

Bolton Council

**Bolton Complex Safeguarding & Youth
Justice Service (CSYJS)**

**Complex Safeguarding
Operational Guidance**



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Introduction

1. Complex Safeguarding is an approach and term used to describe a **different way of working** with children and families to address **non-traditional safeguarding issues**. It articulates the recognition that the current child protection system, legislation and practice does not adequately address the **extra-familial harm and risk** facing many young people. Complex safeguarding is specifically focused on keeping children and young people safe from any form of exploitation.
2. Complex Safeguarding is included within the wider concept of **contextual safeguarding** which recognises that as young people grow up and become more **independent of their families**, the **risks** that they face **change**. This can include and be influenced through relationships formed in their neighbourhoods, schools and online and can feature violence and abuse. Contextual safeguarding offers an approach for working with contexts and communities by understanding, and responding to, young people's experiences of significant harm beyond their families. Parents and carers often feel they have little influence over these contexts, and young people's experiences of extra-familial abuse can impact parent-child relationships. Harmful situations that contextual safeguarding would aim to protect young people from include:
 - Violence of any kind
 - Gangs / knife crime
 - Peer on peer and relationship abuse
 - Radicalisation
 - Missing from home / care
3. Contextual safeguarding, of which complex safeguarding is one aspect (exploitation) therefore expands the objectives of child protection systems in recognising that young people are vulnerable to abuse in a range of social contexts, and therefore requires an approach that engages with the extra familial dynamics of risk in adolescence. Alongside traditional safeguarding, complex safeguarding responsibilities are overseen by the multi-agency Safeguarding Partnership made up of key statutory partners specifically police, health, and the local authority. It is imperative that legislative, policy and practice frameworks incorporate extra familial contexts into traditional child protection and safeguarding frameworks, recognising that contextual work has historically been located within community safety and crime prevention, and therefore views young people through a welfare lens rather than a criminal one. As part of the Greater Manchester Partnership (GM), the team aims to meet the collective definition and goals summarised in the GM mission statement (in the process of being updated) supported by the GM Complex Safeguarding Hub and Operation Challenger.
4. Bolton's Complex Safeguarding Team (CST) operates as part of the wider Complex Safeguarding & Youth Justice Service and sits within the authorities Children Social Care & Early Help Services department. The team specifically assists in the safeguarding and investigation of concerns surrounding CSE, CCE & Modern Slavery. This work is identified through several channels:

- referrals into Bolton's Integrated Front Door (IFD) which identify exploitation concerns.
 - cases already open to Children Social Care either as a Child in Need (CIN), on a Child Protection (CP) Plan or is a Looked after Child (LAC) or Care leaver where exploitation concerns emerge or are identified.
 - Following consultations between professionals and the EXIT team or through GMP receiving intelligence of concerns. (Subsequently becoming open to children social care as above).
5. The CST will apply a threshold as to which cases they will accept; this will consider the seriousness and complexity of the case. Regardless though, the CST will offer support / advice to partners and colleagues to assist in identifying concerns, supporting children and families, and providing resources for professionals to use. Professionals within the EXIT team will co-work all child exploitation cases with statutory social workers who remain overall case responsibility. The statutory social worker remains responsible for safeguarding visits, assessments under S.17 and S.47 and ensuring any strategy meetings are convened. The allocated CST worker will complete a comprehensive specialist assessment tool (WISE) and aim to develop a trusted relationship with the child using a strength-based approach. The functions of Bolton's Complex Safeguarding Team are:
- To support children and their parent/carers where exploitation is known or strongly suspected to increase the stability in their lives.
 - To disrupt, catch and convict the perpetrators of exploitation, utilising a contextual safeguarding approach to disrupt people, places, and spaces of concern to increase the safety of children.
 - To promote the early identification and prevention of exploitation across the borough by the provision of information and advice, training, and awareness raising events.
 - To work in a coordinated way with GMP and the children's professional network under Bolton's Safeguarding Children's Partnership.

Extra familial harm and Child Exploitation

6. Extra familial harm is defined as risks to the welfare of children that arise within the community or peer group, including sexual and criminal exploitation, and is a type of **abuse**. It usually occurs outside the child's home when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into behaviours that are harmful. It can take the form of sexual abuse and/or forced criminal activity. Children may have been exploited even if the activity appears consensual, and it is not uncommon for victims to feel unable to disclose what has occurred. Child exploitation does not always involve physical contact; it can also occur through the use of technology.
7. The Independent Inquiry into Child Sex Abuse published in 2022 recommended that The Department for Education publish an updated version of its guidance on child sexual exploitation to specify that a core element is that a child was controlled, coerced, manipulated, or deceived into sexual activity. It also recommended inclusion of the role of the internet in the perpetration of child sexual exploitation.
8. The following terms may also be used:

- Modern Day Slavery – this is a complex crime and consists of multiple forms of exploitation including:
 - Human Trafficking – the action of recruitment, transportation, transfer, harbouring or receipt of a child which can include either domestic or cross-border movement for the purpose of exploitation.
 - Slavery, servitude and forced or compulsory labour – the action of exploiting a child to provide a service, for example, begging, sexual services, manual labour, domestic service, selling drugs.
 - County Lines – a form of criminal exploitation where children are used to deal drugs. The 'line' refers to mobile phones used to control the child delivering the drugs, often to towns outside of their own.
 - Cuckooing – Also known as home invasion where a criminal gang will secure control of the property of a vulnerable individual.

Aims

9. In delivering services, CST aim to respond in line with partnership expectations that:
- We ensure children are protected, parent/carers are supported, perpetrators are prosecuted, and the borough of Bolton is a safe place for all.
 - We respond using a contextual safeguarding approach, understanding, and disrupting the source of the harm, beyond the child's home.
 - We work in partnership with GMP and our local Safeguarding Children and Community Safety Partnership's (CSP's)
 - We recognise any child may be at risk from exploitation and we put children at the centre of all we do.
 - We work in ways that promote equality of opportunity and build stable, trusting relationships.
 - We listen to what children tell us, treating them with respect and kindness.
 - We know children cannot consent to being exploited; exploitation is not a 'lifestyle choice', it is child abuse.
 - We understand culture and diversity may impact upon children and will respond to each child's unique circumstances.
 - We will not give up on children or stop helping them because 'they' don't engage; we will consider the reasons we aren't connecting with them; we are persistent in our work.
 - We recognise parents and carers as safeguarding partners and take a whole family approach to offer support to promote strengths.
 - We trust our colleagues, managers, and partners to provide effective support and offer constructive challenge when needed.

Strategic Governance

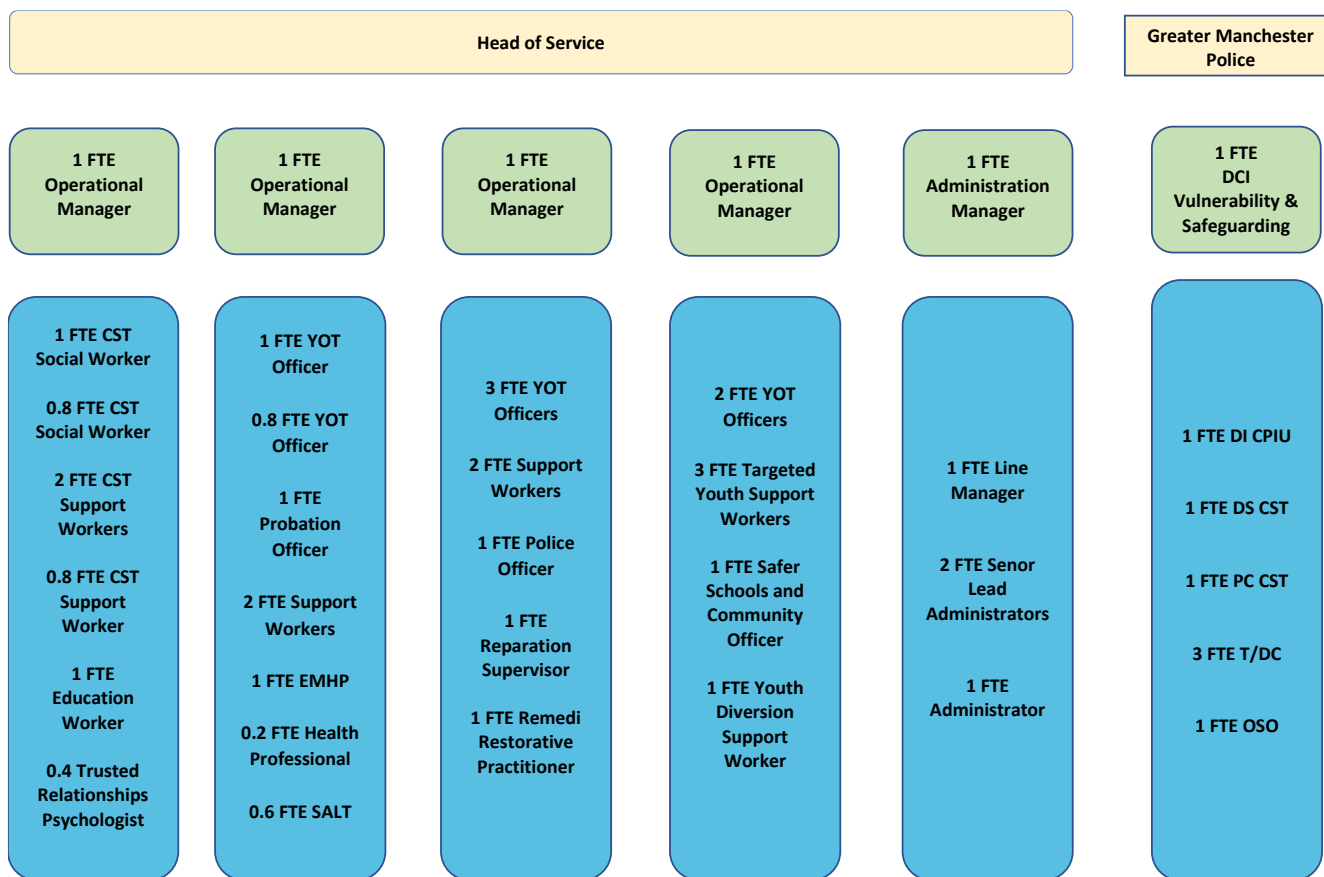
10. Bolton's Complex Safeguarding Team sits within the Complex Safeguarding and Youth Justice Service which is located within Bolton's Children's Social Care and Early Help Directorate.
11. The strategic governance of the team is led by the Director of Children's Services and Assistant Director for Children's Social Care and Early Help, the Head of Service for the CSYJS and GMP's K Division Detective Superintendent and Detective Chief Inspector for Safeguarding and Vulnerabilities, along with input from strategic leaders for Community Safety, Safeguarding Children's Partnership, and health. These individuals sit on the CSYJS Management Board which steers the strategic direction of the team locally.
12. The HOS for CSYJS attends the GM Complex Safeguarding Steering Group, ensuring a regional presence. Greater Manchester's Complex Safeguarding Hub offers support at strategic and operational levels around the development of practice and quality of service delivery.

Operational Management

13. The operational management of the team is supported by the Complex Safeguarding Team Operational Manager, and Complex Safeguarding Police Team Detective Inspector and Sergeant.
14. These individuals regularly attend the CSYJS Management Board, GM Steering Group and Operations Group and hold regular team meetings & briefings.
15. The Complex Safeguarding Team Manager offers monthly 1 to 1 supervision sessions to all CSC team members.

Complex Safeguarding Team Structure

16. The team in Bolton are co-located with GMP at Scholey Street Police Station, Bolton and comprises of Operational Manager, 2 Social Workers, 3 Support Workers, Trusted Relationships Psychologist, ETE Officer, Business Support Assistant and a linked Specialist Adolescent Nurse. We also have links to CSC, Youth Justice Service, MFH Co-ordinator, 360 and CAMHS.



Consultation and Awareness Raising

17. Our “Extra Familial Abuse” information sheet has been made available to staff within Bolton’s Children’s Social Care and Early Help teams, including the Integrated Front Door (IFD), as well as services supporting children across Bolton to assist with the identification of exploitation, and ensure everyone is confident in their response.



Recognising Extra Familial Abuse.docx

18. Complex Safeguarding staff operate a daily duty system where practitioners can request a consultation if they are concerned a child is being exploited. These can be requested via an email to exitteam@bolton.gov.uk Our duty worker may also attend strategy meetings when an exploitation concern has been identified. To enable our CST Duty to determine an appropriate response, it is key that the professional requesting the consultation identifies and clearly communicates the signs that indicate exploitation is taking place, remembering that exploitation may be identified from cumulative information or by a single event. All consultation and referral discussions will be logged on LCS by the CST Duty Worker.
19. Where this does not lead to a referral to CST the professional will be provided with advice and resources. Where a referral to CST is agreed this will be completed by the child’s social worker and reviewed by the Operational Manager.



Complex Safeguarding Referrals

20. A small number of cases may require urgent crisis intervention, in this instance the social worker can make direct representation to the CST Operational Manager. Additionally, police representatives within the MASS or CPIU should also make direct approaches to the CST Police Team to facilitate advice or attendance at strategy meetings.
21. If there is a concern that a child not open to CSC is being exploited the individual reporting the concern must access Bolton Council's website '[Worried about a Child?](#)' page and follow the instructions to refer to CSC. If they are concerned that the child is at immediate risk of harm, they should phone the police. They may email our duty team for advice and guidance, but we cannot make referrals to CSC or submit intel on behalf of other agencies.
22. The CST also offer awareness raising sessions to partners, new staff and students and contribute to our safeguarding children's partnership multi agency training on extra familial harm.
23. During GMP and National Weeks of Action we work collaboratively with partners to intensify awareness raising and engage with communities across the borough.

Thresholds and Referrals

24. The Complex Safeguarding Team focuses on those most in need. This is on the basis that all services have a responsibility to identify and mitigate risk for the children they are working with. For those not meeting the threshold for CST, services should use their own resources and existing frameworks to identify need, plan and provide interventions in order to reduce the vulnerability and divert at the earliest opportunity.
25. The threshold for acceptance onto caseload is fulfilled where it can be seen from referrer's information that there is evidence exploitation is occurring, or strong professional suspicion, alongside unmet and complex need. The CST are only able to accept referrals for children open to CSC.
26. The decision to accept or decline referrals will be made jointly by GMP and the CST Operational Manager but ultimate decision-making responsibility will lie with the CST manager. There is a resolution process whereby a consult with the HOS for CSYJS can be requested if required.
27. In rare cases we may accept 'prevention' cases but only in circumstances where it is felt that we are the best agency to do this (for example, siblings in families we are already working with) This will be dependent on caseload numbers at the time and at the discretion of the CST Operational Manager.

Service Delivery

28. Bolton CST are based with GMP at Scholey Street Police Station, Bolton to aid joint working, build relationships between the police, children and families, and ensure focus is on the disruption of the source of harm to the child.
29. We utilise the Greater Manchester WISE (Working to Increase Safety in Exploitation) model to identify need, the source of harm, and to outline the plan to address these. WISE is a strength-based approach and takes a two-pronged approach to protecting children, by

increasing the stability and safety in their lives. The model was developed through the GM Complex Safeguarding Hub based on evidence around what works to safeguard children at risk of exploitation, utilising the views of children themselves, and experience of professionals working in the field.



30. Upon receipt of a new referral the CST will aim within 5 working days to review the information contained and if accepted allocate the case.
31. Once a CST practitioner receives a new case the following actions will be completed within 10 working days:
 - Arrange an introductory visit to the child and their parent/carer.
 - Convene a CST Planning Meeting to gather information and agree roles.
 - Make an NRM referral.
 - GMP will allocate an IOC.
32. Within approximately 8 weeks the CST Practitioner will:
 - Complete the WISE document.
 - Child will be heard in CEAM (Child Exploitation Action Meeting)
 - Perpetrators and places/spaces of concern will be discussed at CEDAM (Child Exploitation Disruption Action Meeting)
33. As support and intervention progresses the plan will be reviewed via core social work review meetings, for example, CAMs, core groups etc. It will remain the responsibility of the child's core social worker or their manager to convene and chair these meetings. Where a strategy meeting is required, this will also be the responsibility of the core social work team.

Increasing Stability

34. Staff from CST will co-work all cases with a social worker from one of the teams within Children's Social Care and will play an active role within the multi-agency team working to protect the child. We aim to offer a supplemental element to practice.
35. In recognition of evidence around the need for children to forge trusted relationships and be connected to their communities we will work in a strength based and relational manner. This may include:
 - Increasing and improving positive connections in the child's life.
 - Enabling access to suitable education.
 - Offering opportunities to participate in diversionary activities.
 - Improving parent/carer well-being.
 - Improving child's health, addressing areas such as emotional mental health, substance use, speech & language support etc.

- Delivering interventions such as life story work, knife crime, consent etc

Increasing Safety

36. Actions will also be taken to increase the safety in the child's life and may include:
- Safety planning with parents and carers, overseeing of phone usage/internet access etc.
 - Mapping of people, places and peer groups that do not support safety.
 - Disruption of the identified source of harm including places and spaces where exploitation occurs.
 - Police investigation and conviction of perpetrators

Child Exploitation Action Meeting (CEAM)

37. Bolton operates a monthly Child Exploitation Action Meeting (CEAM) chaired by the HOS for CSYJS. The function of this meeting is outlined in the terms of reference.



Child Exploitation
Action Meeting TOR

The child's social worker and their CST Practitioner attend to provide an update on progress made and highlight any barriers to the delivery of the plan to keep them safe from exploitation. The meeting is attended by the representatives of the partners below. They hold a senior position within their organisations and can assist in the delivery of support to children being exploited.

- 0 – 19 Health Service
- 360 Substance Misuse Service
- CAMHS
- Youth Justice
- GMP
- MFH Co-ordinator
- Safeguarding in Education

Child Exploitation Disruption Action Meeting (CEDAM)

38. Bolton CST also convenes a monthly child exploitation disruption action meeting (CEDAM)



CEDAM TOR V1
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It is chaired by the DCI for Vulnerabilities and Safeguarding and aims to identify and agree disruption activity focussed upon people, places, and spaces of concern. In this forum we

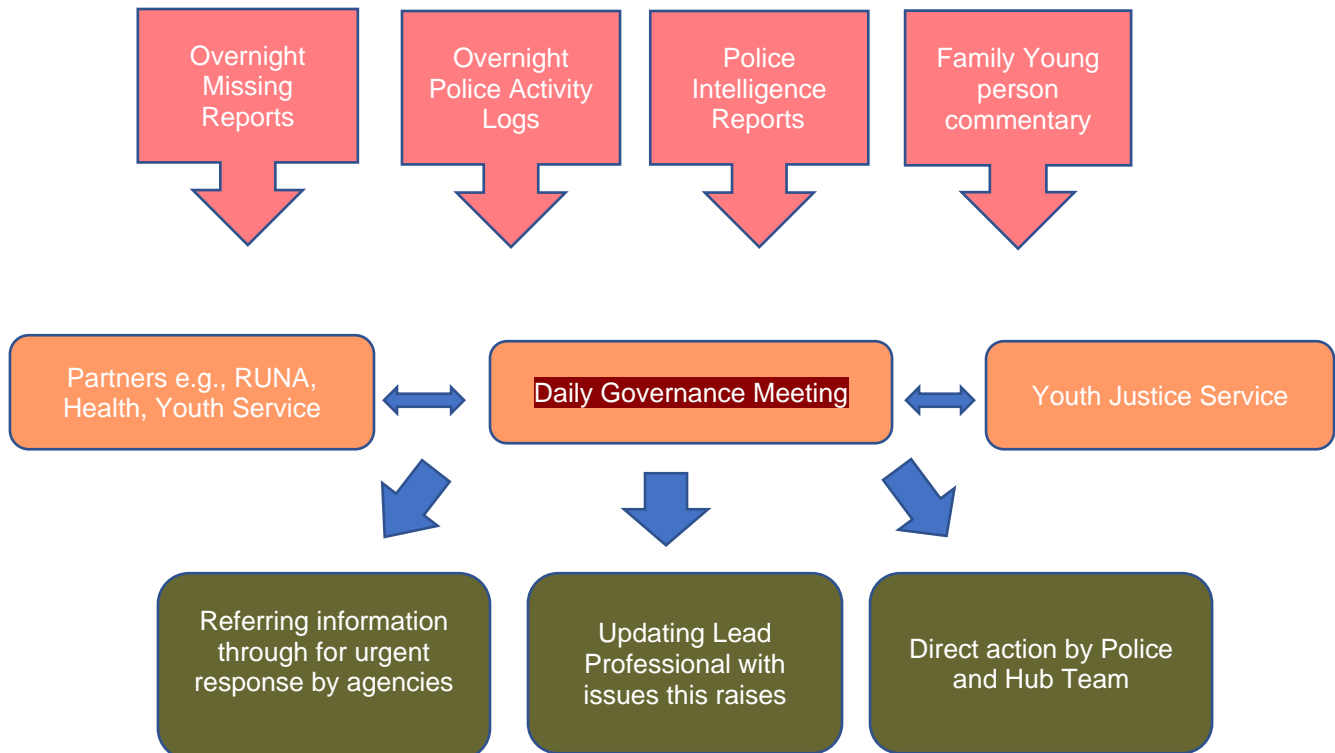
use the [MOJ Child Exploitation Tool Kit](#) which outlines the full range of options available for disruption. CEDAM is supported by the following partners:

- GMP
- CST
- Community Safety
- Regulatory Services
- Youth Service
- Housing (virtual link)

Daily Governance Meeting (DGM)

39. This meeting, as the name suggests, is held daily and scans intelligence regarding vulnerable young people from police sources and incidents recorded by other agencies. This daily research supports the tracking of young people, the provision of live intelligence about the actions of perpetrators and places of concern. It contributes to the daily assessment of harm. Response is in real time and via a daily morning meeting actions are agreed to mitigate new threats and allow for the exploration of approaches to disrupt or intervene. Information is shared by and with relevant agencies such as health, RUNA, and lead professionals. Recommended actions are discussed and disseminated. This process also enables a preventative approach to exploitation by highlighting the early signs of potential exploitation.

Daily Governance Meeting



40. This meeting is also used to plan other daily tasks, such as attendance at strategy meetings, joint visits, new allocations, case closures and NRM referrals.

Intelligence

41. Bolton's Complex Safeguarding Team aims to use intelligence to maximum benefit in the protection of children. Where this information is shared and effectively utilised, it can provide a picture of exploitative activity in the community and is key to mapping patterns relating to people and places of concern and aiding the completion of good quality assessments and plans.
42. The Complex Safeguarding Team deliver awareness raising input for partners around using the partnership submission form to share intelligence with the police.
43. Intelligence around exploitation should be submitted directly to the police via completing the partnership intelligence form and emailing it to – FIB@gmp.police.uk



Partner Agency
Intelligence Form - \

National Referral Mechanism (NRM)

44. Specified public authorities, such as Bolton Council, are required to notify the Home Office about any potential victims of modern slavery they encounter. These authorities are classed as 'first responders' and have a statutory duty to make a referral to the National Referral Mechanism where there is 'professional suspicion' of Modern-Day Slavery (see above for definition). Referral to NRM enables the following:
 - Official recognition as the victim of modern-day slavery – ensures children are recognised as victims rather than willing participants.
 - Can lead to more appropriate service provision supporting effective safeguarding.
 - Use of Section 45 defence in court proceedings
 - Launch of a police investigation into the incident of Modern-Day Slavery.
 - Enables children who have been trafficked from overseas to be returned home.
 - Contributes to national and regional data collation around exploitation, enabling the targeted distribution of funding and services to address this.
 - Access to Barnardo's ICTG service
45. Children under the age of 18 do not have to consent to an NRM being submitted. Ideally the decision to submit an NRM will be made jointly between partners involved, however where agencies are unable to agree the referral should be submitted with those not in support having the opportunity to submit their evidence to the NCA to explain they do not believe the child is a victim of Modern-Day Slavery.

[National referral mechanism guidance: adult \(England and Wales\) - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

[Interim Guidance for Independent Child Trafficking Guardians \(accessible version\) - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

This section has no associated Explanatory Notes