



3 September 2013

Sent by email to: VPP@college.pnn.police.uk

Dear Sir/Madam,

**Re: The Children's Society's submission to the College of Policing's public consultation on the draft Guidance on Child Abuse and the draft Guidance on Child Sexual Exploitation**

The Children's Society is a leading national charity, providing vital help to the most vulnerable children, young people and families in our society through a range of services. We run nine projects working with children who run away or are at risk of sexual exploitation, supporting more than a thousand children every year.

We welcome this opportunity to respond to the consultation on the Draft Guidance on Child Abuse and on the draft Guidance on Child Sexual Exploitation. Our response is based on our research and direct work with young runaways, children at risk of sexual and refugee children. We are also a member of the NWG Child Sexual Exploitation Policy group and support its submission to this consultation.

**Comments on the draft Guidance on Child Abuse**

We welcome this guidance. We believe it provides quite detailed and comprehensive information that can help the police identify child abuse and conduct efficient investigations that ultimately will lead to better protection of children and young people and increased rates of convictions of perpetrators.

We also welcome that the guidance makes it clear that each allegation or suspicion of abuse needs to be investigated thoroughly and that paramount consideration for each investigation should be the welfare of the child and support for the victim of abuse. However, we believe that some sections of the guidance need further clarification.

***Runaway and missing children***

We welcome the inclusion of references to missing children and families in this guidance and the acknowledgement that going missing can be an indicator of abuse or neglect. We believe that this section also needs to raise the issue of children who may be found/picked up by the police but who have not been reported missing. Our research shows (Rees. G. (2011) Still missing 3) that many children are forced out by their families and carers and often not reported missing. When such cases come to the attention of the police they need to be considered in the same way as cases of children reported missing to the police as possible cases of abuse.

***Trafficked children***

We believe that the guidance can be strengthened in relation to trafficking. The definition of child trafficking should more accurately state that child trafficking is the recruitment and movement of children for the purpose of exploitation. It is a form of child abuse and requires a child protection response. The guidance should alert the police to different forms of child trafficking - forced labour (e.g. in restaurants, nail salons, sweat shops), domestic servitude (in the home, sometimes in what may appear to be private fostering arrangements), benefit fraud (could also look like private fostering arrangements), forced criminality (e.g. forced begging, stealing, cannabis cultivation, drug dealing), sexual exploitation (e.g. in brothels but also within other contexts such as in private fostering arrangements). It is important for the guidance to highlight that the police develop a 'child first' approach regardless of the context in which the child is discovered in (e.g. cannabis

factory, brothel, etc.), and regardless of their nationality or immigration status. If a child or young person doesn't have documents, or has documents showing them to be older, this could be sign that they have been trafficked and are at risk of further abuse and exploitation. We would recommend including references in the guidance to the child trafficking toolkit by the London Safeguarding Children Board which includes a section on indicators and a framework for assessment: <http://www.londonscb.gov.uk/trafficking/>.

### ***Sexual activity and consent***

We believe that the sections on sexual activity and sexual activity with consent are currently not written in a clear way and could be misinterpreted. We agree that it is important that cases of sexual activity between young people over the age of 13 should be approached sensitively. But the guidance should clearly explain categories of offences against children under 13, under the age of 16, and explain the vulnerability of young people aged 16 and 17 who may still be victims of abuse and exploitation. We recommend that information provided in table 2 in the draft Guidance on Child Sexual Exploitation is replicated in this guidance.

### **Draft Guidance on Child Sexual Exploitation**

We welcome this draft guidance which provides comprehensive information on risks factors, location of concerns and other relevant information.

We particularly welcome the emphasis on the importance of perceiving victims of sexual exploitation as 'troubled' rather than 'troublesome' and recognising that victims' experiences in the past, including how they were supported by different agencies, can make them reluctant to disclose exploitation or seek help.

### ***Missing as a risk factor***

We welcome the inclusion of 'going missing' among the warning signs and would recommend that it should also be included as a risk factor. Our research show that although some people run away and go missing because of sexual exploitation, many are targeted for sexual exploitation as a result of running away or going missing from home or care.

### ***Out of area care placements as a risk factor***

We would also recommend that living in care, particularly in placements out of their home area and in children's home, should be recognised as a separate risk factor. The All Party Parliamentary group inquiry we supported last year into children missing from care received evidence of children in such placements are particularly targeted by sexual predators aiming to exploit their vulnerability.

### ***Locations of concern***

The list of locations of concern should be expanded to include hotels. From our practice we know that children who are sexually exploited are sometimes exploited in hotels. The Children's Society jointly with the NWG, with contributions from a number of local safeguarding children's boards, have developed the 'Say Something if You See Something' toolkit, which contains tools and resources to raise awareness of child sexual exploitation happening in hotels. We would be happy to provide you with further information on the toolkit to reference in the guidance.

I hope you will find our submission useful. Please contact me if you require further information on any of the issues raised.

Yours faithfully,

Iryna Pona

The Children's Society

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