

SLOUGH BOROUGH COUNCIL

REPORT TO: Education and Children's Services Scrutiny Panel

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PART I

CHILD TRAFFICKING AND EXPLOITATION

1. Purpose of Report

To inform members about:

- the definitions of child trafficking and exploitation
- national and local roles and responsibilities
- what is known about the extent of child trafficking and exploitation in Slough
- the action being taken address this through partner organisations to identify current issues and inform necessary processes to address child trafficking and exploitation across all partner agencies
- the action being taken to provide a robust and sustainable safeguarding service.

2. Recommendation(s)/Proposed Action

Education and Children's Services Scrutiny Panel is requested to:

- a) Form questions and comments from Scrutiny to be considered by the SLSCB in delivering the Business Plan priority on safeguarding children who are trafficked and exploited.
- b) Take note of the roles and responsibilities of different organisations in respect of child trafficking and exploitation
- c) Recognise the role of the SLSCB in ensuring that work on child trafficking and exploitation is included in the SLSCB Business Plan, including partners accounting for the way in which they carry out their roles and responsibilities towards identifying trafficked or exploited children, and ensuring that necessary services are provided by relevant agencies.

3. Community Strategy Priorities

Health and Well-Being

- By identifying and prioritising services for vulnerable groups in the Slough Population and by targeting support to meet the needs of children and young people

- Through focussing on the needs of the most vulnerable children and young people and their parents and carers in Slough, and providing targeted services through partnership working primarily with the NHS to secure measurable health improvements

Safer Communities

- By offering effective support to families to help them do their best for their children so that children and young people are safe in their families and communities
- By recognising that parents are the main carers for their children, and by offering services that enable them to continue to care for their children successfully so that children can grow up within their own families and communities wherever possible
- By carrying out respective roles across the local authority and partner agencies to ensure that the most vulnerable children in our community are protected from harm and they are enabled to live with their families
- By carrying out our statutory role as a local authority to provide services for children in need, to safeguard them and look after children whose parents are unable to do so
- By working effectively with partner agencies so that they also contribute to safeguarding children and young people and demonstrate improved outcomes for those children and young people and their families
- By ensuring that children and young people who are looked after have the standards of care and life opportunities that we would want for our own children with contributions from all partner agencies

Economy and Skills

- By offering early education and family support to parents of young children so that they can focus on meeting their children's needs and overcoming personal and family difficulties that affect their ability to care for their children
- By promoting educational achievement which gives children and young people in care and leaving care enjoyment in learning and increased opportunities for success in adult life
- By maintaining high levels of Education, Employment and Training (EET) for young people who are looked after beyond 16 years of age.
- By promoting vulnerable young people's social and emotional development alongside advances in educational achievement

4. Other Implications

a) Financial

Slough Borough Council's budgets for Early Intervention, Safeguarding and Children Looked After include the provision of services for children and young people who have been trafficked and exploited.

The SLSCB budget comprises contributions from partner agencies, and is used to carry out the SLSCB Business Plan and associated work.

b) Risk Management

Recommendation	Risk/Threat/Opportunity	Mitigation
Further multi-agency work needs to be carried out through the SLSCB to ensure all partners in Slough are aware of the risk to children who might be trafficked and/or exploited; are able to identify signs of that, and report it appropriately.	Children and young people who are not recognised as trafficked or exploited continue to be at risk of serious significant harm.	All partners working to SLSCB Business Plan requirements to recognise children and young people in this group; draw up and implement the Action Plan on Child Sexual Exploitation required by DfE.
Ensure that the SLSCB Business Plan and the operational work of partners fulfil Ofsted grade criteria for 'good'/'outstanding'.	Ofsted will be including child trafficking and exploitation in future unannounced inspections of safeguarding and looked after children and assessing the impact of multi-agency services in prevention and protection.	Use the clear, written multi-agency approach in the Berkshire Child Protection Procedures to ensure consistency of practice.

c) Human Rights Act and Other Legal Implications

There are no human rights or legal implications arising from this report.

d) Equalities Impact Assessment

Assessment to be carried out based on the SLSCB Business Plan.

e) Workforce

Child trafficking and exploitation is covered in Safeguarding Training.

In addition, in January 2012, three members of staff and one foster carer from SBC attended a two day specialist course run by Barnado's.

Supporting Information

5.1 Background

This report details the definitions of child trafficking and exploitation; the roles and responsibilities of partner organisations and the known extent of child trafficking and exploitation in Slough.

The clandestine nature of child trafficking and exploitation acts as a significant obstacle to producing a document that outlines, assesses and quantifies the levels of these offences in Slough, and the harm to children and young people as a result. This report gives the range of publicly available information on the subject.

There is explicit guidance about safeguarding children and young people who may have been involved in trafficking and exploitation in the Berkshire Child Protection Procedures <http://berks.proceduresonline.com/index.htm>

5.2 Definitions

Child trafficking (for exploitation, which may be sexual)

Article 3 of the Palermo Protocol states:

5.2.1. "Trafficking in persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation or prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.'

'The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered "trafficking in persons" even if this does not involve any of the means set forth above.' Under the Palermo Protocol it is irrelevant whether a child has consented to their transportation or not.

Child sexual exploitation (which may involve trafficking)

The sexual exploitation of children and young people is a form of child sexual abuse. Safeguarding Children from Child Sexual Exploitation (DfE 2009) describes sexual exploitation as follows:

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources.

Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

5.3 International and national legislation, policy and guidance

- The Palermo Protocol – see above
- Tackling Child Sexual Exploitation: Action Plan DfE Dec 2011
- Working Together to Safeguard Children 2010
- Safeguarding Children and Young People from Sexual Exploitation: Supplementary Guidance to Working Together 2009
- Safeguarding Children who may be trafficked – practice guidance 2011
- The Munro Review of Child Protection 2011
- CEOP Thematic Assessment 'Out of Sight, Out of Mind'; Breaking Down the Barriers of Child Sexual Exploitation' 2011
- Puppet on a String – the urgent need to cut children free from sexual exploitation, Barnado's 2011
- Reducing the risk, cutting the cost: Barnado's Research Briefing 2011

The Department for Education national action plan for tackling child sexual exploitation, published on 23rd November 2011 brings together actions by government and a range of national and local partners to protect children from this largely hidden form of child abuse, which has a higher incidence in more vulnerable children and young people. Sexual exploitation of children and young people under 18 can involve gangs or individuals luring them into performing sexual activities in exchange for gifts. It can also happen through the use of technology, for example, computers and mobile phones. The DfE Action Plan outlines government's intentions to safeguard children and young people from sexual exploitation, and describes the roles of all partners in tackling this crime. It describes roles at government and local level, including the key responsibility of the SLSCB for ensuring that the relevant organisations in each local area co-operate effectively to safeguard and promote the welfare of children.

5.4 Roles and responsibilities

Slough Local Safeguarding Board (SLSB)

Operating Frameworks with which SLSCBs must work

- 5.4.1. Chapter 6 of 'Working Together to Safeguard Children sets out a range of supplementary guidance that is intended to address the safeguarding needs of specific groups of children that may be at risk. This includes specific guidance on child trafficking and child sexual exploitation alongside a range of other, sometimes related, issues such as children affected by gang activity, complex organised or multiple abuse, forced marriage and honour based violence. Specific expectations of SLSCBs are set out in this chapter in relation to both child sexual exploitation and child trafficking.

a) **Child Sexual Exploitation**

Working together states that: 'Every Local Safeguarding Children Board (SLSCB) should assume that sexual exploitation occurs within its area unless there is clear evidence to the contrary'. There is an expectation that each SLSCB will put in place systems to monitor prevalence and responses.

In addition the DfE (then DCSF) published guidance in June 2009 on *Safeguarding Children and Young People from Sexual Exploitation*.

The guidance states that SLSCBs should ensure that specific local procedures are in place covering the sexual exploitation of children and young people.

In November 2011 the DfE published 'Tackling Child Sexual Exploitation: Action Plan' which has set out expectations of a range of organisations including SLSCBs. The actions relating to SLSCBs are incorporated into the SLSCB Business Plan 2012-15 and are referred to below.

b) **Child Trafficking**

The DCSF and the Home Office published joint guidance entitled '*Safeguarding children who may have been trafficked*' in December 2007. It sets out a comprehensive strategy to improve the identification and safeguarding of child victims of trafficking. DfE guidance on sexual exploitation and young runaways includes details of how services must work to protect children from trafficking.

A child trafficking assessment toolkit has been designed to help front line staff identify children who may have potentially been trafficked as part of a new National Referral Mechanism (NRM). The NRM is a multi-agency framework designed to enable frontline practitioners to work together to identify and support victims of trafficking.

Working Together states that SLSCBs should be aware of the child trafficking agenda within their local authority and ensure all suspected child victims of trafficking are referred through the NRM using the correct procedure.

SLSCBs should also identify trafficking co-ordinators who can ensure a co-ordinated campaign of information-sharing to support the safeguarding agenda between local authorities, police and the NRM Competent Authorities to ensure a full picture is provided on child NRM referrals and secure the best safeguarding outcome for the child.

The NRM and the 2009 procedures were implemented by Slough and are included in the on line Berkshire Child Protection Procedures.

5.4.2. Slough Local Safeguarding Board

The SLSCB has taken steps to ensure that the requirements of Working Together and associated supplementary guidance have been followed.

In the light of concerns expressed locally and in some national media of a perception that the prevalence of trafficking and child sexual exploitation was rising, the SLSCB has, as it should, begun to review the position, seek data and information to assess prevalence and consider whether steps needed to be taken to review local arrangements and their effectiveness. To this end Child Trafficking and Child Sexual Exploitation has featured on the agenda of the last two meetings of the former Executive Board of the SLSCB. In addition, the interim Independent Chair has held meetings with key personnel from both Slough Borough Council and the Thames Valley Police to determine whether additional action needs to be taken to address child trafficking and child sexual exploitation.

The publication of the DfE Action Plan on Child Sexual Exploitation has further focused the SLSCBs attention on this matter. The outcome of these deliberations has been to include child trafficking, child exploitation and child sexual exploitation as priorities within the SLSCB Business Plan 2012-15. These priorities appear within Priority 2 of the new Business Plan 'Targeting Areas of Risk in Slough'.

The actions agreed within the Business Plan for each of the three areas of risk – child trafficking, child exploitation and child sexual exploitation are as follows:

- To map the level of need in Slough to secure an accurate picture of the level of prevalence – it is intended that this mapping will be repeated regularly to ensure the picture is kept up –to-date;
- Include in the SLSCB scorecard data reporting that enables the SLSCB to monitor ongoing prevalence and responses to reported incidents;
- Develop an effective local strategy ensuring there is a co-ordinated multi-agency response to incidents;
- Increase understanding of these issues in the professional and wider community – with a view to securing both better recognition of children that may be victims of trafficking, exploitation or sexual exploitation, earlier detection and earlier intervention;
- To safeguard and promote the welfare of groups or children who are potentially more vulnerable by:
 - Ensuring effective communication between partner agencies on the SLSCB;
 - Increasing personal knowledge amongst staff across the statutory, voluntary and private sectors working with children and young people;
 - Providing briefings to social care teams;

- Ensuring multi-agency training days

These actions reflect the expectations of SLSCBs as set out in the DfE Action Plan. In addition, when management information and data has been analysed to assess prevalence the SLSCB will consider, if required, establishing a short life 'Task and Finish Group' that will determine whether changes to existing policy, procedures and practice are necessary.

It will also be important to ensure that the Slough SLSCB engages in discussions with SLSCBs in neighbouring authorities with a view to securing coherence and consistency in local approaches and agreeing arrangements for any cross-boundary issues that might need to be addressed.

5.4.3. Police

The need for protective and preventative action on child trafficking and sexual exploitation will depend on the immediacy of the circumstances that the officers or staff are presented with when responding to an incident or crime. Established standard operating procedures exist within TVP to deal with initial and subsequent actions and are co-ordinated by the Police Enquiry Centres when a non emergency call is made to the police, and by police control room operators when a 999 call is made. This may include the arrest of suspects when it is proportionate and necessary to do so and also include the use of Police Protection Orders where there are immediate concerns for a child's safety.

TVP's role is to deal with situations that arise in Slough, or concern Slough residents. Other police forces, including the Metropolitan Police, British Transport Police, and Essex Police, who become involved in cases linked to Slough residents, are expected to refer back to TVP concerning Slough residents.

TVP Force Intelligence Bureau has a human trafficking desk dedicated to intelligence in that arena.

5.4.4. Serious Organised Crime Agency (SOCA) and the UK Human Trafficking Centre

SOCA tackles serious organised crime that affects the UK and our citizens. This includes Class A drugs, people smuggling and human trafficking, major gun crime, fraud, computer crime and money laundering.

The UK Human Trafficking Centre (UKHTC) is a multi-agency organisation led by SOCA. Its role is to provide a central point of expertise and coordination in relation to the UK's response to the trafficking of human beings (THB).

The Centre seeks to facilitate a coordinated, cooperative and collaborative way of working within the UK and internationally. Its work to combat THB and provide victim-centric support covers three key inter-linked areas; prevention; protection and prosecution.

The Centre's latest summary information from October 2011 summarises the current known information as follows:

In total, 202 children have been identified as trafficked into and within the UK over the period 1 January 2011 to 15 September 2011. This figure includes referrals made to the National Referral Mechanism and referrals received by the Child Trafficking Advice and Information Line (CTAIL), operated by the NSPCC.

- 67 children from African countries have been trafficked into the UK over this period. This includes 29 victims from Nigeria, mostly girls trafficked for the purposes of sexual exploitation.
- 63 children from Asian countries have been trafficked into the UK over this period. This includes 48 victims from Vietnam, mostly boys trafficked for the purposes of labour exploitation and cannabis cultivation. However, the number of Vietnamese minors exploited in cannabis farms appears to have decreased slightly from previous assessments. It is likely that Vietnamese organised criminal groups find it increasingly difficult to operate in the UK cannabis market, as a result of continued law enforcement efforts to combat cannabis farms.
- 50 children from Eastern European countries have been trafficked into the UK over this period. This includes 10 victims from Bulgaria, 23 from Romania and 12 from Slovakia, trafficked mostly for the purposes of benefit fraud and criminal exploitation.
- 4 victims from China have been identified. This represents a significant decline in the number of children trafficked from China to the UK.

5.4.5. Crown Prosecution Services

The Crown Prosecution Service is the principal public prosecution service for England and Wales, and is headed by the Director of Public Prosecutions. They frequently work in collaboration with a number of domestic and international agencies and non-government agencies due to the global nature of human trafficking and exploitation. These cases tend to be serious, complex and require sensitive handling. They are most likely to be dealt with by specialist prosecutors with specific training and expertise.

5.4.6. Local Authority

Through social care services, the local authority has a responsibility to provide services to children 'in need' and those who are suffering, or at risk of suffering significant harm. These may include children who are trafficked and/or exploited.

Within local authority children's services, children and young people may also be identified as needing other support services including early intervention and services related to their educational needs.

The local authority also has responsibilities relating, for example, to adult services, housing, payment of benefits and community services. They may identify trafficked or exploited children through the provision of these services, or be responsible for providing support to children, young people and their families following incidents.

5.4.7. Schools

Schools are in a position to identify children and young people who are trafficked or exploited through their knowledge of children's home circumstances. If they do suspect that a child or young person is being trafficked or exploited, they are required to report this to the police or children's social care.

5.4.8. Health

Health services, including health visitors, GP's, the Walk In Centre and hospitals are in a position to identify children and young people who are trafficked or exploited through information about the child or young person's health or home situation. . If they do suspect that a child or young person is being trafficked or exploited, they are required to report this to the police or children's social care.

5.5 Known information about child trafficking and exploitation in Slough

5.5.1. In 2007, the Metropolitan Police led 'Operation Golf' which was set up to tackle the increasing number of cases of children begging and stealing in central London. This was followed by 'Operation Caddy' which was also led by the Metropolitan Police. Operation Golf provided TVP with information about one child in Slough. Operation Caddy led to concerns about ongoing safeguarding issues in Slough. In early 2008, this led to 24 arrests, 17 houses being searched, and 10 children taken into short term protective care, with 9 of them being satisfactorily returned to their families. In the other case, two offenders were sentenced to prison, the other found not guilty.

5.5.2. In October 2011, the area of child safeguarding was highlighted in the Panorama Programme 'Britain's Child Beggars' which featured Romanian children and adults begging on London streets, and identified two families as coming from Slough. The filming of this programme took place from December 2010 to September 2011, and at no point did the producers contact TVP or children's social care in Slough about their concerns about the children involved. The DCS followed up the programme's allegations with the producer and was given details of the children concerned, but both police and social care found that the families had left the addresses that Panorama had supplied. Since the Panorama programme both Cllr Stokes and retired Superintendent Bernie Gravett (who was involved in Operations Golf and Caddy) have raised the problem of trafficking and exploitation in Slough without providing any substantive evidence.

- 5.5.3. Across the TVP area, there have been 22 reports of trafficking for sexual exploitation since 1st April 2007 to the present day, none of which involved children. A further 7 reports were about trafficking with non sexual exploitation. 2 of these were in Slough. In a number of cases people questioned or arrested have given false identities or addresses.
- 5.5.4. Following the Panorama programme, for 2 3 week periods before and after Christmas 2011, Slough Police and British Transport Police monitored rail travel for groups of Romanian travellers using the rail network. On three dates, groups were observed travelling by rail, and on one date, a group of women were stopped for begging. This tasking continues, but on current evidence, the transportation of children to other parts of the UK using the rail network appears to be limited.
- 5.5.5. In 2011, police intelligence identified 10 teenage girls in Slough who were possibly being sexually exploited by a group of boys and young men. The Engage Project, which is a collaboration between Social Care and IYSS has been set up to address this issue and aims to empower young people involved in sexual exploitation through intensive 1-1 work, volunteering activities in the community, a sense of self awareness and pride, and an appreciation of others. The project is raising awareness amongst young women and providing emotional support to those already involved, whilst also educating young men about this sexually abusive practice.
- 5.5.6. Schools experience high levels of pupil mobility in Slough, and much of this is connected with families moving in and out of Slough for work, housing and family reasons, which results in children changing school.
- 5.5.7. Schools are in a key position to identify children and young people who may be trafficked and/or exploited. School attendance at primary school is improving to national levels, and at secondary schools is above national levels. Prolonged absences from school are followed up by schools and through the school attendance team. There is no obvious link between school absence and trafficked or exploited children, but children missing school are assiduously followed up through the school attendance team.
- 5.5.8. In relation to the Panorama programme, a review of school attendance for children from the Roma community shows that among families living in the town, there has been improving attendance over recent years. There are, however, extended absences for some children in September/October when families travel back to Romania for a cultural fair. Attendance at this point in 2011-12 at one school was 65%, compared to over 90% for the rest of the academic year.
- 5.5.9. There are no health services specifically for trafficked and/or exploited children. Families who are mainly transient or very mobile are difficult to track and may have a higher risk of exploitation. Migration may be between local accommodation, different towns, sectors and cities. Health care for children and families who are hard to reach may be provided through GP surgeries, the Slough Walk-in Centre and GP service, or

hospital Accident and Emergency Departments. The health visiting service provides a universal service to all children and families and may be the only people in regular contact with vulnerable communities, especially as many of the families do not use preventative health services. Where children are known to have been trafficked or exploited, if necessary, they can be referred to specialist services relevant to their needs.

5.6 Current actions to examine the extent of child trafficking and exploitation in Slough

- 5.6.1. Within TVP work is continuing to examine the extent of trafficking and exploitation including: monitoring people leaving Slough on the rail network; intelligence checks from the Westminster area of the Metropolitan Police, British Transport Police, Essex Police and London Underground. Scanning of threat and harm is regularly carried out as part of TVP routine business. Both local processes and those at a force level routinely scan and respond to immediate threat and emerging need. Following the Panorama programme and an FOI request to TVP, Slough Local Police Area have undertaken additional intelligence collection exercises in relation to the safeguarding of children, specifically those who may have been subject to Child Trafficking and Child Sexual Exploitation. A number of intelligence and information streams have been researched to provide a clear picture of what is known at this time in relation to both subjects. Current information suggests that Slough does not have any recent, specific, identifiable threat to child safeguarding in relation to child trafficking. Where identities of vulnerable groups are known, there are actions in place to investigate and support as appropriate.
- 5.6.2. Following the Panorama programme, the Metropolitan police have produced a profile of the begging issues, and will be following these up, including the links to Slough.
- 5.6.3. TVP have responded to the Office of the Children's Commissioner call for evidence in relation to child sexual exploitation. TVP have profiled the force position and there is no indication at this time of a current issue in Slough. However, the reporting of child sexual exploitation is sparse, and scrutiny of the police recording systems shows very few crimes reported. 'Sexual exploitation' is not a defined category for recording police incidents or child protection registration due to its complex make up. More needs to be done on investigating the prevalence of Child Sexual Exploitation, as information and intelligence from around the country together with government action plans shows that child sexual exploitation is more prevalent than first thought, and a multi-agency agenda needs to be adopted to work with those at risk, predominantly vulnerable young females in care and young people who repeatedly go missing, as described in 5. 4

5.7 Investigation into Exploited and Trafficked Children and support for them following identification.

- 5.7.1 Where an exploited or trafficked child comes to the attention of the police, they have the power to use Section 46 of the Children Act 1989 to remove the child to suitable accommodation or prevent the child's removal from hospital or any other place where s/he is being accommodated (Police Protection Order). They may also arrest a suspect when it is proportionate and necessary to do so.
- 5.7.2 If the police remove a child under S46, they have a duty to inform the local authority in whose area the child has been found, through the Protecting Vulnerable People Hub.
- 5.7.3 Further action will depend on the nature and seriousness of the offence. Where it is suspected that a child has been trafficked and/or exploited the Child Investigation and Abuse Unit are likely to take the lead with Children's Social Care in convening a strategy meeting to discuss further action to safeguard the children as outlined in 'Working Together 2010' and the Berkshire Child Protection Procedures. In some cases there may be no further action. However, in cases where there are concerns about safeguarding, the child may be subject to a child protection plan, or, in some cases, taken into care.
- 5.7.4 Three members of staff from Children's Social Care and a foster carer attended training on Child Trafficking and Exploitation run by Barnado's in January 2012.

5.8 Next steps

- 5.8.1 Further work to be carried out through SLSCB partner agencies in awareness raising and identification of children and young people who are trafficked or exploited.
- 5.8.2. To ensure recognition of child trafficking and/or exploitation , TVP have incorporated an updated procedural process in the Protecting Vulnerable People referral hub in Reading which risk assesses all child abuse reports. This will facilitate the different reporting protocols between the Metropolitan Police and TVP, and make information available for multi-agency groups.
- 5.8.2. The SLSCB has included Child Trafficking and Exploitation in the Business Plan, and will be following the DfE Guidance on Child Sexual Exploitation to draw up a local response as set out above.
- 5.8.3 All partner organisations are committed to safeguarding children in Slough. The police are actively seeking the necessary detail to define the precise local issues. Working with partners, they will continue to assess and understand the current intelligence picture and will explore any available opportunities to combat child abuse in any form.

6 Conclusion

Key partner agencies in Slough have a vital part to play in raising awareness of, preventing and identifying children and young people who might be vulnerable to trafficking or exploitation or are known to have been trafficked and exploited. The SLSCB has a responsibility to oversee this work, and it is included in the SLSCB Business Plan as a key priority. Each individual agency within the SLSCB has a responsibility to carry out their role to safeguard children and young people.

7. Appendices

None

8 Background Papers

Palermo Protocol http://www.unodc.org/pdf/crime/a_res_55/res5525e.pdf

Berkshire Child Protection Procedures
<http://berks.proceduresonline.com/index.htm>