

Isle of Man Safeguarding Procedural Protocol for Children and Young People who are at risk of, or experiencing exploitation. ¹



¹ With thanks to the London Borough of Barnet, Safeguarding Children Partnership's Protocol 2018

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1. Introduction

Traditional concepts of safeguarding children and young people from harm have focussed primarily on harm that can occur within families and by adults that are close to or known by the children and young people.

Children and young people at risk of, or already suffering from harm due to exploitation experience these risks outside of the home. Such as:

Sexual exploitation:	Criminal exploitation:	County Lines:
Being tricked or pressured, by an adult or friends of a similar age, into sexual activity in return for something – like attention, love, food, shelter, cigarettes, drugs, alcohol, gifts or money.	Being tricked, enticed, manipulated or threatened to break the law; like carrying drugs, stealing, harming other children or young people.	Being tricked or frightened into being associated with or part of groups that are moving drugs, money, or establish a base for this activity – by taking over someone else's home. This is called cuckooing.
Grooming: Children and young people are drawn into the above types. Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate exploit and abuse them.		
Even when a child or young person's looks like they are consenting to any of the above – it is still abuse.		

The children most likely to fall victim to this type of abuse are usually more vulnerable due to other factors that undermine their resilience like (*although this link is not exhaustive*):

- Neglect or abuse
- Being looked after
- Bereavement and Abandonment
- Being exposed to Domestic abuse and control or coercive behaviour
- Going missing from home or a care setting like foster care or residential care
- Not attending school, including absenteeism, exclusion or school refusal
- Being involved in crime or anti-social behaviour
- Being on the edge of or becoming involved with gang activity
- Poor mental health
- Substance misuse

The complexity of this type of abuse makes it imperative that professionals across a range of environments can identify children or young people at risk or experiencing harm, so that steps can be

taken to protect them and disrupt the actions of those that seek to exploit them. This protocol sets out how the multi-agency partners on the Isle of Man have committed to work together to safeguard children and young people from exploitation. Our multi-agency approach to safeguarding children and young people uses the 4 pillars to shape how we plan and work our services. These include:

Prevent:	Pursue:	Protect:	Prepare:
To prevent children and young adults experiencing exploitation, modern day slavery and going missing; and to ensure children and young adults, and their families and their communities are supported to build resilience against exploitation.	To prosecute those who perpetrate or facilitate exploitation. Robust offender management post-conviction and/or effective strategies reduce the risk presented by identified abusers.	To provide appropriate support, protection, intervention, information and services to children, parents, carers, friends and communities via a multi-agency whole family approach. To use the appropriate legislation to protect children and young people.	Divert, disrupt and actively pursue those intent on exploiting children and adults. Those who seek to exploit children and vulnerable adults are identified, disrupted and prosecuted.

The driver for this work and the review of how we work locally has been mobilised by the local appetite to effectively safeguard children and young people, as well as learning from a local Serious Case Management Review and learning from neighbouring jurisdictions. The local Serious Case Management Review can be found by following this [link](#) on the Safeguarding Board website.

2. Our commitment to working effectively with children and young people to keep them safe from exploitation.

When working with children, young people and their families we will always aim to:

- Place the safety of children and young people first.
- We will be curious about past harm and other factors that we know reduce resilience in families.
- We will use information from missing episodes and share information to understand the picture of local risk for individual children and young people as well as groups. Our commitment to sharing information for the purposes of safeguarding are set out in the Isle of Man Safeguarding Board Information Sharing Guidance and Protocol which can be found by following this [link](#).
- We will assess risk to individual children and young people using a consistent assessment tool and form consistent risk management plans.

- We will work creatively to support children and young people with risk management plans and we will review these to ensure that the joint agency activity is making a difference.
- We will keep a centralised record of children and young people who are vulnerable to or being exploited and review this to measure changes in outcomes for children and young people.

3. Leadership and Governance

This protocol has been developed by the Isle of Man Safeguarding Board in partnership with Isle of Man Constabulary, Department of Education, Sport and Culture, Manx Care², Department of Home Affairs, Isle of Man Prison and Probation Services.

The aims of this protocol are threefold:

1. To set out how we have committed to working together to safeguard children and young people.
2. To provide a framework for the assessment of risk and interventions for children and young people at risk of harm through exploitation.
3. To encourage agencies and practitioners to work together to prevent children and young people from going missing, support their safe return and ensure the risks they face are robustly managed and responded to.

The Board's function is to scrutinise how well the lead partners work together to keep children and adults safe and to hold them to account for the effectiveness of their safeguarding activities. This is done through the main Board with the support of the Action and Intervention Panel (AIP). There is also a multi-agency Vulnerable Adolescents Task and Finish Group that has developed a work plan and is responsible for making sure that progress is being made against that workplan.

4. Definitions

Child Sexual Exploitation (CSE) is a form of child sexual abuse that affects both boys and girls. Sexual abuse may involve physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

The definition of child sexual exploitation is as follows: 'Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual

² Where Manx Care is referred to in this document this includes reference to health services and adult and children social care services.

activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology'. Department of Education, February 2017.

Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision-makers working to protect children from child sexual exploitation, available at:

www.gov.uk/government/consultations/statutory-definition-of-child-sexual-exploitation.

Whilst there is no reference to exploitation in Safeguarding Together 2018, procedures for professionals working with children can be found on the Board's website by following this [link](#).

County Lines County lines is a term used to describe gangs and organised criminal networks involved in importing illegal drugs into one or more locations. On the Isle of Man this can be criminal networks based in the UK, who have local connections and together they facilitate the importation of drugs to the Island and control the dealing of them using mobile phone lines or other drug dealing methods such as 'snapchat dealing accounts'. These criminals exploit children and vulnerable adults to receive, move (including the advertising or sale of drugs) or store the drugs and money on their behalf. They will often use coercion, grooming, intimidation, violence or weapons in order to gain compliance from the victims of this exploitation.

Child Criminal Exploitation (CE) is defined as "where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology."

Criminal exploitation of children is broader than just county lines and includes for instance children forced to work on cannabis farms or to commit theft. Further reading can be found by following this [link](#).

5. Information Sharing - Safeguarding is everyone's business

Young people may find it difficult to trust and share information pertinent to their experience of being groomed or exploited, especially those who are experiencing CSE or CE. These young people may not want to share information about their friends, associates or places they have been because it could put them at risk to do so. The child or young person will therefore need time to build trust with you to share such details.

Where this isn't possible to build a relationship with the child or young person, for example in a hospital setting, it is essential that information is gathered and recorded effectively. It is only through the pro-active sharing of information that we can build a picture of a young person's lived experience or understanding of what it is like to live their life. Without this insight it will not be possible to assess the level of need or develop plans to keep them safe.

Similarly, it is of utmost importance that information is shared at a strategic level to understand the prevalence of harmful behaviour, so that we can take steps to tackle perpetrators, disrupt the targeting of children and young people and intervene in areas that appear to be 'hotspots' or areas of interest. E.g. local parks where perpetrators are known to frequent to target, groom or recruit children or young people.

The Safeguarding Board has recently co-produced the IOM Information Sharing Protocol involving contributions from the Information Commissioners Office, Children’s Social Care, Adult Social Care, Schools, Police and Manx Care. If you have any doubts about when and how to share information, you should always discuss these doubts with your line manager and/or your Designated Safeguarding Lead or refer to the Information Sharing Guidance and Protocol which can be found by following this [link](#). There is a specific case study dealing with information sharing where there are concerns about young people and exploitation.

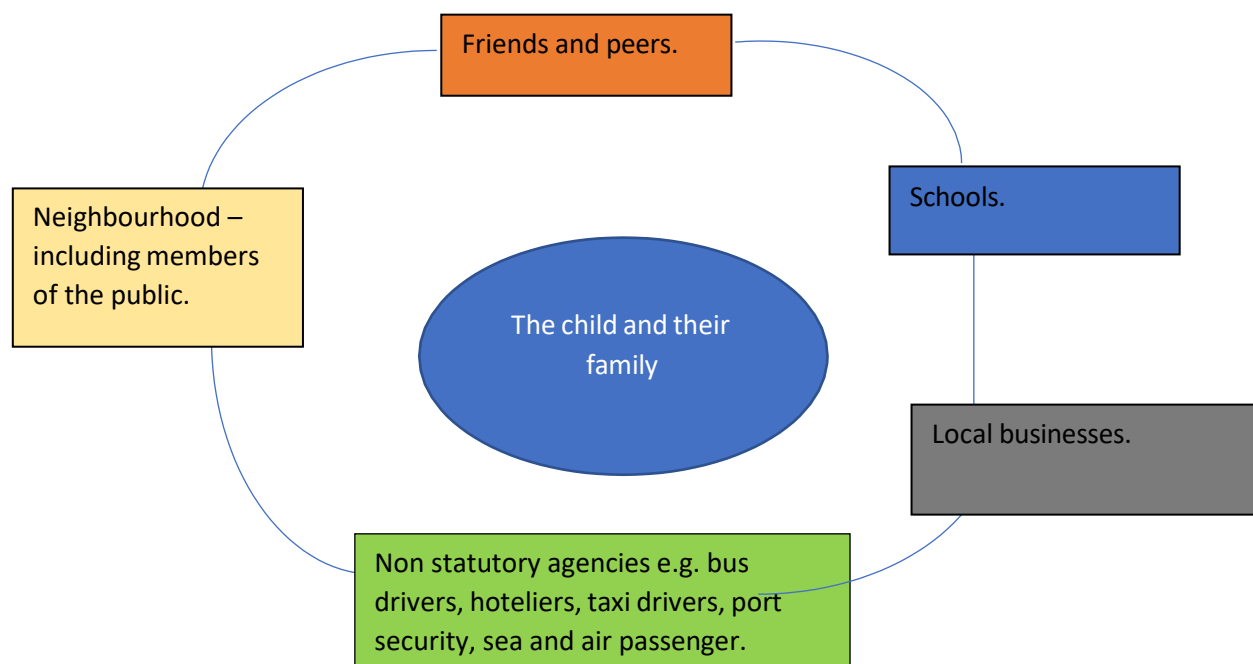
It is difficult to foresee circumstances where information law would be a barrier to sharing personal information with other practitioners where there were concerns about a child or adult’s welfare or safety.

The IOM Safeguarding Board Myth Busting Guide 2021

Community awareness:

If the contextual risks to children and young people are to be understood it is vital that that context is understood. The context in this instance is the local community. Our understanding of community is set out in the figure below:

Fig 1:



Community recognition and assessment of risk:

The multi-agency Vulnerable Adolescents Task and Finish Group have agreed that the SAFEGUARD mnemonic³ will be adopted and promoted across the local community to encourage the positive recognition of children and young people being exploited. SAFEGUARD offers a useful number of prompts to help professionals working with children to think about different ways in which children or young people may be affected by exploitation. This is shown below in Fig 2.

Fig 2:

S	Sexual identity, wellbeing and choice. Sexually transmitted infections, pregnancy; terminations; changing or out of character sexual behaviour; exploring sexual relationships in an unsafe context or environment; unable to disclose sexual orientation and fearful of societal responses
A	Absence, truancy and going missing. Truancy from school, including during the school day; missing from home or care, and repeat incidents; travelling outside of the town or off island when missing; unexplained absences.
F	Family and home Sexual, physical, emotional abuse and neglect; risks of forced marriage or so-called honour-based violence; female genital mutilation; domestic violence; substance misuse; parental mental health concerns; abandonment, bereavement; parental and sibling criminality; experiences of homelessness or sofa surfing; living in care or temporary accommodation; immigration status.
E	Emotional and physical health. Suicidal thoughts, plans and attempts; self-harm; low self-esteem/confidence/worth; learning difficulties; changing emotional wellbeing and signs of poor mental health; unexplained injuries and changes in physical appearance.
G	Gangs, Groups, Age Gaps and Crime Involvement in gangs or gang affected family, peers or siblings; concerns of abusive peer groups; involvement with older individuals or groups, lacking friends in the same age groups; older 'boyfriends'; sudden changes in peer groups; bullying, both on and off line; friends of young people experiencing CSE.
U	Use of technology and sexual bullying. Sexting, both sending and receiving; being listed on social network pages about sexual activity and, or named in videos; secretive use of the internet/phones/social networking sites; sudden behaviour changes when using the phone or internet; control via phone or internet; multiple or secretive social networking profiles.
A	Alcohol and substances. Reliance on and changing use of substances, both legal and illegal.

³ With thanks to the London Borough of Barnet for permission to use the safeguard mnemonic the Island.

R	Receipt of unexplained gifts or money.
D	Distrust of authority figures. Resistance to communicating with parents, carers, teachers, social services, health, police and others.

6. The Assessment of Risk by Statutory Agencies (police, health and children's social care).

The Vulnerable Adolescent Task and Finish Group have reviewed and agreed upon an assessment tool and which will can be used to offer a consistent understanding of risk. It has been reviewed and considered to best fit our local context in the Isle of Man.

To ensure consistent and universal understanding of risk it is an expectation that any referrals into the Intake and Assessment team are framed using the Safeguard mnemonic above.

This information will be assessed by members of the Daily Exploitation Meeting (DEM) who use the Child Exploitation and Missing (CEAM) measurement tool to consider the next steps. The CEAM tool is shown in Appendix 1.

Assessments of risk using the CEAM tool will be undertaken by statutory partners⁴ in the DEM and will be signed off by the Intake and Assessment team manager, as the lead agency for safeguarding.

Where there is already an allocated worker there will be an agreement between the worker and their line manager about the need to update the CEAM.

7. Threshold

If a child or young person under the age of 18 years old, is believed to be at risk of or experiencing exploitation, they will automatically meet the threshold for a complex needs assessment by Children's Social Care. This assessment would be undertaken with the consent of the parent/s. If the withdrawal of the parental consent resulted in a heightening of professional concern, a strategy meeting will be triggered.

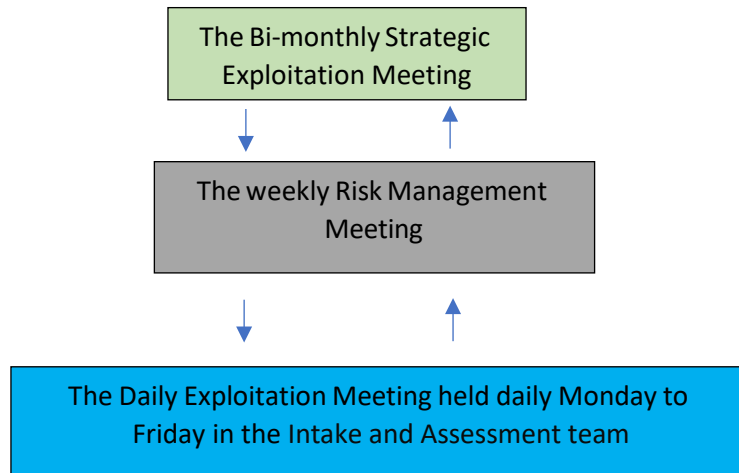
The multi-agency professionals in the Daily Exploitation Meeting will use the available information to assess whether an urgent CEAM strategy meeting is required, with final sign off by the Intake and Assessment team manager.

⁴ Health, education, police and children's services

8. Local Arrangements for Assessing Risk

Below is a diagram explaining how the different meetings link and interact, to ensure the best possible operational and strategic responses to children and young people at risk of exploitation.

Fig 3.



The Daily Exploitation Meeting

The Daily Exploitation Meeting will take place daily, Monday to Friday. This meeting is a multi-agency meeting where information is gathered about a child or young person or perpetrator, from agencies including:

- Police
- Manx care
- Children's Social Care
- Schools

The CEAM tool will be completed for each of the children coming to the attention of the meeting.

Following the completion of the CEAM tool, there are 6 potential outcomes for children and young people which can be:

Assessed level of risk	CEAM Score	Outcome
No risk - No evidence to believe that a child or young person	0	Action: Information and intelligence is recorded on the Police Intel form. A lead professional is identified to

has suffered harm or is at risk of suffering harm		continue to monitor the risk. Police take tactical disruption activity.
Low risk: Some evidence of risk of or actual harm	0-19	Action: The threshold for an assessment is triggered and (with consent) an assessment will commence. If the withdrawal of parental consent heightens the professional assessment of risk, a strategy meeting will be triggered. Planning for urgent health needs and police investigation or disruption activities will be undertaken.
Medium risk: There is evidence that the child or young person is at medium risk of suffering harm.	20-29	Action: The child or young person is allocated a social worker and progress to the CEAM strategy meeting, chaired by the team manager of Intake and Assessment team. Planning for urgent health needs and police investigation or disruption activities will be undertaken.
High risk: Child or young person is at high risk of experiencing harm	30-39	Action: The child or young person's circumstances are considered in a CEAM strategy meeting, chaired by the team manager of the Intake and Assessment team. Planning for urgent health needs and police investigation or disruption activities will be undertaken. A notification will be sent to the Head of Statutory Social Work Service and Group manager in Children's Social Care.
Very high risk: Child or young person is suffering actual harm	40+	Action: The child or young person's circumstances are considered in a CEAM strategy meeting, chaired by the team manager of the Intake and

		Assessment team. Planning for urgent health needs and police investigation or disruption activities will be undertaken. A notification is sent to the Executive Director of the Department for Health and Social Care and the managers below.
Already known: Information on a child or young person who is already known and has an allocated social worker	--	Action: Pass new information to the team manager and social worker. If the new information suggests a change in risk a new CEAM is completed and consideration of a CEAM strategy meeting, chaired by the allocated social workers' team manager.

Children and Young people coming to the attention of services at the weekends or out of office hours:

Individual children's circumstances will be assessed by the Out of Hours Children Social Care Team. Where the following decisions may be made:

1. Record, alert the Intake and Assessment team and take no further action.
2. Record, undertake a CEAM, share the assessment with the Intake and Assessment team and take no further action.
3. Record, undertake a CEAM, move to CEAM strategy meeting and take immediate steps to safeguard the child.

Increasing harm: The Risk Management Meeting (RMM)

The Risk Management Meeting will take place weekly. It is a multi-agency meeting that considers risks to children and young people at risk of exploitation, including risks from gang association, county lines and modern day slavery. This meeting focuses on the children identified as being at medium, high and very high risk of harm.

This meeting is not a replacement for planning which takes place in CEAM strategy meetings.

The panel has team manager or equivalent representatives from:

- Children's Social Care
- Police
- Education
- Manx care
- CAMHS
- Probation
- Youth Justice
- Early Help
- St Christopher's Children's homes

The purpose of the meeting is to review and reduce the risk to individual children or young people under the age of 18 years. The meeting aims to offer oversight and assurance on risk management plans, offering a reflective space to discuss cases and to discuss any specific barriers to improving outcomes for exploited children. Panel members are charged with the responsibility to:

- ensure interventions are effectively reducing risk or harm.
- ensure that risk management plans are sufficiently responsive to the assessed levels of need.
- ensure perpetrators activity is being actively disrupted.
- identify barriers to the effective protection of children or young people or disruption activity and make suggestions as to how barriers can be overcome.
- escalate any barriers or issues that need consideration by the Strategic Exploitation Group.

The allocated social worker is invited to the panel to report on risks and progress, the details of the current multi-agency plan and or seek advice about potential further interventions where barriers may be experienced.

This meeting is held weekly to ensure a timely response to children or young people where the risk appears to be escalating and/or interventions don't appear to be making the required changes.

The Terms of Reference for this group can be found in Appendix 3.

Strategic oversight: The Strategic Exploitation Meeting

This bi-monthly group considers the strategic and tactical activity to tackle local exploitation. This is done by focussing on trends, patterns, hot spots and locations as well as possible tactical data and

information held at an Island level. The group also have a responsibility to consider and respond to individual or groups where workers are experiencing barriers to protecting children or young people that could not be resolved at the RMM meeting.

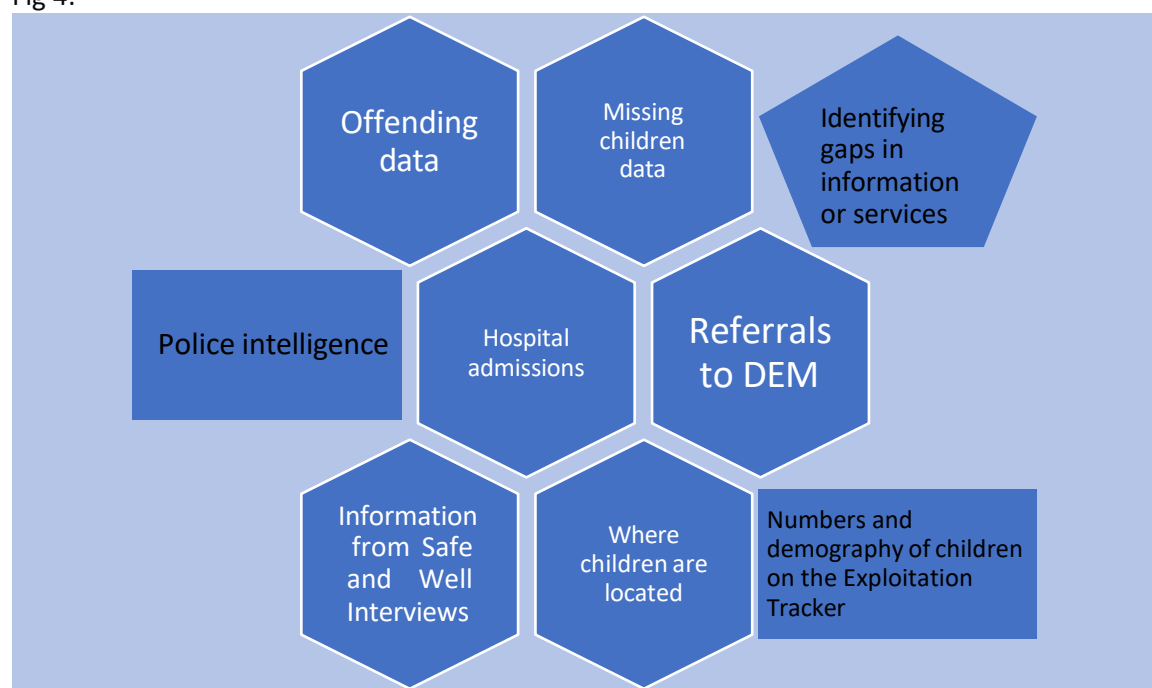
The Group has Senior manager or equivalent representatives from:

- Police
- Manx care
- CAMHS
- Children's Social Care
- Probation
- Youth Justice
- Education

This group focusses on building a local picture of exploitation and parts of the community that are vulnerable to exploitation through bi-monthly data, local learning and intelligence.

Elements that inform the understanding of a local picture:

Fig 4:



This group also holds a quality assurance role in making sure that the Risk Management Meetings are;

- Taking place weekly
- Are quorate
- Considering the right children at the right time
- Fully exploring risk, strength, push and pull factors for children and young people
- Developing effective risk management plans
- Disrupting perpetrator activity

This group reports currently into the Vulnerable Adolescent Task and Finish Group, which in turn feeds into Action and Implementation Panel.

Once the Board is satisfied that the local arrangements are well established the Vulnerable Adolescent Task and Finish group will be replaced by the Strategic Exploitation Meeting, which will report directly into the AIP.

9. Using the CEAM to Support Effective Strategy Meetings and Planning

The CEAM is reviewed at the Strategy meeting when it has been agreed that the threshold for a strategy discussion has been met. The tool will have been partially completed by the DEM team. The tool will be shared with all those present at the meeting. Participants in the meeting will be expected to come with any additional information they hold using the SAFEGUARD mnemonic to guide them.

The strategy meeting will be chaired by the Intake and Assessment team manager.

Once the CEAM strategy meeting has been held and actions agreed, this is stored in 'documents' in the Children's information system. Individual agencies would be expected to record on their recording systems E.g. EMIS, Connect or safeguarding files in schools. Copies of the plan will be shared with attending partners and other relevant professionals that have a part in the safety plan.

It is good practice to involve the young person in safety planning, where this does not compromise their own safety.

Strategy meetings are only as good as the levels of representation they have for the sharing of information and developing plans. It is imperative that all key partners and individuals are present or involved in the strategy meeting. E.g. supervising social worker or residential managers for children looked after.

Effective strategy meetings develop effective risk management plans. Remember that plans should have SMART actions:

S	Specific
M	Measurable

A	Achievable
R	Realistic
T	Timely

Some examples of effective planning are shown in Fig 5:

Fig 5: Action Planning:

Action plan				
Area of need/risk	Desired outcome	Action	By whom	By when
Absence/missing	For us to know where SB goes when she goes missing and any associates.	The foster carer to download the tracking app on SB's phone – with her permission of SB	Foster carer and SB and supervising social worker	31.04.2022
Sexual health	SB to have a Sexual Health screen and treatment if needed. Contact tracing to be undertaken.	SB to be referred to the SARC for evidential /forensic purposes.	Health Practitioner to speak to local SARC Consultant and provide follow up if needed.	Within one week or 01.05.2023
Emotional and Physical condition	For SB not to harm herself when she is feeling low	Social worker to refer to CAMHS for 6 weeks focused intervention	Social worker	Within one week or 01.05.2023
Emotional and Physical condition	For SB to have strategies to prevent her from self-harming	For SB to have access to 6 weeks CBT talking therapy to develop coping strategies around her thoughts of self-harming	Social worker and CAMHS triage	Within one week or 01.05.2023
Gang/criminal activity	To give GL a chance to talk about his worries about perpetrators that were threatening him and his brothers and sisters.	Offer to meet with GL in a safe space (time and place to be identified by GL)	CE police lead, mother, GL and the social worker	Within 3 days or 27.04.2023

10. Professional Disagreement

There are opportunities via the Risk Management Meeting and the Sexual Exploitation Group to raise organisational or systemic barriers that may inhibit our ability to best safeguard children and young people. These might include for example budgetary issues, blockages in information sharing or resource issues.

However, given the complexities of this work, there may also be occasions where there is a professional difference of opinion or disagreement.

Where there is a disagreement about a decision made at a DEM or a Risk Management Meeting, this includes a decision that a child will not be discussed at a DEM or Risk Management meeting – the chair should take steps to ensure that their decision is clearly set out in the child's records or meeting minute.

Should there be continued concerns or disagreements the IOM Escalation Policy should be used. A link to this can be found in Appendix 2.

Appendices

Appendix 1- the CEAM Tool (v20 to 2022)

Appendix 2 – The Isle of Man Escalation Policy

Appendix 3 - Terms of reference for the local arrangements to safeguard children or young people from harm arising from exploitation