



**Suffolk Safeguarding
Children Board**

Managing Organised and Complex Abuse

Policy Version History

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Scope of this Policy

This policy sets out arrangements for agencies to investigate allegations of complex and organised abuse and provides information about what action they should take if they suspect such abuse. All agencies, including those from the voluntary and community sector, who may be asked to contribute to complex abuse investigations, need to ensure that they follow this procedure. Registration authorities should also adhere to this procedure in cases where continuing registration of a setting may be affected by the investigation.

For further guidance see also:

Complex Child Abuse Investigations: Inter-Agency Issues, HO and DH 2002.

These procedures must be implemented in conjunction with the procedures on abuse by those working with children where appropriate.

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1. Definition

Complex and organised abuse may be defined as:

*Abuse involving **one or more abusers and a number of related or non-related abused children** and may take place in any setting. The adults concerned may be acting in concert to abuse children, sometimes acting in isolation or may be using an institutional framework or position of authority such as a teacher, coach, faith group leader or be in a celebrity position to access and recruit children for abuse.*

Such abuse can occur both as part of a network of abuse across a family or community and within institutions such as residential settings, boarding schools, in day care and in other provisions such as youth services, sports clubs, faith groups and voluntary groups. There will also be cases of children being abused via the use of electronic devices, such as mobile phones, computers, games consoles etcetera which all access the internet and in particular social networking websites.

Although in most cases of complex and organised abuse the abuser(s) is an adult, it is also possible for children/young people to be the perpetrators of such harm, with or without adult abusers.

2. Investigation

Each investigation of complex and organised abuse will be different, according to the characteristics of each situation and the scale and complexity of the investigation. All will require thorough planning, collaborative inter-agency working and a primary focus on the needs of the child victim/s involved.

The investigation of complex abuse requires specialist skills from both police and social work staff which usually involves the formation of dedicated teams of professionals and will need consideration of the needs for victims for therapeutic services. The consequent legal proceedings may add to the timescales of such investigations.

Some investigations become extremely complex because:

- of the number of locations, potential victims and perpetrators involved;
- of the timescale over which abuse is alleged to have occurred;
- in historical cases, the alleged victims are no longer living in the setting where the incidents occurred;
- the alleged perpetrators are also no longer linked to the setting or employment role.

Investigations into complex or organised abuse require appropriate management and oversight processes. There are a number of ways in which they may be put in place.

A senior Police Officer may convene a 'Gold Group' if a particular investigation merits senior oversight from a police perspective. The purpose of the Gold Group is to set the overall strategic direction of the investigation and wider situation and provide the appropriate oversight, including the allocation of resources. It is not to set the investigative strategy. Membership of the Gold Group may be extended to include partner agencies. These meetings are minuted and those minutes may be revealed to the prosecution, should criminal proceedings be undertaken.

Whilst other oversight processes may be considered, it is important to avoid duplication and/or divergence of aims or direction. Where a Gold Group is put in place this should become the vehicle for partnership oversight. Where a Gold Group is not put in place, or where a Gold Group has initially sat but is no longer required, then alternative oversight should be considered.

In these circumstances consideration will be given to establishing a specialist Investigation Management Group as well as a Strategic Management Group.

The Suffolk Complex Abuse Investigation Oversight Group may perform the role of one or both of these groups.

The factors outlined above will all need to be taken into consideration when working with a child or adult victim. When the victim is vulnerable and unable to provide a full statement careful consideration should be given to how to proceed to ensure that other children, now in contact with the alleged perpetrator, are also protected.

The confidentiality of the information relevant to any Section 47 enquiry and criminal investigation must be strictly maintained by those involved and must not be disclosed to others, including others within the agency, unless absolutely necessary.

The appointed Police Senior Investigating Officer will have responsibility for the conduct of the criminal investigation.

3. The Child

The single and most important consideration in respect of this policy is the safety and well-being of the child or children.

In reconciling the difference between the standard of evidence required for child protection purposes and the standard required for criminal proceedings, emphasis must be given to the protection of the children as the prime consideration.

The investigation and enquiries must also address the racial, religious, cultural, language, sexual orientation and gender needs of the child, together with any special needs of the child arising from illness or disability.

A victim support strategy and protocol should be established at the outset. Support will be required in pre-trial, trial and post-trial periods if the case/s proceed to court. Minimum periods for contact should be established. It is clear from experience in research about complex investigations that many victims and families feel strongly that it is important that they remain in contact with the same staff throughout the investigative process.

4. Referral

Information or a referral which may indicate complex and organised abuse, as defined in Section 1 above, may come to the attention of staff in one of a number of settings including the MASH, Early Help and Social Care teams or direct disclosure to the Police or another agency.

Where the referral is received by Social Care, the recipient should immediately refer the matter to the relevant Practice Manager in Children's Social Care and the Area Safeguarding Manager. Where appropriate, the Local Authority Designated Officer (LADO) should be informed.

The Practice Manager will determine, in consultation with their Service Manager:

- whether the criteria for complex or organised abuse set out in this policy appear to be met and there is a need for a Strategy Discussion and;
- what immediate steps need to be taken to ensure the child/children's immediate safety.

If there is any suspicion that any managers currently employed by a social care agency or a member of the police are implicated, the matter should be referred to Head of Service for Children's Social Care Fieldwork. Consideration should be given to informing the Chair of the Safeguarding Children Board or, in their absence the Vice-Chair, and a Senior Officer within the police where specific complexities and resource implications may need to be considered quickly.

Where the referral is received by the police then this will be brought to the attention of the MASH and a senior manager within the Protecting Vulnerable People Directorate.

5. The Strategy Meeting

A Strategy Meeting will be arranged to take place as a matter of urgency to assess the need for future action to be taken and whether a criminal investigation should take place.

The Strategy Meeting, chaired by a Service Manager of Children's Social Care, must take place within **one** working day of the receipt of the referral and be formally recorded. The Independent Chair of the LSCB must be notified *for information only* at this stage if it is agreed it is complex abuse.

Where it is decided that the case falls into the category of complex or organised abuse then a senior manager within the Police Protecting Vulnerable People Directorate must also be informed.

The nominated Service Manager of Children's Social Care and a Detective Sergeant or above from the police will attend the Strategy Meeting which will also involve senior staff from health, education and other agencies as required and, where necessary, must ensure coordination across local authority boundaries.

The Strategy Meeting will carefully consider and record:

- An assessment of the information known to date:
 - The children named.
 - The children who may be in current contact with possible abusers.
 - Children who were, but no longer are, in contact with possible abusers.
 - Possible victims who are now adults.
- Decide what further information is required at this stage.
- Identify who will gather the additional information and by when.
- Establish if, and to what extent, complex abuse, defined in Section 1 of this policy, has been identified.
- Undertake an initial mapping exercise to determine the scale of the investigation and possible individuals implicated as well as prepare:
 - Witnesses to be interviewed prior to the interviews of children.
 - Multiple and simultaneous interviews.
- Consider likely staffing and resource implications for any investigation to be presented to the Strategic Management Group.
- Consider any immediate protective action required.
- Consider any immediate internal and external communication requirements.

Where it is decided that the case falls into the category of complex or organised abuse then a senior manager within the Police Protecting Vulnerable People Directorate must also be informed.

Where the Strategy Discussion confirms that the investigation will relate to complex and organised abuse, consideration will then be given to ensuring the appropriate strategic oversight is put in place.

This may include a multi-agency Strategic Management Group (see Section 6) to oversee the combined response.

Where a member of staff of any agency is implicated in the investigation, his or her line manager must not be a member of the Strategic Management Group.

6. The Strategic Management Group

Where a Strategic Management Group is considered appropriate it will be led by a Service Manager in Children's Social Care and a Senior Detective from the Protecting Vulnerable People Directorate from Suffolk Constabulary. The Strategic Management Group will:

- Ensure that appropriate action is taken to ensure the immediate safety of children and young people at all stages of the investigation.
- Complete the mapping process started by the Strategy Discussion as set out in Section 5.
- Decide the terms of reference and accountability for the multi-agency investigating team, including the parameters and timescales of their enquiries/investigation.
- Bring together a team of people with the necessary training, expertise, experience and objectivity to manage and conduct the criminal investigation and/or Section 47 Enquiry on a day to day basis.
- Decide whether there is a need for an independent team to investigate the allegations, for example a voluntary agency or another LA, particularly where the alleged perpetrators are foster carers, prospective adopters or members of staff employed by a member agency of the Local Safeguarding Children Board.
- In cases of greater scale and complexity, as defined in Section 2, consider the appointment of an Investigation Management Group (IMG - see Section 7).
- Ensure that appropriate staffing and resources are deployed to the investigation including access to legal and other specialist advice, resources and information.
- Ensure that appropriate resources are available to meet the needs of the children and families or adult survivors, including any specific health issues arising from the abuse.
- Ensure the investigating team are themselves supported with personal counselling if necessary and that issues of staff safety are addressed.
- Ensure that suitable accommodation and administrative support are available for the investigation.
- Ensure that an appropriate venue is available for interviews and the interviews are conducted in accordance with *Achieving Best Evidence* Guidance.

- Liaise as necessary with the Crown Prosecution Service at an early stage before arranging services for a child in need of counselling or therapeutic help so that the help can be given in a way which is consistent with the conduct of the criminal investigation.
- Agree ownership of the communications strategy, including the handling of political and media issues, and communication as necessary with the Regulatory Authority.
- Ensure that records are kept safely and securely stored and a high level of confidentiality maintained at all times.
- Determine the frequency with which strategic meetings and reviews need to be held in order to conduct the investigation effectively.
- Ensure that actions and decisions are recorded clearly and in sufficient detail to provide a clear understanding of why they were taken.
- Consider progress at all stages - evaluate the effectiveness of the joint working, the need for additional staffing or resources and next steps.

7. The Investigation Management Group

In cases of greater complexity and scale (see Section 2), an Investigation Management Group may be appointed.

Membership of this group should include representatives from Children's Social Care, the Police, designated health professionals and the local authority's legal services, with other agencies being invited to participate as appropriate.

The tasks and functions of the Group will be subject to the terms of reference agreed by the Strategic Management Group (SMG), and will include the following:

- Ensure that appropriate action is taken to ensure the immediate safety of children and young people at all stages of the investigation.
- To provide a forum for professionals to exchange information and discuss the implementation of the agreed investigation strategy.
- To ensure a consistent strategy for interviewing victims within and outside the councils area.
- To keep the SMG informed of resources and any shortfalls.
- To ensure a consistent and appropriate inter-agency approach to support victims and their families.
- To co-ordinate the inter-agency response to families and provide consistent information.
- To ensure information is shared appropriately with other agencies not represented on the SMG or the IMG.

- To ensure clarity of roles and responsibilities for staff involved in the investigation. Investigators will have full access to all records and key information.
- To ensure that relevant intelligence is passed between agencies and to the Police Major Incident Room (MIR).

8. End of Enquiry/Investigation Meeting and Report

It is probable that an investigation will identify individuals who are suspected abusers but against whom prosecutions are not brought. If a suspected abuser is working with children in a child care position, or in the education service, evidence and information should be shared to support disciplinary proceedings and to enable, where appropriate, the referral of suspected abusers to the Disclosure and Barring Service (DBS) and the relevant regulatory bodies.

At the conclusion of the enquiry/investigation, the Strategic Management Group must evaluate the investigation and identify the lessons learned. Consideration should be given to prepare an Overview Report with recommendations and an Action Plan for the Local Safeguarding Children Board, highlighting any practices, procedures or policies which may need further attention and require either inter-agency or individual agency action plans.

Arrangements for safe and secure storage/archiving of the record of the investigation will be agreed once it is concluded.