

Office of the Children's Commissioner

"If it's not better, it's not the end"

**Inquiry into Child Sexual Exploitation in
Gangs and Groups: One year on**

Appendices

Appendix 1: Progress against recommendations

- A green status is awarded where a recommendation has been fully implemented.
- Where a recommendation is aimed at a collective of individual agencies (e.g. LSCBs), 100% of agencies must deliver the recommendation for a green status to be awarded. Where fewer than 50% of individual agencies have delivered the recommendation, a red status has been awarded.

Regulations and guidance				Status
Source	Agency	Recommendation	Commentary	
Acc report	Govt	Government should undertake a thorough examination of residential care, including the profile of children, location and type of homes, recruitment, qualification and training of staff, and analyses of how local authorities are meeting their duties under the sufficiency requirements.	<p>In response to the Report of the Office of the Children's Commissioner's inquiry into child sexual exploitation in gangs and groups, Ministers established three expert groups - the Task and Finish Group on Out of Area Placements, the Expert Group on Quality and the Data Working Group. The last of these reports was published on 23 April 2013. Various amendments were made to regulations as a result, in response to the OCC's recommendations. Ongoing work on Quality Standards for residential care is also encouraging.</p> <p>Furthermore, the Secretary of State for Education asked Sir Martin Narey to review the initial education of children's social workers, published in January 2014.</p> <p>Overall, government has undertaken a thorough examination of residential care since the conclusion of the CSEGG Inquiry.</p>	

Acc report	Govt	Government should amend the Care Planning, Placement and Case Review Regulations 2010 and related Guidance to state that a child's care plan should include a safety plan when the child/young person is at risk of or has experienced CSE. This should be based on a thorough assessment of need and explicitly address the risks the child faces, be negotiated with the child and engage family, supporting adults and, as appropriate, the police.	<p>Guidance states that <i>'where there is a possibility that a child will run away and go missing from a children's home placement, then the child's care plan, along with the placement plan, should include a strategy to minimise this risk'</i>.</p> <p>However, despite amendments made to the Care Planning, Placement and Case Review Regulations 2010 laid before Parliament on 23 December 2013, this amendment has not been made.</p>	
Acc report	Govt	Regulations should proscribe any child in care, or leaving care, from being placed in bed and breakfast accommodation.	<p>Volume 3 of the Children Act 1989 Guidance and Regulations on planning transition to adulthood for care leavers, updated in October 2014, states that <i>'Section 23B of the 1989 Act requires the local authority to provide relevant children with, or maintain them in, suitable accommodation. Bed and breakfast accommodation is not considered to be suitable'</i>. However, this instruction is not reflected in regulations.</p> <p>Barnardo's has found that 73% of local authorities in England placed care leavers in B&B accommodation during 2013-14, and 46% of local authorities in England placed care leavers repeatedly in B&B accommodation.</p> <p>The OCC does not consider the use of B&Bs for children in care or care leavers to be appropriate.</p>	
Acc report	Govt	Amendment should be made to Regulation 33 of the Children's Homes Regulations 2001 (as amended by the Children's Homes (Amendment) Regulations 2011). Monthly inspection visits to private children's homes should be by a person independent of the organisation running the home and appointed or approved by the local	<p>DfE has issued non-statutory advice to assist managers in children's homes and prospective providers of new children's homes to carry out duties under amendments to regulations that came into effect on 1 April 2014. Although amendments were made to Regulation 33, it is the view of the OCC that the suggested amendment has not been</p>	

		authority.	<p>made in full.</p> <p>The OCC recommended that the visits under the then Regulation 33 should be carried out by someone independent of the home. Section (3) of Regulation 33 enables employees to undertake these visits.</p> <p>It was the OCC's specific concern that any potential conflict of interest be avoided. Although the OCC notes that the DfE has made it clear in the non-statutory advice that these inspections should only be carried out by employees where there is "<i>absolute confidence in the ability of staff in these roles to reach an impartial judgment</i>", it is the OCC's view that if an 'employee' is permitted to undertake this task, there will be a lack of independence and the potential for a conflict of interest leading to reduced protection for the children placed.</p>	
Acc report	Govt	Consideration should be given to current planning regulations in relation to children's homes. Safeguards need to be put in place to ensure that children's homes are not opened in areas that present a high risk to the children being placed. This must include checks on numbers of registered sex offenders in the area.	This amendment has been made. DfE has issued non-statutory advice to assist managers in children's homes and prospective providers of new children's homes to carry out duties under amendments to regulations that came into effect on 1 April 2014.	
Acc report	Govt	The Government should amend the Care Standards Act 2000 (Registration) (England) Regulations 2010 to allow Ofsted to routinely share its information about the location of children's homes with the police.	This amendment has been made.	
Acc report	Govt	A review of all legislation and guidance which makes reference to children as 'prostitutes' or involved in prostitution should be initiated by the Government with the view to amending the wording to acknowledge children as sexually exploited, and where appropriate victimised	This recommendation has been accepted in principle by the Government. References to 'child prostitution' will be amended in legislation and guidance when opportunities arise, e.g. amendment of the Fostering Services (England) Regulations 2011, and amendment to the Children's	

		through commercial sexual exploitation.	<p>Homes Regulations 2001. However, the Government has also stated that amending all legislation and guidance which uses this term is not straightforward, as the wording may reflect an obligation to an international agreement, or may appear in the provisions of an Act of Parliament which can only be repealed by a further Act.</p> <p>In the report of a Parliamentary inquiry into the effectiveness of legislation for tackling child sexual exploitation and trafficking within the UK, chaired by Sarah Champion MP, Barnardo's recommended that "the Government should lead the world and progress the removal of all references of 'child prostitution' in legislation as soon as possible". It is clear that there is considerable support for removing all references to 'child prostitution' in legislation and guidance.</p> <p>Finally, since the conclusion of the OCC Inquiry, Ann Coffey MP has noted that regarding the offence of soliciting for the purposes of prostitution (Street Offences Act 1959), <i>"in the past four years between 2010 and 2013 there were 15 cautions issued to juveniles under the age of 18 and seven defendants under the age of 18 were proceeded against. Of those seven defendants, three were found guilty but none were imprisoned"</i>.</p> <p>The OCC strongly urges that no child should ever be regarded as a 'prostitute', and consequently, pursuing criminal sanctions against a child for offences related to prostitution is unacceptable.</p>	
Acc report	Govt	Consideration should be given to amending Regulation 11(2)(d) of the Care Planning, Placement and Case Review (England) Regulations 2010. Currently this requires authorities to notify the area authority where the child is to be placed. This could be strengthened by	This amendment has been made to the Regulations, creating the requirement to consult, share information and obtain DCS approval for such a placement.	

		<p>requiring the placing authority to consult with the area authority to assist their assessment that the placement is the most appropriate placement available and that it will meet the child's needs identified in the care plan. This would enable the placing authority to establish, for example, if there is known intelligence locally of sexual exploitation associated with the children's home or local area.</p>		
Acc report	Govt	<p>Consideration should be given, in the National Child Sexual Exploitation Action Plan, to the role of Local Safeguarding Children's Boards in having oversight of:</p> <p>a. The relationships between police and local authority children's homes in the local area, so that intelligence about groups of exploiters in the area and support to staff and young people can be provided</p> <p>b. Children who go missing and children at risk of or who have experienced exploitation: ensuring analysis of information gathered through Runaway Children and Missing From Care (RCMFC) records.</p>	<p>In July 2012, the DfE published a progress report on the 'Tackling Child Sexual Exploitation action plan'. This progress report acknowledges the OCC's recommendations, but does not contain a specific action for LSCBs to maintain oversight of relationships between police forces and children's homes in the local area, nor does it mention analysis of Runaway Children and Missing From Care records. This recommendation has not been implemented.</p>	
Acc report	Govt	<p>In line with the 2009 statutory guidance on children who run away and go missing from care, regulations should be amended to ensure when children have run away from care, that all return interviews involve an independent person, preferably an advocate or trusted adult from outside the home. These should enable young people to talk about any concerns including about the home. The content should feed into local police intelligence about sexual exploitation. Police 'safe and well' interviews should be considered as well – with the young person's agreement. Possibly through amendment to Sec 16 (4) (b) of the Children's Homes Regulations 2001 (as amended</p>	<p>Amendments to the Children's Homes Regulations 2001 have strengthened the responsibilities of care homes to develop a robust missing child policy. However, the specific recommendation to amend regulations to ensure that all return interviews involve an independent person has not been taken forward.</p>	

		by the Children's Homes (Amendment) Regulations 2011.		
Acc report	Govt	The Care Planning, Placement and Case Review Regulations 2010 and related Guidance should be amended to ensure that a child's Independent Reviewing Officer (IRO) should be informed when children run away and consider bringing forward the review. The IRO service should be informed about the pattern of absences or running away by children in care.	Amendment has been made to Care Planning, Placement and Case Review Regulations 2010 to ensure that IROs can undertake a review where the child is at risk of harm or 'persistently absent'.	
Final report	Govt	The Department for Education should review and where necessary, revise the Working Together guidance on CSE (DCSF, 2009). This should include a review of the definition of CSE.	<p>This recommendation has not yet been taken forward by the Department for Education, though a commitment has been made to revise the supplementary guidance. The OCC remains concerned that the definition of CSE outlined in the Working Together guidance on CSE does not reflect the development in expert thinking in this area since 2009.</p> <p>The definition of CSE in guidance is important. The OCC has found that the shortcomings in this definition have led agencies in local areas to adopt their own definition, causing confusion between agencies operating in different areas, and undermining attempts to implement a multi-agency approach to CSE. The OCC reiterates that the DfE should update guidance to reflect the significant improvement in expert knowledge regarding CSE since 2009.</p> <p>The main 'Working Together to Safeguard Children' guidance is currently under consultation, and the DfE has stated its intention to clarify "the LSCB role and responsibilities on CSE".</p>	

Interim report	Govt	The Department of Health should issue guidance to all health agencies to ensure effective information-sharing so that victims of child sexual exploitation, and children at risk of CSE, are identified.	<p>The Information Governance Review, Chaired by Dame Fiona Caldicott and published in March 2013, clearly stated that “<i>the duty to share information can be as important as the duty to protect patient confidentiality</i>”.</p> <p>In the Government response to the OCC’s Inquiry, it was clearly stated that “<i>we will also be working with the Information Commissioner’s Office to develop a myth-busting guide on information sharing</i>”. To date, this guide has not materialised, though publication is expected in spring 2015.</p>	
Police – strategic and operational responsibilities in regard to CSE				
Interim report	Police	Police forces should review their local multi-agency intelligence collection processes and existing information to proactively identify perpetrators of CSE.	95% of police forces have scanning processes in place to identify CSE. In 61% of cases, this includes data collected by partner agencies. Information sharing protocols between police forces and partner agencies are relatively patchy. Full details of police forces arrangements to collect information from partner agencies to assist in the identification of perpetrators are provided in Appendix 5. In brief, 30 police forces routinely collect information from local authority children’s services to identify perpetrators, 20 collect information from children’s homes, 22 from Youth Offending Teams, and 22 from schools. In addition to collecting information from partner agencies, police forces should ensure information is also shared where appropriate to enable preventative and protective action to take place.	
Interim report		All police forces should work with partner agencies, including third sector specialist organisations, to log information on the girls and young women linked to gang members, and then risk-assess these young people for	50% of police forces identify that criminally active gangs operate in their area. Of these police forces, only 37% have ‘fully’ mapped females associated with identified gang members to ascertain risk of CSE, though a further 42% have ‘partially’ undertaken this activity. Of these	

		sexual exploitation.	forces, 60% have used multi-agency intelligence in the mapping exercise. The OCC remains concerned that many girls and young women at risk of CSE as a result of their connection to peers involved in gang activity are not currently being detected.	
Interim report		Police forces should use multi-agency intelligence to proactively profile local risk, as well as to direct enforcement and disruption activity.	79% of police forces have produced a problem profile for CSE in their local area, and the remaining 21% plan to do so. Where problem profiles have been produced, in 63% of cases, they have been based on multi-agency data. This is despite all forces with a problem profile reporting that it is linked to the LSCB CSE strategy. Given the multi-agency coordination role of the LSCB, it should have been possible for all police forces to obtain intelligence held by safeguarding partners in the development of a problem profile. Problem profiles based exclusively on information and intelligence held by the police are inevitably limited, and will not capture the full scale and scope of CSE within the local area.	
Interim report		Police forces should improve their recording of sexual offences to enable the recording of multiple perpetrators and allow for a CSE flag.	82% of forces use their crime system to flag CSE related information; 39% of forces have a CSE flag on their incident system; and 87% of forces have a CSE flag on their intelligence system. In total, 29 police forces in England have mapped groups of multiple perpetrators, recording 105 groups in total, 76 of which are the target of active intelligence development operations. Overall, police forces have improved their capability to record CSE related offences.	

LSCBs – responsible for coordination and strategic response to CSE

Interim report	LSCBs	<p>LSCBs should agree policies and procedures for ensuring partner agencies including children’s social care services, YOTs and police work cooperatively to identify and deal with children and young people who are both victims and perpetrators of CSE. These procedures should be incorporated into each LSCB’s CSE strategy and monitored for effective practice.</p>	<p>Policies and procedures governing multi-agency responses to CSE are managed at a strategic level. The overwhelming majority (97%) of LSCBs report that CSE is now a strategic priority. Where CSE is not considered to be a priority, it has been subsumed under a broader strategic heading. In a very small number of cases, the local response to CSE has been evaluated against national guidance, and is now considered ‘business as usual’ rather than a priority.</p> <p>92% of LSCBs have produced a strategy for tackling CSE – this is a considerable improvement on 2013, when only 57% of LSCBs had a CSE strategy. However, of those LSCBs with a CSE strategy, only 66% are linked with other safeguarding strategies, and 61% with the strategies of neighbouring LSCBs. Given that CSE is closely linked with other safeguarding issues, it is a concern that CSE is regarded as a standalone issue. Many victims of CSE are moved across LSCB areas by perpetrators – without a close link between the strategies of neighbouring areas, there remains a risk that some victims will slip through the net.</p> <p>Finally, only 69% of LSCBs have undertaken a scoping exercise/strategic profile of CSE on the basis of multi-agency intelligence. Although this is a considerable improvement on 2013, when only 35% of LSCBs had undertaken this exercise, it is a concern that almost a third of LSCBs are not collating a multi-agency intelligence picture of CSE. Where this is the case, it is likely that many children at risk of or being sexually exploited are not detected. A further 26% of LSCBs indicate that this activity is planned.</p>	
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Interim report		Coordinated by the local safeguarding children board, and using the self-assessment tool produced by the University of Bedfordshire, all local areas should conduct their own audit of CSE based on the list of warning signs and vulnerabilities produced in this report.	43% of LSCBs have used the self-assessment tool produced by the University of Bedfordshire to audit CSE in their area.	
Interim report		Every LSCB should ensure that the core training delivered to all professionals who come into contact with children and young people should include information on warning signs, and impact, of child sexual exploitation, to ensure victim identification, and should outline an implementation plan for training as part of their 2013/14 business plan.	Since the conclusion of the OCC Inquiry, training on CSE has taken place in the overwhelming majority of LSCB areas. Training has covered the identification of young people at risk of or being sexually exploited, safeguarding young people from sexual exploitation and reporting concerns (97%). It has less commonly covered prevention (90%) and gathering evidence (81%). Nonetheless, it is encouraging that training on CSE is widespread. For knowledge of CSE to be embedded among relevant professionals, training should not be a one-off event, but integrated in regular professional development programmes.	
Final report		Every Local Safeguarding Children Board should take all necessary steps to ensure they are fully compliant with the Working Together guidance on CSE (DCSF, 2009).	<p>The OCC assessed levels of compliance among LSCBs with the key requirements of the Working Together guidance on CSE during the Inquiry. LSCBs were compared against factors including: the establishment of a CSE sub-group; the delivery of training; monitoring of prevalence; the establishment of local procedures; and the identification of CSE leads across key local agencies. In 2013, the Inquiry found that only 6% of LSCBs met the requirements set out in the guidance, and a third met half of them. In 2014, compliance with the requirements of the guidance has improved – 99% of LSCBs now meet half of the requirements, and over half of LSCBs now meet 13 out of 15. However, only 11% of LSCBs meet all of the requirements, and further work is clearly necessary to ensure full compliance.</p> <p>61% of LSCBs report having a dedicated CSE coordinator</p>	

			<p>in place. However, the nature of this position varies considerably – in some cases, the post is entirely strategic, in others, the coordinator may be required to undertake operational responsibilities, limiting their capacity to implement a CSE strategy. Regardless of the specific duties, it is important that the post is suitably resourced.</p>	
Final report		<p>Every Local Safeguarding Children Board should review their strategic and operational plans and procedures against the seven principles, nine foundations and the See Me Hear Me Framework in this report, ensuring they are meeting their obligations to children and young people and the professionals who work with them. Gaps should be identified and plans developed for delivering effective practice in accordance with the evidence. The effectiveness of plans, procedures and practice should be subject to an on-going evaluation and review cycle.</p>	<p>The OCC's See Me Hear Me framework has been influential in driving changes to practice – 68% of LSCBs have fully or partially reviewed plans and procedures against the See Me Hear Me framework since the conclusion of the Inquiry. In addition, 71% of LSCBs have fully or partially reviewed their plans and procedures against the nine foundations for good practice. Overall, 94 LSCBs (65%) have fully or partially reviewed their plans and procedures against both – this demonstrates a strong level of commitment to achieving best practice among LSCBs, using the OCC's Inquiry outputs. It remains a concern that a small number of LSCBs have not reviewed plans and procedures against the See Me Hear Me framework, or the foundations for good practice.</p>	

Final report		<p>There need to be nationally and locally agreed information-sharing protocols that specify every agencies' and professional's responsibilities and duties for sharing information about children who are or may be in need of protection. At the national level, this should be lead and coordinated by the Home Office through the Sexual Violence against Children and Vulnerable People National Group. At the local level, this must be led by LSCBs. All member agencies at both levels must be signatories and compliance rigorously monitored.</p>	<p>At a local level, 81% of LSCBs report having information sharing agreements in place, covering agencies in their area, with a further 11% responding that they are in the planning stages of establishing an information sharing agreement. However, some LSCBs have described information sharing agreements as being a component part of a CSE Strategy. The OCC emphasises that information sharing is a crucial element of multi-agency responses to all forms of child abuse, including CSE. Wherever possible, information sharing agreements should form a key part of the governance of multi-agency child protection arrangements in LSCBs, and should not be limited to CSE cases alone.</p>	
Interim	All agencies, led by LSCB	<p>All those identifying victims of child sexual exploitation should review their processes to ensure that intelligence or individual indicators used to proactively find victims children are not leading to biased identification. They should also liaise with agencies, including specialist third sector organisations, that are working with under-represented children and young people to ensure their identification of all those who are vulnerable or at-risk.</p>	<p>79% of police forces have produced a problem profile for CSE in their local area, and the remaining 21% plan to do so. Where problem profiles have been produced, in 63% of cases, they have been based on multi-agency data.</p> <p>The OCC remains concerned that prevalence mapping is not routinely undertaken on the basis of multi-agency intelligence mapping. It is necessary to examine data held by multiple partners in order to identify potential victims of CSE and therefore the scale of the issue in the local area (Appendix 3 outlines the prevalence mapping process and multi-agency problem profiling process in more detail).</p>	

Commissioning				
Final report	Health and Wellbeing Boards	Every local authority must ensure that its Joint Strategic Needs Assessment includes evidence about the prevalence of CSE, identification and needs of high risk groups, local gangs, their membership and associated females. This should determine commissioning decisions and priorities.	<p>Of the 153 Health and Wellbeing Boards in England, 55 have completed the OCC's questionnaire. Results are considered to be indicative of the national picture. Of those Health and Wellbeing Boards which responded, 52% have considered the availability of services for CSE in their Joint Strategic Needs Assessment, or a separate Health Needs Assessment (relating to FGM, substance misuse, sexual violence). Of those Health and Wellbeing Boards which have considered CSE, 46% have commissioned services to meet the level of need identified. 44% of Health and Wellbeing Boards had undertaken activity as a direct response to the OCC's Inquiry, and a further 22% plan to do so.</p> <p>Overall, although some Health and Wellbeing Boards have taken forward this recommendation, many more have not.</p>	
Problem profiling				
Final report	Home Office / LSCBs	Problem-profiling of victims, offenders, gangs, gang-associated girls, high risk businesses and neighbourhoods and other relevant factors must take place at both national and local levels. The Home Office, through the Sexual Violence Against Children and Vulnerable People National Group, should lead and coordinate the development of a national profile. Local Safeguarding Children Boards should do the equivalent at the local level.	<p>The Home Office Sexual Violence Against Children and Vulnerable People National Group has not led on the development of a national profile of CSE, though the Home Office is working with the Metropolitan Police to develop a 'problem profile' so that the police, local authorities, schools and other local agencies can identify which girls and young women are most vulnerable to gang-related sexual exploitation or crime.</p> <p>69% of LSCBs have undertaken a scoping exercise/strategic profile of CSE on the basis of multi-agency intelligence. Although this is a considerable improvement on 2013, when only 35% of LSCBs had undertaken this exercise, it is a concern that almost a third of LSCBs are not collating a multi-agency intelligence picture of CSE.</p>	

Pornography research				
Pornography	Research institutions	<p>Research should be conducted that investigates what children and young people think pornography is and the content of what they describe as pornographic</p> <p>Research should be conducted that investigates whether there are links between the pornography that children and young people are exposed to and/or access and their attitudes towards, aspirations about and feelings towards relationships and sex</p>	The OCC, NSPCC and BBFC have jointly commissioned the University of Middlesex to undertake research which examines the way in which children and young people are exposed to pornography, and how this affects their attitudes and behaviour.	
PSHE - RSE				
Pornography	DfE	The Department for Education should ensure that all schools understand the importance of, and deliver, effective relationship and sex education which must include safe use of the internet. A strong and unambiguous message to this effect should be sent to all education providers including: all state funded schools including academies; maintained schools; independent schools; faith schools; and further education colleges.	<p>The OCC has consistently underlined the importance of Relationships and Sex Education (RSE) to young people. In particular, the OCC has recommended that curriculum content include pornography, consent and sexual exploitation, in accordance with the findings of our Inquiry.</p> <p>Supplementary advice to the DfE sex and relationship education guidance, 'Sex and relationships education for the 21st century', was recently produced by the PSHE Association, Sex Education Forum and Brook.</p> <p>It is the OCC's view that RSE should be taught as part of a robust PSHE programme, and that PSHE be a statutory component of the curriculum. Many organisations and experts also hold this view, though to date, PSHE is not statutory.</p>	
Pornography		The Department for Education should ensure curriculum content on relationships and sex education covers access and exposure to pornography, and sexual practices that are relevant to young people's lives and experiences, as a means of building young people's resilience. This is sensitive, specialist work that must be undertaken by suitably qualified professionals, for example, specialist teachers, youth workers or sexual health practitioners.		
Pornography		The Department for Education should rename 'sex and relationships education' (SRE) to 'relationships and sex education' (RSE) to place emphasis on the importance of developing healthy, positive, respectful relationships.		
Final report		Relationships and sex education must be provided by		

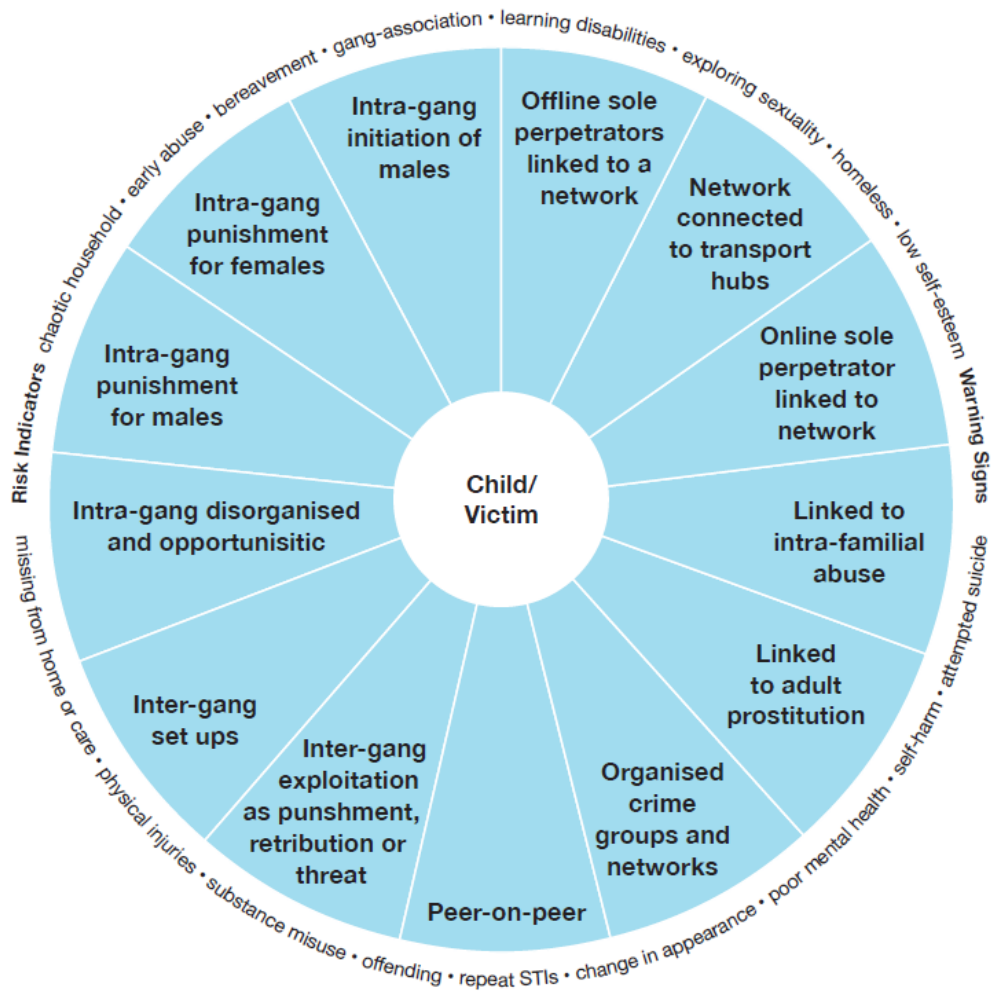
		trained practitioners in every educational setting for all children and young people. This must be part of a holistic/whole-school approach to child protection that includes internet safety and all forms of bullying and harassment and the getting and giving of consent.		
VAWG – Awareness raising				
Pornography	Govt	The Government, in partnership with internet service providers, should embark on a national awareness-raising campaign, underpinned by further research, to better inform parents, professionals and the public at large about the content of pornography and young people's access of, and exposure to such content. This should include a message to parents about their responsibilities affording both children and young people greater protection and generating a wider debate about the nature of pornography in the 21st century and its potential impact.	The Home Office has led a number of initiatives to deliver this recommendation, including active engagement with Internet Service Providers (ISPs) to establish network level filters to assist parents in the prevention of children and young people from accessing inappropriate content online, including pornography. Content accessed in public places via Wi-Fi is also filtered, when provided by the six major providers. The Government also led the WeProtect Global Summit, bringing together international stakeholders to facilitate a global response to online child sexual exploitation.	
Pornography	Govt	Through the commitments made to better protect girls and young women from gender-based violence in the ending violence against women and girls action plan, the Home Office and the Department for Education should commission further research into the safeguarding implications of exposure and/or access to pornography on children and young people, particularly in relation to their experiences of teenage relationship abuse and peer exploitation.	This action has in fact been taken forward by the OCC, NSPCC and BBFC, through the joint commissioning of the University of Middlesex to undertake research which examines the way in which children and young people are exposed to pornography, and how this affects their attitudes and behaviour.	
Pornography	Govt	The Home Office should incorporate the findings of this report into the ongoing teen abuse campaign. Future activity on this workstream should reflect young people's exposure to violent sexualised imagery within their peer groups and relationships.	The Government launched the 'This is abuse' campaign in December 2013, with advertising continuing until April 2014. The campaign was targeted at 13-18 year olds, with messages delivered through various channels. The campaign aimed to prevent teenagers from becoming victims and perpetrators of abusive relationships, reflecting	

			the findings of the OCC's Inquiry.	
Final report	Govt	Through the Sexual Violence against Children and Vulnerable People National Group, the Government should undertake a review of the various initiatives being funded by the Home Office, Department for Education, Department of Health and any others as relevant, in order to ensure services are not duplicated and that programmes are complementary, coordinated and adequately funded. All initiatives should be cross-checked to ensure that they are effectively linked into child protection procedures and local safeguarding arrangements.	<p>The National Group for tackling Sexual Violence Against Children and Vulnerable People (SVACV) has coordinated activity on tackling child sexual exploitation. Activities undertaken by the SVACV include:</p> <ul style="list-style-type: none"> • New guidance for police in relation to child abuse and exploitation. • Publication of a new Victims' Code in December 2013. • New powers for police to request information from hotels suspected of being used as locations for CSE. <p>Through this work, the OCC is satisfied that the SVACV is able to coordinate activities undertaken at a national level in regard to CSE.</p>	
Youth justice				
Interim report	Youth offending services	Youth offending services should share information on either or both victims and perpetrators of child sexual exploitation with other agencies, given the intelligence held on their assessment tools.	<p>The Youth Justice Board have ensured there are several areas within the new assessment and planning interventions framework, AssetPlus, where youth offending team practitioners can record concerns that a young person is exposed to or has access to pornography. For example, AssetPlus enables Youth Offending Team practitioners to record concerns regarding exposure to inappropriate sexual content in films or online, sexually inappropriate behaviour, and addictive behaviours including inappropriate use of technology.</p> <p>In a recent Criminal Justice Joint Inspection report (issued by HM Inspectorate of Probation, the Care and Social Services Inspectorate Wales, the Care Quality Commission, HM Inspectorate of Constabulary, HM</p>	
Pornography	Youth Justice Board	The Youth Justice Board should include questions on exposure and access to pornography within the revised ASSET assessment tool, to better inform understanding of possible associations with attitudes and behaviour and improve the targeting of interventions for young people displaying violent, or sexually harmful, behaviours.		

			<p>Inspectorate of Prison and Ofsted), it was found that <i>'the links between the YOS [Youth Offending Services] and partner agencies for protecting girls from sexual exploitation were underdeveloped and in some cases the lack of practical support meant that case managers were left with their concerns with no robust method of reducing the risks to the girls'</i>. Evidently, tools for sharing information are in place, though embedding Youth Offending Services within multi-agency responses to CSE requires further work.</p> <p>Finally, 25 police forces in England report having information sharing protocols regarding CSE in place with Youth Offending Teams.</p>	
Warning signs				
Interim	All agencies	All directors of children's services, the chief medical officer, directors of public health and chief constables, the Royal Colleges, Police and Crime Commissioners, and the Department for Education, the Crown Prosecution Service and Chief Crown Prosecutors, should circulate the warning signs of child sexual exploitation to all professionals who come into contact with children and young people, and ensure they understand and act on them.	82% of LSCBs have disseminated the warning signs to relevant professionals in their area. The OCC is more broadly aware that although many organisations have disseminated the warning signs of CSE to employees and members, some have not yet done so. It is important that this exercise is repeated periodically, in order to prevent complacency and maintain high levels of awareness.	

Appendix 2: Models of CSE

The CSEGG Inquiry identified at least 13 different types of CSE involving gangs and groups, as illustrated below, though this list is not exhaustive.



Appendix 3: Warning Signs and Risk Indicators

The following are typical vulnerabilities in children prior to abuse:

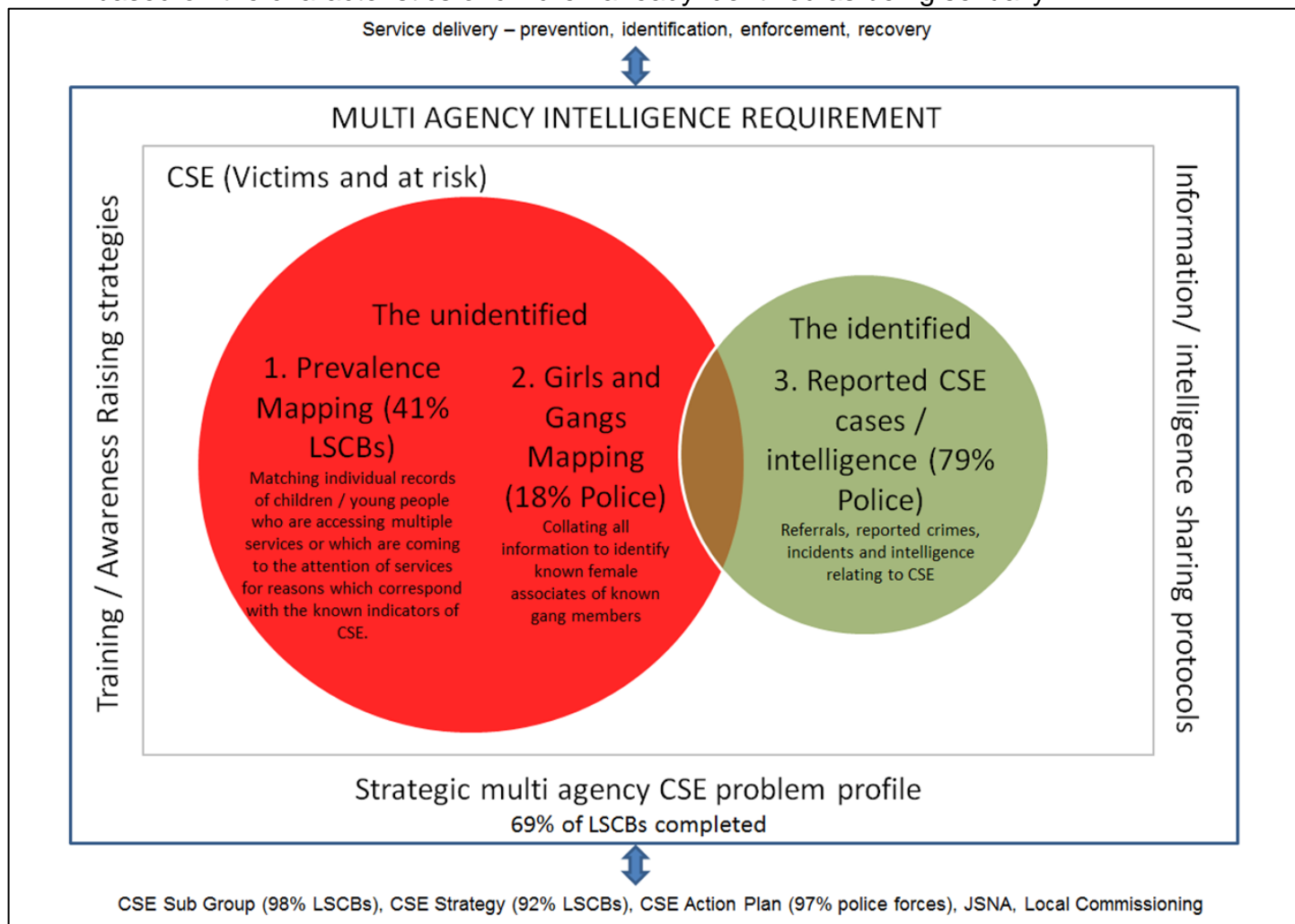
- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, parental criminality).
- History of abuse (including familial child sexual abuse, risk of forced marriage, risk of 'honour'- based violence, physical and emotional abuse and neglect).
- Recent bereavement or loss.
- Gang association either through relatives, peers or intimate relationships (in cases of gang associated CSE only).
- Attending school with young people who are sexually exploited.
- Learning disabilities.
- Unsure about their sexual orientation or unable to disclose sexual orientation to their families.
- Friends with young people who are sexually exploited.
- Homeless.
- Lacking friends from the same age group.
- Living in a gang neighbourhood.
- Living in residential care.
- Living in hostel, bed and breakfast accommodation or a foyer.
- Low self-esteem or self-confidence.
- Young carer.

The following signs and behaviour are generally seen in children who are already being sexually exploited.

- Missing from home or care.
- Physical injuries.
- Drug or alcohol misuse.
- Involvement in offending.
- Repeat sexually-transmitted infections, pregnancy and terminations.
- Absent from school.
- Change in physical appearance.
- Evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites.
- Estranged from their family.
- Receipt of gifts from unknown sources.
- Recruiting others into exploitative situations.
- Poor mental health.
- Self-harm.
- Thoughts of or attempts at suicide.

Appendix 4: Information sharing and problem profiling

This diagram outlines the way in which multi-agency CSE problem profiles based on the characteristics of children already identified as being sexually



exploited are fundamentally limited. It is necessary to undertake detailed prevalence mapping to identify potential victims of CSE.

- From the data collection plan a specific information requirement should be formulated for each agency detailing what is required from them in order to build an overall picture relating to CSE victims, offenders and locations of offending. This should be formulated and disseminated through the relevant local CSE agency leads (e.g. education, children's services, children's homes, health, police, YOT etc). This should include requests for the details of children and young people who hit the risk indicators of CSE. In addition this exercise should include local voluntary sector organisations undertaking work in this area (e.g. gangs, VAWG services).
- The collation of data / intelligence and monitoring of progress against the data collection plan and regular reporting of progress/ issues to LSCB sub-group for action where necessary.

- The analysis of data including the:
 - The abstraction of the key trends relating to the known victim, offender and locational profile of CSE in the area.
 - The collation and matching at an individual level the data relating to the risk indicators of CSE (e.g. missing from home, engaged in offending). Through identifying cross overs and repeats within data it is possible to gain an idea of prevalence and begin to proactively direct the use of interventions against those displaying the most warning signs and likely to be at greatest risk.
 - The layering of geographical information relating to locations of known offending, drug, gang and red light districts.
 - A comparison of the known profile/ scale of exploitation against those at risk (via the indicator data comparison) and the local demographics to identify potential hidden victims/ communities and enable specific responses to be developed (e.g. BME victims).
- Key findings to be written into a 'problem profile' and disseminated across partner agencies. CSE Sub Group to formulate a multi-agency action plan based on key findings and to address intelligence gaps. This should include clear action holders and set review periods.

Appendix 5: The role of LSCBs and their partners

The role and function of Local Safeguarding Children Boards is set out in sections 13 and 14 of the [Children Act 2004](#). The [Local Safeguarding Children Boards Regulations 2006](#) provide further details.

In brief, section 13 of the Children Act 2004 states that each Local Authority in England must establish a Local Safeguarding Children Board for their area, which must include representatives of the authority by which it is established, and each Board partner of that authority. Various Board partners are defined in the legislation, including:

- The police
- Local probation board
- Youth offending team
- Health service representatives
- Children and Family Court Advisory and Support Service

Section 14 of the Act specifies that the function of the LSCB is to coordinate the activities of each person or body represented on the Board for the purposes of safeguarding children in the area of the authority, and to ensure the effectiveness of this activity. Further details are outlined in section 5 of the Local Safeguarding Children Board Regulations 2006, reproduced here:

- developing policies and procedures for safeguarding and promoting the welfare of children in the area of the authority, including policies and procedures in relation to:
 - the action to be taken where there are concerns about a child's safety or welfare, including thresholds for intervention;
 - training of persons who work with children or in services affecting the safety and welfare of children;
 - recruitment and supervision of persons who work with children;
 - investigation of allegations concerning persons who work with children;
 - safety and welfare of children who are privately fostered;
 - co-operation with neighbouring children's services authorities and their Board partners;
- communicating to persons and bodies in the area of the authority the need to safeguard and promote the welfare of children, raising their awareness of how this can best be done, and encouraging them to do so;
- monitoring and evaluating the effectiveness of what is done by the authority and their Board partners individually and collectively to safeguard and promote the welfare of children, and advising them on ways to improve;
- participating in the planning of services for children in the area of the

- authority;
- undertaking reviews of serious cases and advising the authority and their Board partners on lessons to be learned

Overall, it is evident that these are strategic functions, rather than operational. The Board partners are responsible for the delivery of frontline services.

Appendix 6: Data summaries

Responses received from **100%** (n=148) of LSCB's in England. Figures will be based on a total of **145** submissions due to one LSCB submitting a combined response for three local authority areas under its control and another two LSCBs submitting one combined response for its two LSCBs.

Strategic planning

1. Is Child Sexual Exploitation (CSE) a strategic priority for your LSCB?

Yes	141 (97%)	No	4 (3%)	Don't Know	
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Of the four areas which have chosen to not consider CSE as a strategic priority:

2 LSCBs have encompassed CSE under a broader strategic heading (e.g. effective governance/ safeguarding outcomes or compliance with working together 2013/ early help)

2 LSCBs have decided to remove it as an explicit priority due to it being a previous priority and subject to extensive work. They continue to monitor activity but feel work on CSE is sufficiently embedded to not consider it a specific priority. Both of these LSCBs state they have audited/ evaluated their local safeguarding processes with specific regard to CSE using working together CSE guidance (2009) and Bedfordshire CSE self-monitoring tool.

2. Does CSE feature within your LSCB business plan?

Yes	142 (98%)	No	3 (2%)
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3. Has your LSCB produced a strategy for tackling CSE?¹

Yes	134 (92%)	No		Planned	11* (7%)
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*One responder left their response to this question blank.

If no, move to question 8 – Percentages for responses to Q5 to Q8 in red are based on a total of 134 (those which have a strategy)

¹ Referenced in 'Safeguarding Children and Young People from Sexual Exploitation' government guidance (2009).

4. Does your strategy include disrupting and prosecuting perpetrators?

Yes	129 (89%) 96%	No	5 (3%) 4%
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5. Were any of the following involved in the development of your CSE strategy?

Children/young people:	42 (29% 31%)
Parents/carers:	21 (14% 16%)

An additional 7 LSCB's have also indicated that they plan to involve children/ young people going forward and revise their strategy. Regarding parents/ carers, an additional 6 LSCBs are planning to undertake this going forward.

6. Is your CSE strategy linked to:

Other safeguarding strategies within your LSCB:	Yes	95 (66%, 71%)	Partially	34 (23%, 25%)	No	5* (3%, 4%)
CSE strategies in neighbouring LSCBs:	Yes	88 (61%, 66%)	Partially	29 (20% 22%)	No	17 (12% 13%)

*includes three which left response blank

7. Has your LSCB identified a specific CSE coordinator²?

Yes	89 (61%)	No	36* (25%)	Planned	20** (14%)
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* Includes one which left response blank

**includes one which specified that process is underway

8. Have lead professionals been identified/ named in key agencies operating within your LSCB (e.g. police, health)?

Yes	137 (94%)	No	8* (6%)
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* Includes one which says is planning to do this and one which says process of identification is underway.

9. Has a scoping exercise/ strategic profile been undertaken in relation to Child Sexual Exploitation which collates/ reviews the multi-agency intelligence picture in your area?

Yes	100 (69%)	No	7 (5%)	Planned	38* (26%)
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² Referenced in 'Safeguarding Children and Young People from Sexual Exploitation' government guidance (2009).

* Three LSCB's stated that their profile is already underway.

	Yes	Number identified Jan 2013 – Dec 2013	No
(a) Believed to be at risk of CSE:	126 (87%)	5669*	19 (13%)
(b) Believed to be experiencing CSE:	122 84%	2092**	23 (16%)

10. Do you collect data on the number of children/ young people who have been identified within your area who are:

* 79 (54%) LSCBs could provide actual data for the time period. Six of these could only provide data spanning a three to four month window as did not have data collections in place prior to this. The other 47 LSCBs say processes are in place but cannot provide data specific to the time period specified.

** 70 (48%) LSCBs could provide actual data re victims for time period.

9 LSCBs have provided the same number for those identified as being at risk and those who are victims. 2 of these have specifically said they are unable to distinguish between those who are at risk and those who are victims. There is therefore likely to be cross over between the at risk and victimisation figures.

Data collection/sharing

11. Are any of the following multi-agency groups in place within your area:

	Yes	Underway	Planned	No
Strategic CSE sub group under your LSCB ³ :	142 (98%)	0	1 (1%)	2 (1%)
Operational CSE team:	77* (53%)	10 (7%)	4 (3%)	54** (37%)
Gang multi-agency team:	39 (27%)	4 (3%)	3 (2%)	99*** (68%)
MASH	77 (53%)	11 (8%)	26 (18%)	31 (21%)****
Other (please specify):	73 (50%)	3 (2%)	1 (1%)	68 (47%)

* Two have said there MASE is an operational CSE team?

** Includes one blank

*** Includes two blank responses

**** Includes ten blank responses

1. Are there information sharing agreements between key agencies

³ Referenced in 'Safeguarding Children and Young People from Sexual Exploitation' government guidance (2009).

regarding CSE in place in your area:

Yes	118 (81%)	No	10 (7%)	Planned	16 (11%)	Don't know	1 (1%)
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12. Has your area undertaken an audit of the prevalence of CSE in your area:

Yes	82 (57%)	No	20* (14%)	Planned	41 (28%)	Don't know	2 (1%)
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*One blank

a) If yes, please specify:

(i) Whether the audit involved the collation and analysis of multi-agency data which correspond with the CSE warning indicators⁴: **Percentages in red are based on a total of 82 (those who have undertaken a prevalence audit)**

Yes	60 (41%, 73%)	No	12* (8%, 15%)	Planned	7 (5%, 9%)	Don't know	3 (2%, 4%)
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* Three blanks included. In total it would be 52% of LSCBs who have not yet done a prevalence mapping exercise which includes collation of multi-agency data.

(l) Are you planning to repeat the exercise?

Yes	51 (35%)	No	10* (7%)	Don't know	8 (6%)
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* Includes four blank responses

Intervention/Resource Provision

13. Do you have specialist services (both statutory and non-statutory) in place within your area to specifically work with children either at risk of / which are being sexually exploited?

Yes	123 (85%)	No	20* (14%)	Don't know	2 (1%)
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*Includes one blank response

Awareness/Training

14. Has your area provided any local training to professionals on*:

(a) How to identify young people at risk, or experiencing sexual exploitation	141 (97%)
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⁴ Subject of a recommendation and the corresponding methodology was highlighted in the CSEGG interim report http://www.childrenscommissioner.gov.uk/content/publications/content_636

(b) How to safeguard young people from sexual exploitation	140 (97%)
(c) How to gather evidence of sexual exploitation	118 (81%)
(d) How to report concerns of CSE	140 (97%)
(e) How to prevent CSE	131 (90%)

* A number of LSCB's have also indicated that they are planning to run some activity across these themes.

15. Has your LSCB provided advice or run awareness campaigns on/to:

	Identifying CSE	Reporting concerns	Understanding Consent	Or all three strands
(a) Parents and carers?	46 (32%)	39 (27%)	0	50 (34%)
(b) Young people?	30 (21%)	23 (16%)	3 (2%)	76 (52%)
(c) Professionals?	26 (18%)	25 (17%)	0	114 (79%)

16. Has your LSCB disseminated the CSE warning signs published in the CSEGG interim report to relevant professionals within your area?

Yes	119* (82%)	No	7** (5%)	Planned	16 (11%)	Don't know	3 (2%)
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* includes two which said they have done a partial dissemination.

** includes three blank responses

Evaluation

17. Does your LSCB undertake periodic audits of multiagency safeguarding arrangements within your area with specific regards to CSE

Yes	93 (64%)	No	37 (26%)	Planned	13 (9%)	Don't know	2 (1%)
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a) Has this review utilised any of the following resources:

Safeguarding Children and Young People from Sexual Exploitation (2009) Government Guidance:	81 (56%)
DFE CSE Step by Step guide for practitioners:	66 (46%)
Bedfordshire CSE 'self-monitoring tool':	62 (43%)

18. Has your LSCB reviewed its plans and procedures against the following parts outlined in the OCC's Final Report 'if only someone had listened'⁵?

a. The nine foundations for good practice:

Yes	62 (43%)	No	13 (9%)	Partial	41 (28%)	Planned	28 (19%)	Don't know	1 (1%)
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b. The See Me, Hear Me framework:

Yes	64 (44%)	No	12 (8%)	Partial	35 (24%)	Planned	32 (22%)	Don't know	2 (1%)
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⁵ Berelowitz, S. et al (2013). "If only someone had listened" The Office of the Children's Commissioner's Inquiry into Child Sexual Exploitation in Gangs and Groups Final Report. London: Office of the Children's Commissioner.
http://www.childrenscommissioner.gov.uk/content/publications/content_743

POLICE DATASET REQUEST

Results below are based on a total of 38 police services in England. British Transport Police was excluded due to its specialist nature and City of London Police due to its small comparative size.

STRATEGIC PLANNING/PRIORITISATION (Strategic lead)

1. Has your police service produced any strategic analysis/problem profiles in relation to CSE:

Yes	30 (79%)	No	0	Planned	8 (21%)
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- a) If yes, does this include multi agency data/ intelligence?

Yes	19 (50%, 63%)	No	3 (8%, 10%)	Planned	8 (21%, 27%)
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% - Percentages in red are calculated based on a total of 30 forces which stated they had a Problem Profile/ Strategic analysis.

2. Is there an action plan in place in relation to CSE involving:

Yes	37 (97%)	No		Planned	1 (3%)
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- a. If yes, is this plan linked with the LSCB CSE strategy:

Yes	37 (97%, 100%*)	No	
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* % Based on 37 police services which said had an action plan for CSE.

3. Do you have any scanning processes in place to identify CSE within your police service?

Yes	36 (95%)	No	2 (5%)
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If yes:

How regularly is the scanning undertaken?

Daily	Weekly	Monthly/ Bi monthly	Combinations*
24 (63%, 67%)	3 (8%, 8%)	5 (13%, 14%)	4 (11%, 11%)

* Combinations include one force which has scanning processes setup to run daily/ weekly / monthly and three forces which have a daily and monthly scanning process.

Does it routinely include data collected by agencies outside the Police?	Yes	23 (61%, 64%)	No	13 (34%, 36%)
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ALL OF BELOW:

4. Has your police service commissioned/ provided any internal training to professionals on (mark with an X as appropriate):

29 (76%)

(a) How to identify young people at risk, or experiencing sexual exploitation*

9 (100%)

(b) How to safeguard young people from sexual exploitation*

8 (97%)

(c) How to gather evidence of CSE*

5 (89%)

(d) How to prevent CSE*

1 (79%)

*% re a b c and d are based on a cumulative total of police forces including those which said they provided training in all the above scenarios.

5. Has your police service disseminated the risk indicators of victims/ those at risk of CSE to all its staff which come into contact with children and young people:

Yes	25 (66%)	Partial	11* (29%)	No		Planned	2 (5%)
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*2 forces recorded partial and planned. Consequently the count was included partial to avoid duplication but this may be indicative that a broader dissemination is planned.

a) Were these the risk indicators detailed in the OCC CSE in Gangs and Groups interim Inquiry report⁶?

Yes	24 (63%, 67%*)	No	3 (8%, 8%)	Don't know	9 (24%, 25%)
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*Red percentage and totals based on those which said that they had partially or fully disseminated CSE risk indicators.

6. Are there any criminally active gangs⁷ operating within your police service

⁶ Berelowitz et al (2012): 'I thought I was the only one. The only one in the world.

http://www.childrenscommissioner.gov.uk/content/publications/content_636

⁷ Definition of gang can be found in appendix A.

area:

Yes	19 (50%)	No	19 (50%)
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a) If yes, please specify:

i)	The number of gangs believed to be currently criminally active within your service (including those which travel into your service from other Police service areas):	251 (Only 14 forces provided data).					
ii)	If your service has mapped the females associated with identified gang members (including intra-familial/ intimate associations):	Yes	7 (18%, 37%)	No	4 (11%, 21%)	Partial	8 (21%, 42%)

Red % based on 19 forces which said had gangs.

If yes or partial:

iii)	Did this involve multi agency intelligence	Yes	9 (24%, 60%)	No	4 (11%, 27%)	Partial	2 (5% 13%)
iv)	What activity has happened as a result?	8 responses predominantly focus on a criminal justice response (i.e. arresting/ proactivity on offenders) being undertaken.					

7. In relation to CSE, please provide detail where known on:

	Gang(s)	Group(s)
a. How many networks of perpetrators have been identified & are suspected to be currently active involving:	17 Gangs across 7 forces.	105 across 29 forces
b. How many of these networks are currently being targeted through active intelligence development operations:	17 across 7 forces (all of above)	76 across 27 forces

8. Does your police service have a flag or process for tracking all CSE related information on any of the following systems:

	Yes	If yes, please outline the volume (Apr 2013 – Mar 2014)
Crime system	31 (82%)	3355 (provided by 18 forces over the period (one force said had

		flag but had no recorded crimes over period)).
Incident system	15 (39%)	1421 (provided by four forces - one force gave an estimate of 16 a month and aggregated this up).
Intelligence system	33 (87%)	3529 logs (provided by 13 forces)

9. Has your police service developed either solely or with the LSCB a multi-agency intelligence requirement for CSE?

Yes	29 (76%)	No	8 (21%)	Don't know	1 (3%)
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10. For the following partner agencies please detail whether:

- A formal information sharing protocol is in place with the police
- Whether your service receives information routinely from that partner agency to assist proactive perpetrator identification
- The format and nature of any such information transfer

	Information sharing protocol in place (Full/Partial / None)	Routinely collect info from to assist proactive identification of perpetrators *
Children's services:	Full: 31 (82%) Partial: 4 (11%)	30 (79%)
Children's homes:	Full: 18 (47%) Partial: 9 (24%)	20 (53%)
Youth Offending Teams:	Full: 25 (66%) Partial: 3 (8%)	22 (58%)
Health – CAMHS:	Full: 20 (53%) Partial: 4 (11%)	13 (34%)
Health – Substance misuse services:	Full: 21 (55%) Partial: 4 (11%)	15 (39%)
Health – Sexual health services:	Full: 20 (53%) Partial: 6 (16%)	17 (45%)
Schools:	Full: 22 (58%) Partial: 4 (11%)	19 (50%)
Probation:	Full: 25 (66%) Partial: 3 (8%)	19 (50%)
Neighboring police services / CEOP:	Full: 21 (55%) Partial: 6 (16%)	25 (66%)
UKBA:	Full: 13 (34%) Partial: 5 (13%)	7 (18%)
Voluntary services:	Full: 21 (55%)	21 (55%)

	Partial: 3 (8%)	
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* Includes where said partially happens.

11. Does your force experience any barriers with regards to multi agency data sharing?

Yes	21 (55%)	No	16 (42%)	Don't know	1 (3%)
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Health and Wellbeing Boards CSE Dataset

The data below is based on 54 responses from Health and Wellbeing Boards (HWBs) in England to the dataset request (35% of all HWBs).

Questions

1) Please state whether you have undertaken specific HNAs and/or included any of the following areas relating to children and young people in your JSNA and:

1. If the availability of existing services against the indicated need was considered in the analysis.
2. If the effectiveness of said services was considered in the analysis.
3. Whether services have been commissioned against the indicated need in the analysis.

CSE:	Yes	Partial	Planned	No	Notes
Included in JSNA	20 (37%)	2 (4%)	4 (7%)	28 (52%)	
Full specific HNA	4 (7%)			50 (93%)	
Considered in a related HNA :	8 (15%)			46 (85%)	Included in HNAs involving FGM, substance misuse, sexual violence and vulnerable children HNA.
Planned			16 (30%)		
CONSIDERED IN HNA/ JSNA	28 (52%)			26 (48%)	See table 2
Is the availability of services against the indicated need considered in the analysis?	17 (31%)		3 (6%)	8 (15%)	
Is the effectiveness of those services considered in the analysis?	16 (30%)		2 (4%)	10 (19%)	
Have services been commissioned against the indicated need	13 (24%)	1 (2%)	6 (11%)	8 (15%)	

How CSE has been incorporated	No of HWB's	% of all respondents
JSNA & HNA specific:	3	6%
JSNA & related HNA	3	6%
JSNA only:	16	30%
HNA specific	1	2%
HNA Related	5	9%
Total	28	48%

2) Have you undertaken any activity that has been influenced by the findings or recommendations directed to Health and Wellbeing boards in these reports?

	Yes	No	Planned
Child Sexual Exploitation involving Gangs and Groups Inquiry Final Report	24 (44%)	19 (35%)	12 (22%)

3) Have you undertaken any activity that has been influenced by the findings or recommendations directed to Health and Wellbeing boards in these reports?

Yes	12	22%
Partial	7	51%
Planned	8	13%
No	28	15%
Total	55	100%

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