and foremost.
- Encourage a preventative approach to reducing risks associated with exploitation by influencing the social, economic and environmental factors associated with it.
- Identify and monitor vulnerable locations, building resilience within communities and across a range of public, private and voluntary sector services to increase guardianship in places perceived as unsafe.
- Through communications and training, create communities who are hostile to abuse thereby increasing protective factors in unsafe spaces.
- Ensure organisational policies and practices recognise the risks and signs associated with exploitation as early as possible and know what action to take to respond effectively.
- Disrupt perpetrators and bring them to justice using all available tools, powers and legislation.

- Ensure that there is a comprehensive local understanding of exploitation, collecting data and intelligence which drives both prevention and safeguarding activity.
- Ensure that local services are in place to deliver appropriate support to children, young people and adults at risk of or experiencing exploitation.

Prevention

The West Midlands Violence Reduction Unit is seeking to drive a public health approach to the prevention and reduction of violence. This focuses on addressing the underlying risk factors that contribute to violence and exploitation. There is a range of activity that can be considered in order to improve both regional and local preventative approaches to exploitation

Much primary prevention activity requires large scale action and will require the buy in of a range of partners. Such activity to address risk factors for exploitation and support in building protective factors against victimisation and perpetration, can include:

- Quality delivery of PHSE/RSE in schools (secondary AND primary) which includes strong input on healthy relationships and explores the themes around equality
- Education programmes for all schools and colleges around safe and healthy relationships, exploitation awareness, etc.
 - The [VRU Education Toolkit](#) contains advice on building a school which is supportive, helps build resilience in its pupils and supports inclusion through a trauma informed environment
 - Good programmes equip young people to understand the range of risk factors for violence and abuse and to understand the issues and can be embedded within school life. One example is [MVP](#) (Mentors in Violence Prevention), which the VRU can support with training and implementation
- Quality delivery of drug prevention work in schools, which should include (for older children) the harms the drug industry causes
- Reducing exclusions and supporting inclusion in schools
- Equipping children, young people and carers for online safety. Resources are available, but their value needs to be promoted as something for everyone so that we can all help safeguard each other
- Ensuring ALL children have access to positive activities with positive adults to connect with, whether [sports](#), interest clubs, cadets etc.

Earlier Detection

- Awareness raising of the signs and indicators of exploitation and the impact of trauma on behaviours, aimed at: parents & carers; the wider community to build protective factors in potential unsafe spaces; education establishments; all professionals who work directly with young people/adults and/or have a community based role; young people and adults who can potentially provide support to peers.
 - Consider how to encourage widespread participation and how to overcome the thinking ‘this isn’t an issue for us’

- Promotion of a [trauma informed](#) workforce across safeguarding partnerships, with staff fully understanding the impact of adverse childhood experiences and always seeking to understand the reason behind negative behaviours.
- Targeted work with siblings of young people being identified as exploited/at risk of exploitation.
- Targeted work with young people at risk of exclusion, this may include one to one mentors; sports and positive activities; work to improve self-esteem and resilience; etc .
- Targeted work with young people missing from home and care and missing from education.
- Training of:
 - Exploitation champions across multi-agency safeguarding partnerships. Taxi and private hire driver training – in line with recently published [guidance](#)
 - All housing staff who work on estates and regularly engage with vulnerable families in their home.
 - Wider community - for security staff, park wardens, sports club staff, property management, hotel chains/staff.
- Diversionary & intervention prevention activities.
- Youth work street teams - positive disruption activity.
- Youth work street teams and neighbourhood police, actively visiting businesses in hotspot locations to ensure that they understand the dynamics of adolescence and how they can identify exploitation and offer support where appropriate.
- A range of parenting support including bespoke exploitation course for parents to come together, learn and support each other.
- Joint visits by police and Local Authority to low level concerns.

Intervention

Across the West Midlands there are different approaches to responding to exploitation, some of which are more advanced than others. Key to these approaches are the following factors:-

- A senior, strategic, multi-agency commitment to responding to exploitation.
- A clear strategy and action plan which sets out how this will be undertaken.
- A trauma informed workforce who understand and can positively respond to exploitation.
- A multi-agency exploitation hub, working alongside children and adult services front door, to provide input and expertise on levels of risk and leading on strategic and operational responses.
- A screening tool for professionals to undertake an initial assessment of risk which considers a broad spectrum of exploitative behaviours and focuses on both inter and extra familial risks.
- Clear pathways and processes where risks are identified.
- Robust multi-agency risk management and safety planning processes to ensure the child/young person or adult have access to the right level of support and care.

- Collection and analysis of data to understand the extent and impact of exploitation and this is used to inform local threshold decisions, risk assessments, safety planning and disruption activity.

In order to test local responses, agencies might want to consider the following questions:

- Are professionals who may come into contact with children, young people and adults equipped with the relevant training to be able to identify and respond to all forms of exploitation?
- Do they know what to do if they see signs including how to make a referral to the National Referral Mechanism, referrals to children's services, adult social care etc.?
- Is your policy clear regarding consent and capacity?
- Is there a clear process for information sharing with local partners?
- Is there a good understanding of the difference between information and intelligence?
- Is there a clear process for alerting other local authorities and police forces when a child or adult of concern moves between areas?
- Do you ensure that the way you deal with victims does not increase risk to them or their family, ie. loss of items from a child such as drugs/money that could cause debt and increase risk?
- Is there a clear process for individuals to screen for exploitation and understand levels of risk?
- Is there a clear pathway once referrals are received and a robust approach to understanding risk/application of threshold? This should include practical support that would allow someone to exit effectively, including emergency accommodation provision, casework support, advocacy and legal advice.
- Are there effective multi-agency arrangements in place to respond to individuals who are at risk of or being exploited to ensure that they have access to the right support at the right time?
- Is there robust gathering of information and intelligence to continually understand exploitation across an area and regular review to drive and target activity?
- Are all relevant professionals aware of the local safeguarding arrangements around exploitation, trafficking and missing?
- Do you ensure that front line officers' responses to situations do not become normalised to the type of harm that individuals involved in exploitation are at risk from and ensure they are treated first and foremost as victims?
- Is there a robust quality assurance process in place to ensure that all agencies are identifying and effectively responding to exploitation?

The child protection framework currently provides the statutory process for dealing with individuals at risk of significant harm however, we know that this predominantly focuses on keeping children safe from intra familial harm. The Care Act 2014 provides the safeguarding framework for adults and particularly focuses on those with care and support needs. Adults at risk of or experiencing exploitation may not have care and support needs, therefore arrangements need to be made to ensure that they are still receiving the right level of protection and support. This could

include commissioning services to work in the space immediately post-exploitation or with communities who are more vulnerable to exploitation such as homeless, NRPF, insecure immigration status, etc. Local areas are currently exploring other case management models which incorporate a contextual safeguarding response to ensure that vulnerable children, young people and adults are protected from extra familial risk.

Parental/carer engagement is nearly always a protective factor however, parents/carers and extended family members need support to help them manage risk outside of the family home. When parents are active in safety planning and implementation there is a greater chance of protecting the child however, there should not be an over reliance placed upon them. It is important to support the family around being aware of the risks with social media and how to manage and have conversations around safe social media use; and encourage them to confidently report missing episodes and understand the risks associated with their child going missing.

Information Sharing - There needs to be a robust local information sharing protocol to ensure that information that is relevant, proportionate and necessary to identify and respond to children, young people and adults at risk of or experiencing exploitation is systematically shared.

Partnerships need to consider a broader set of intelligence/information sources such as school, children and adult social care, health, probation, police and third sector agencies. Individuals should know the difference between information and intelligence. Police should support agencies to understand the difference, how to share it and how this can increase chances of disruption.

Robust Training and Workforce Development Programme - Workforce development and training is critical to ensuring that professionals across sectors and organisations have the right level of skills and confidence to understand exploitation and know how to identify and respond to it. Safeguarding partnerships should have a comprehensive workforce development framework which ensures a range of training is available, including trauma informed approaches.

Quality Assurance - Understanding the impact of our response to exploitation is important to driving improvement in practice and a key part of any multi-agency safeguarding quality assurance framework. Regular reviews should be built in which involve both quantitative and qualitative understanding of individuals experiencing exploitation and how safeguarding partners are responding to it. The outcome of each review process should lead to some service improvement activity. This work should take place at least quarterly and more regularly if there is evidence of poor practice or individuals who are not getting an appropriate safeguarding response.

Summary

In summary, an effective system which prevents and responds to exploitation:

- Seeks to prevent and disrupt exploitation through awareness raising, trauma informed approaches, building resilience, targeting perpetrators/locations and through the provision of education and diversionary activities.

- Recognises and identifies individuals at risk of or experiencing exploitation and ensures they are safeguarded, including family members and carers.
- Ensures multi-agency working and effective information sharing is in place.
- Utilises moments to hear the victim's voice and ensures an appropriate response.
- Ensures the victim is given support through trusted relationships.
- Utilises disruption opportunities and targeting of perpetrators.
- Ensures effective responses to critical moments which are times when a decisive response can make a difference to an individual's long-term outcome.
- Challenges bias (unconscious or otherwise) amongst professionals.
- Ensures central co-ordination of all information and intelligence relating to exploitation and the commitment to use this to inform strategic and operational policy, planning and practice
- Includes a multi-agency team which brings key professionals together to regularly review and assess exploitation referrals, trends, patterns and seeks to disrupt offending behaviour
- A safeguarding threshold document which identifies extra-familial risks and enables professionals to understand what to look for.
- Includes an exploitation screening tool that enables professionals to identify level of risk associated with all forms of exploitation both inside and outside the home.
- Has clear pathways for exploitation referrals, assessment and case management.
- Ensures the triage process for social care referrals considers a range of information and intelligence to inform risk-based decisions
- Includes Strategy meetings (Section 47) and Section 42 enquiries which include a broader and different set of professionals who understand exploitation and associated responses
- Has access to support and expertise/advice to all professionals who are working with individuals who are vulnerable to exploitation
- Access to services who can provide targeted interventions to support particular harmful behaviour.