

Gweithio'n Gytân Ar Gyfer Plant



Working Together For Children

# South East Wales Safeguarding Children Board

## Complex Abuse Protocol

**Date first ratified by SEWSCB:**

23<sup>rd</sup> February 2016

**Developed by:**

Protocols and Procedures  
Sub-Group

**Date to be reviewed:**

23<sup>rd</sup> February 2017

## Foreword

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 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.

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.

Each investigation 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 attention to the needs of the child victim/s involved.

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

Some investigations become more complex due to the number of places and people involved, and the timescale over which abuse is alleged to have occurred. In these circumstances a specialist Investigation Management Group as well as a Strategic Management Group may be set up.

The complexity is heightened where, as in historical cases, the alleged victims are no longer living in the setting where the incidents occurred or where the alleged perpetrators are also no longer linked to the setting or employment role. These 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 on how to proceed to ensure that other children, now in contact with the alleged perpetrator, are also protected.

## What is Complex Abuse?

This Protocol is to be cross referenced to Section 4.5 of the All Wales Child Protection Procedures 2008, and supplementary guidance, and Safeguarding Children: Working Together under the Children Act 2004

1. **Complex** (organised or multiple) **abuse** may be **defined** as abuse involving one or more abusers and a number of children (related or non-related). The abusers concerned may be acting together to abuse a child or children, or may be acting in isolation. One or more of the adults involved may be using an institutional framework or position of authority to recruit children for abuse.
2. It reflects, to a greater or lesser extent, an element of organisation on the part of the adult/s involved and may involve:
  - Aspects of ritual to aid or conceal the abuse of children
  - Child sexual abuse networks where adults plan and develop social contacts with children for the purpose of gaining access to them in order to abuse them
  - Abusive images of children or abuse of children through prostitution
  - Abusive images of children obtained through coercion as a result of direct contact, third party to include use of social media
  - Abuse in residential homes, boarding schools or other institutions
  - Adult/s who seek contact with children for improper reasons through leisure or welfare organisations.
3. Complex abuse investigations will encompass not only the reporting of current abuse on children, but also the reporting of childhood abuse by adults, commonly referred to as historical abuse.
4. Cases of organised abuse are often highly complex because of the number of children involved, the very serious nature of the allegations of abuse, the need for therapeutic input and the complex and time consuming nature of any consequent legal proceedings.
5. Each investigation is different and complex abuse may occur in day care, in families and in other provisions such as schools, youth services, sports clubs and voluntary groups. The emergence of cases of children being abused by the use of Internet is a new form of complex abuse. The full extent and complexity of the abuse may only emerge during the course of the investigations. Professionals need to be mindful of this from the onset of the investigations. Due consideration should be given to the agencies that need to be involved in the investigation including cross border issues.
6. Complex abuse investigations require thorough planning and may require the formation of dedicated teams of professionals from both the police and Children's social care for the purpose of the investigation.
7. It is recognised those who commit sex offences against children often operate across geographical and operational boundaries and the procedure reflects the involvement of more than one local authority.

8. Where an allegation involves a post holder who has a specified role within these procedures, the referral must be reported to an alternative (more senior) manager.
9. In all investigations of organised abuse, it is essential that staff involved maintain a high level of confidentiality in relation to the information in their possession without jeopardising the investigation or the welfare of the children involved. The issue of the investigation requiring a more covert approach should be discussed at the onset of the investigation.
10. Subsequent information generated throughout the investigation should only be shared on a 'need to know' basis
11. The protection of any children identified as being at risk of harm remains paramount. The investigation should take into account the needs of the alleged offender. The investigation should be handled with due sensitivity and should aim to minimise the disruption and damage to the alleged offender's private and professional life.
12. These procedures must be implemented in conjunction with the procedures on allegations against carers, staff, and volunteers where appropriate.
13. For further guidance see also '*Complex child abuse investigation: inter-agency issues*, (HO & DH 2002). Detailed guidance for senior investigating officers is also contained in the ACPO document '*The investigation of historical/institutional child abuse – the senior investigating officer's handbook*'.
14. In the event of a complex abuse investigation being confirmed, key staff must be aware of the content of these documents.

### **Working with Complex Abuse**

15. Where there is suspicion of complex abuse, the social/duty worker or police officer receiving the referral should immediately inform their line manager.
16. Further advice is available from second tier managers. If managers agree that the referral constitutes a complex abuse allegation, the senior child protection/ Safeguarding Manager and the Detective Inspector should be informed and consulted.
17. Investigations of complex abuse will be carried out under the auspices of the Safeguarding Boards which should be kept informed of its progress.
18. The Toolkit attached describes the sequence of events in responding to concerns about potential complex abuse.

### **Scoping strategy meeting**

19. In order to assist the decision as to whether a complex abuse investigation is commenced, there should be a 'scoping' meeting involving the:

- Children's Safeguarding Service Manager and Senior Manager for Commissioning or their nominees
- Police Detective Inspector, or their nominee
- Senior Managers from any other agency with information to assist in determining the scale of the enquiry, including the referring agency.

20. The meeting needs to take account of the likely impact on the victim/s, the suspected offender/s and the community in deciding whether the investigation, or any course of action, is proportionate to the aim.

21. Factors to be considered include the:

- Extent or seriousness of the abuse (potential and actual numbers involved; the complexity of the circumstances; seriousness of injury or abuse; strength of public concern/feeling; the effect upon the community)
- Context in which the abuse occurred (degree of organisation; ritual; paedophile ring; access to children; employer/volunteer; school, nursery or other institution).

22. The scoping meeting must:

- Assess the information known to date
- Decide what further information is required at this stage
- Arrange for its gathering
- Establish whether, and to what extent, complex abuse has been uncovered
- Undertake an initial mapping exercise to determine the scale of the investigation and possible individuals implicated
- Consider any immediate protective action required
- Consider a plan for the investigation to be presented to the strategic management group, including resource implications, if a complex investigation is initiated

23. If the meeting decides that the case is likely to be sufficiently complex and resource intensive, then a full meeting of the strategic management group should be convened.

24. If the case does not meet this threshold, then the investigation will be managed under the normal arrangements described. If, after further enquiries are made, it becomes clear that the situation is more complex, the scoping meeting should be re-convened.

25. Where the extent of the complexity is unclear, there should be a further scoping meeting arranged to review the progress of the case.

### **Professionals who need to be informed**

26. Once the decision has been taken at the scoping meeting to initiate a complex investigation, the lead officer for Children's social care must be informed. They must inform the SEWSCB chairperson, the director of children's services, head of the media/press office and senior managers of relevant agencies e.g. designated child protection professionals.

## **Strategic Management Group**

27. To ensure a co-ordinated response, a strategic management group (SMG) meeting, chaired by either Children's social care or the police, must be convened as early as possible. The agency initiating the meeting will provide the administrative support.
28. The membership of the group should comprise of senior staff able to commit resources and will normally include the following:
  - Lead officer for Children's social care or nominee
  - Senior officer for Commissioning
  - Assistant chief police officer or nominee
  - Police Senior Investigation Officer (SIO)
  - Senior safeguarding/ child protection manager of nominee
  - Senior legal advisor (local authority)
  - Crown Prosecution Service
  - Assistant Director Education Department or nominee
  - Senior health representative
  - Press Officer
  - Other individuals and agencies as appropriate
29. Line managers of any staff implicated in the allegations of abuse must not be included in the strategic management group or the investigation team. The terms of reference of the SMG should be documented at the first meeting. All subsequent meetings held in accordance with this procedure should be classified as 'Official Sensitive' and all copies individually numbered. Any copying of minutes should be agreed with the chairperson.
30. The minutes should be arranged in the following format:
  - Time, date, location of the meeting
  - Persons present
  - Apologies
  - Details of all individuals subject of the enquiry (genogram)
  - Facts and circumstances known to date
  - Identified actions
  - Parameters of investigation
  - Terms of reference
  - Resource and management issues
  - Media issues
  - Miscellaneous
  - Exit strategy
  - Date of next meeting
31. Decisions and explanatory reasoning should be recorded in the policy book, a document used by the Senior Investigating Officer to record strategic and tactical decisions, who should also ensure the production of an action list for subsequent monitoring purposes.

32. The meeting must consider a wide range of issues and agree a plan that includes:

- A decision on the scale of the investigation and the staff required for a joint investigation group
- Focus of investigation: protection versus prosecution and what will and what will not be investigated
- Any cross boundary issues and planning of appropriate liaison and sharing of resources
- Identification of staff to manage the investigative process (usually the Child Abuse Investigation Team Detective Chief Inspector and Children's social care/operational manager)
- Identification of sufficient trained staff for the investigation (see below)
- Organisation of adequate accommodation including a dedicated major incident room (if required) and facilities for interviewing and recording interviews
- Arrangements for medical staff to conduct assessments
- Arrangements for sufficient administrative staff and information technology resources to support the investigation
- Proper legal advice including consultation with the CPS, litigation and any other legal implications
- Sufficient resources to ensure that children are protected from further abuse and that their welfare remains paramount (this should include appropriate foster, day-care or residential placements, medical, therapeutic, educational and practical services)
- Victim care
- Child witness support, if relevant
- Sufficient support, supervision and de-briefing of staff involved
- Availability of expert advice where necessary
- Liaison arrangements for inter-agency working
- Time scales for the stages of the investigation
- Allocation of specific tasks to personnel involved in the investigation together with line management responsibilities
- Management of public relations and media interest in the case
- Management of political arena
- Confidentiality/need to know arrangements
- Disclosure policy/information sharing
- Professional association interest (e.g. Police Federation and Unison)
- Free phone application – helpline for victims/information line
- Issues around financial compensation for victims
- Exit strategy
- Safety/security of records and appointment of disclosure officer

33. The SMG must ensure that any current risks to children are acted upon immediately, whenever they emerge during the investigation and should consider developing a risk management protocol as described at appendix C of '*Complex child abuse investigations: inter-agency issues*', (HO & DH 2002)

34. The SMG must make arrangements to convene regularly during the investigation to:

- Monitor the progress, quality and integrity of the investigation
  - Review risk indicators for the children involved
  - Consider resource requirements
  - Consider the appropriate timing of the termination of the investigation
  - Plan a de-brief meeting with the investigation management group to identify lessons learnt
35. The SMG should remain in existence at least until the Crown Prosecution Service has made a decision about the alleged perpetrators.
36. The SMG must inform the SEWSCB of the investigation and consideration given to the need for a serious case review.

### **Investigation Management Group**

37. This group led by the police Senior Investigating Officer or their deputy should include representative from Children's social care, education, health and local authority legal services. Other agencies should be invited as appropriate.
38. The role of this group will vary, but should include:
- A forum for the exchange of information, tactics and strategy, and to monitor the progress of the investigation
  - Ensuring consistent strategy for interviewing victims
  - Updating the SMG of the progress of the investigation
  - Updating the SMG on any resource shortages
  - Ensuring consistent support for victims and their families
  - Maintaining support for investigation team staff
  - Sharing information with agencies not represented on SMG
  - Ensuring compliance by the investigation team of policy and parameters set with regard to information sharing and confidentiality
  - Ensuring cross-flow of intelligence between agencies and the police major incident room
  - Setting policy

### **Investigation Team**

39. The SMG should identify individuals within and outside their organisation with the required expertise. This may include experience of investigating allegations of abuse, compiling profiles, understanding methods of abusers, child protection processes, disciplinary proceedings and working with victims, survivors and their families.
40. In selecting staff, consideration should be given to requirements arising from the individual needs of the relevant child/ren – e.g. gender, culture, race, language, and where relevant, disability.
41. The team members must be trustworthy and display sensitivity, honesty, empathy and personal maturity. They must all be wholly independent from any of the parties that are the subjects of the investigation.

42. Personnel seconded to the investigative team should be dedicated to the investigation and have no other responsibility.
43. The location of the group must take account, both geographically and organisationally, of the need to maintain confidentiality, especially crucial where the investigation concerns staff or carers.
44. Appropriate facilities must be available for video interviews and paediatric assessment.
45. Administrative support, information technology and accommodation requirements must be addressed at the outset, including the storage of confidential records.

### **Access to records**

46. One of the most difficult issues in complex abuse investigations relates to the tracing, use, management and disclosure of documentary information relevant to the investigation. The investigative team should consider what information is required and where it is likely to be, and take immediate steps to secure it within each agency.
47. Agencies should be made aware that they should provide copies of all files shared under this protocol and that a nominated senior manager should secure all files to ensure that they are not tampered with.
48. A vast range of documentary information will exist on personal files, personnel files, e-mails, general establishment records and registers. Clear protocols and procedures for investigative access to this material will need to be established at an early stage.
49. Where vital information may have been lost, damaged or destroyed over a period of time, consideration should be given to the establishment of a database containing details of known or potential witnesses and victims.

### **Information sharing**

50. These investigations rely critically on sensitive or highly confidential information being made available, including any information known about alleged perpetrators identified in the investigation. The principles of Information Sharing should be applied to all complex abuse investigations and team members should be familiar with its provisions.
51. The need to maintain the integrity of shared information is vital, and all investigative staff must be aware and comply with the principle of a 'need to know basis'. Consideration should be given to the use of confidentiality agreements with regard to individuals employed to undertake the investigation.
52. In addition to the issues regarding access to files and information sharing, consideration must be given for the need to share information about any known or suspected offender identified in the investigation.

53. Whenever a statement of complaint is received in respect of an alleged perpetrator, a risk assessment must be immediately undertaken with regard to what current risk that person may pose to other children.
54. Members of the investigation team should not undertake this task, but ensure that the appropriate information is shared with the multi agency risk panel situated in the area where it is believed the perpetrator is currently residing.
55. Further detailed guidance in this issue, together with advice on disclosure of material is contained in '*Complex child abuse investigations: inter-agency issues*', (HO & DH 2002)

### **Crossing geographical and operational boundaries**

56. It may be recognised at the outset, or during the investigation, that there are suspected or potential victims in more than one geographical area.
57. At the outset, the responsibility for managing the investigation lies with the Children's social care where the abuse is alleged to have occurred/where the alleged perpetrator/s are alleged to operate.
58. Once it is recognised that there are suspected or potential victims in other areas a joint approach should be made by the SMG to the appropriate police and Children's social care.
59. The initiating investigation management group and investigation team should undertake the investigation on behalf of the other geographical areas.
60. a senior manager from each area should join the initiating SMG to discuss this and agree any resource implications involved.
61. If the number of victims outside the geographical boundaries of the original joint investigative team increases to the extent that it cannot respond, then an investigation management group and/or investigation team in the new geographical area should be established.
62. It is essential that there is a joint SMG to provide overall planning. If it is necessary to have more than one investigative team, there must be close working between co-ordinators and processes for full information sharing.

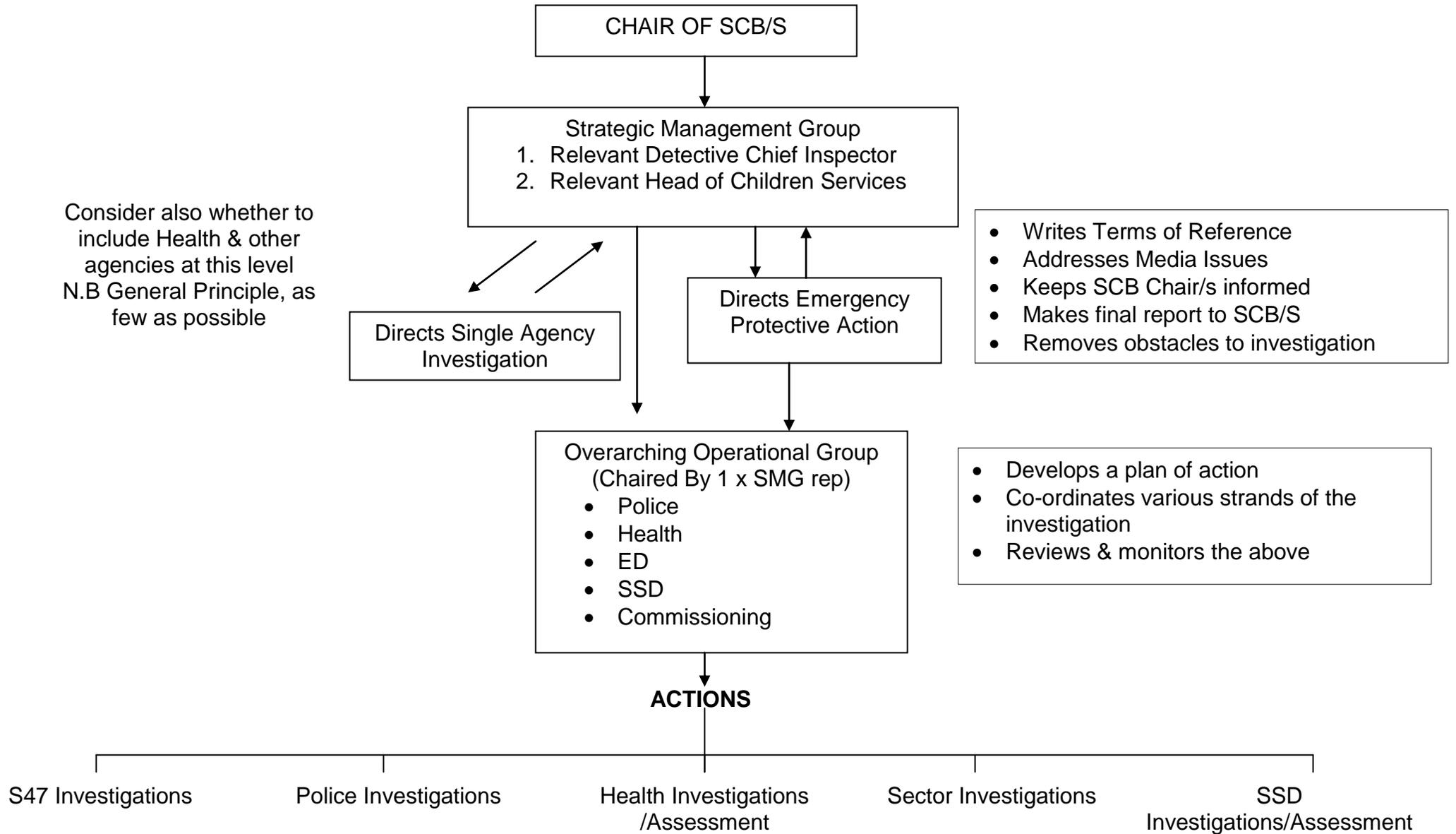
### **Closure**

63. There must be a clearly defined exit strategy not only in relation to the closure of investigation, but also with regard to victims and witnesses, who may require on-going support at the conclusion of any trial or investigation.
64. Staff involved directly in the investigation as well as other operational staff who have kept day to day services running where colleagues have been seconded into the investigation team, need to be thoroughly debriefed.

65. At the conclusion of the investigation each agency should undertake a review, with a view to identifying any changes to policy, practice or disciplinary processes that may be necessary. Such a review will complement any serious case review that may be concurrent or have been completed.
66. The SMG should have a final meeting where concluding information and debriefing can be shared. An overview report should be compiled and presented to the LSCB.
67. Consideration must also be given to the storage and security of the files relating to the investigation. Access to such records may well be necessary in relation to any on-going appeals, civil proceedings or applications for compensation.
68. Best practice is for the files to be centrally archived at a single location, and retained for a minimum period of 6 years from completion of the investigation, or six months beyond the completion of any sentence, whichever is the longer.

***TOOLKIT  
TEMPLATES  
FOR  
INVESTIGATIONS INTO  
ORGANISED/MULTIPLE  
ABUSE***

## PROCESS FLOWCHART FOR COMPLEX INVESTIGATIONS



## **PROGRESS REPORT TEMPLATE**

**Summary of Evidence**

**Summary of Corroboration**

**Additional Victims/Perpetrators Identified**

**Actions Take to Date**

## **RECORD OF DOCUMENTS VIEWED**

**Education**

**School 1**

**School 2**

**School 3**

**SSD File 1**

**SSD File 2**

**SSD File 3**

**SSD Legal Files**

**List Documents**







