SAY SOMETHING IF YOU SEE SOMETHING

Sexual exploitation is abuse and a crime.

If you think it is happening here talk to your supervisor or call Crimestoppers: 0800 555 111

WATCH FOR: a lot of male visitors to one room. A party room with lots of men, girls, drugs and alcohol. A lot of condom wrappers in the bin. Men paying with cash.

www.hertssafeguarding.org.uk
## CONTENTS OF CAMPAIGN PACK – ‘HOW TO USE’

<table>
<thead>
<tr>
<th>Item</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Letter to LSCBs</td>
<td>Introduction to the campaign pack, containing useful information on how to deliver the campaign locally, partnership engagement and resourcing</td>
</tr>
<tr>
<td>Editable Posters (including Home Office, RASG, West Midlands, Sheffield)</td>
<td>For businesses to display at their premises to make the public aware of operating policies in place to prevent underage alcohol sales, proxy supply of alcohol to children To remind/encourage staff working at the premises to be vigilant and report concerns To focus staff attention on the age of younger looking customers to consider / monitor their activity and safety</td>
</tr>
<tr>
<td>Leaflets</td>
<td>For use in staff training / induction packs</td>
</tr>
<tr>
<td>Trafficking Door Hanger</td>
<td>For hotels and businesses to display at their premises to raise awareness to the public and staff of trafficking issues and provide useful contact details</td>
</tr>
<tr>
<td>Letter template to local businesses</td>
<td>To introduce the campaign and set out reasons why they should engage with it</td>
</tr>
<tr>
<td>Briefing Paper</td>
<td>Template briefing paper for local campaign leaders to distribute to traders, informing them of the purpose of the pack</td>
</tr>
<tr>
<td>Model Strategy</td>
<td>An example strategy for delivering the campaign locally, including a step by step guide of actions required from partner agencies</td>
</tr>
<tr>
<td>Hotel trigger plan</td>
<td>An explanation of what actions a local police constabulary may be required to take if an incident is reported by hotel staff</td>
</tr>
<tr>
<td>List(s) of indicators x 3 (businesses &amp; hotels)</td>
<td>To assist with staff training so that staff know what kind of activity might be a sign that CSE is taking place These may also be used on staff notice boards as a ‘checklist’ or aide memoire</td>
</tr>
<tr>
<td>Training pack including case studies, activities and indicators</td>
<td>Materials which can be used or adapted to deliver CSE awareness. The pack may be used by hospitality trade organisations or by statutory or voluntary agencies involved in delivering CSE training. Information may need to be inserted / amended according to local authority or local business policies.</td>
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</tr>
<tr>
<td>Training Reply Slip</td>
<td>To be issued by Local Authorities/Campaign lead agencies so that businesses can confirm the number of staff attending CSE training sessions offered.</td>
</tr>
<tr>
<td>Information sharing forms x 3</td>
<td>To provide an audit trail and record of due diligence when staff report CSE concerns to the police To ensure staff record the type of information required by the police in order to assess/investigate</td>
</tr>
<tr>
<td>Vetting and recruitment checklist</td>
<td>A guide about what to consider when recruiting staff / volunteers if children and young people access the premises</td>
</tr>
<tr>
<td>Code of Conduct</td>
<td>A suggested code of good safeguarding practice for use by employers where shop or delivery staff come into contact with children and young people. Local businesses should be encouraged to use the code as part of the staff induction programme and retain records as part of their ‘due diligence’ that staff understand and will observe the code of conduct.</td>
</tr>
<tr>
<td>Guidance for Operators</td>
<td>A guide for employers where shop or delivery staff come into contact with children and young people to ensure adequate controls and auditable information is available in relation to employees / volunteers. This document relates to the ‘Code of Conduct’ referred to above.</td>
</tr>
<tr>
<td>Risk Assessment Exercise</td>
<td>This can be used as a training exercise or can guide the type of issues that should be considered in the business’ risk assessment to prevent CSE at the premises.</td>
</tr>
</tbody>
</table>
| Record of unaccompanied child/young person under the temporary supervision of premises staff | Is a model protocol to be followed if staff at a premises are responding to a vulnerable child/young person who is not accompanied by an adult.  
(ii) Is a record of any issues arising and actions taken by staff in situations involving interventions with persons under the age of 18 at the premises. These documents provide a guide towards procedures to ensure that vulnerable young people are responded to by staff in a safe and appropriate manner. This type of protocol also ensures that the premises has an audit trail of actions taken in response to an unaccompanied vulnerable young person. The form should be retained as part of the due diligence records. |
<table>
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<tr>
<td>Criteria for a recognised proof of age scheme</td>
<td>A guide for businesses selling age restricted goods or where age restrictions are in place for admission to a premises (eg night clubs, sexual entertainment venues) to ensure that a robust, consistent and auditable system is in place. These systems if operated would be evidence of ‘due diligence’ by the business.</td>
</tr>
<tr>
<td>Refusals log</td>
<td></td>
</tr>
<tr>
<td>Patrol log</td>
<td>This may be used to record foot patrols of a premises that does not have CCTV or other monitoring systems in place. Records should be retained as part of the premises management’s due diligence records.</td>
</tr>
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</table>
SAY SOMETHING IF YOU SEE SOMETHING

National Campaign - Tackling Child Sexual Exploitation

“Sexual exploitation is not limited to particular geographical areas and all LSCBs should assume that it is an issue in their area.” (Safeguarding Children and Young People from Sexual Exploitation, HM Government, 2009)

Information for practitioners
The NWG Network has devised this prevention campaign pack in partnership with the Children’s Society and Sheffield LSCB. This campaign pack contains tools and resources that will enable you to raise awareness and provide advice to local businesses on the very sensitive issue of Child Sexual Exploitation.

Introduction
We acknowledge that the response and approach to tackling child sexual exploitation varies from one area to another, but what is consistent is the fact that young people are being groomed, trafficked and exploited in our local hotels, takeaways, shopping malls and other premises. It is for this reason that we felt it important to devise this pack for LSCBs and practitioners. Different local authority areas have different working practices and processes when it comes to safeguarding children and young people from sexual exploitation and many areas are at different stages in their response to CSE. For this reason, we recommend that this pack be used in a way that suits your particular response and your working practices. The tools that have been developed can be tailored in order to localise the campaign and make it more relevant for your area.

Why should you adopt this campaign?
As mentioned above, evidence shows1 that vulnerable young people are being groomed, trafficked and sexually exploited in our shops, cafes, hotels and other premises. It is our responsibility to ensure that we do all we can to protect and safeguard these young people from this horrific abuse.

The National Action Plan, ‘Tackling Child Sexual Exploitation’ which was published by the Department for Education (DfE) in November 2011, states that LSCBs must “increase understanding of child sexual exploitation, in the… wider community (for example contributing to public campaigns)…based on agreed messages and materials”

This national campaign has been recognised and endorsed by the Department for Education (DfE), the Centre for Social justice and Ofsted as good practice. The NWG would urge your LSCB to adopt it, to ensure that we are delivering a nationally consistent message in relation to child sexual exploitation.

By adopting this campaign, you will be better able to protect and safeguard young people by ensuring you have a healthy licensing regime. This pack will enable you to ensure that you are licensing credible and safe businesses, protecting the local economy and safeguarding the reputation of the licensing authority.

www.hertssafeguarding.org.uk
Who should deliver this campaign?
We have already acknowledged that processes and responses differ in each area. In many areas, it is the Local Safeguarding Children’s Board that may lead on this type of work but in some areas it may be a different lead agency. We recommend that practitioners with suitable specialist knowledge of CSE deliver the campaign in your local area either from the statutory or voluntary sector. We do however suggest that a multi agency approach is adopted and that all relevant partners and key stakeholders are notified and consulted to ensure that relevant referral pathways and safeguarding measures in place should a disclosure be made.

Once a lead officer has been appointed to coordinate this work, their contact details should be included as a point of contact on the template letter which is distributed to local businesses (template letter included in pack)

Partnership Engagement
We recognise that this can be a challenging issue but it is important that there is a partnership approach to delivering this campaign. You may wish to engage for example, your LSCB, the community safety partnership, licensing bodies, environmental health and the police. This is not an exhaustive list but simply a recommendation of which agencies you wish to begin partnership working with to deliver this.

Resourcing
We recognise that due to current funding constraints, you may be unable to attract additional resources to roll this campaign out locally. However, with effective partnership working and the use of existing structures, i.e. community safety partnership or LSCB sub group, you may be able to develop a core team of workers that are willing and able to devote some working time to tackle this nationally recognised issue. We must consider working collaboratively and imaginatively in order to achieve effective engagement.

You may wish to consider engaging your local business partners in order for them to contribute to the campaign, i.e. providing venues for training, consultation and ‘train the trainer’ volunteers. You may improve vigilance and information sharing simply by training partner agencies to report their concerns. Don’t forget to include your voluntary sector partners, as they are often in a unique position to contribute time and resources. It may also be worth engaging bodies such as the Chamber of Commerce, the Hoteliers Association and Pubwatch, to raise awareness of CSE and promote collaborative working.

Contents of campaign pack
- Posters
- Leaflets
- Letter template to local businesses
- Information recording/sharing log
- Lists of Indicators of CSE
- Training pack including case studies and activities
- Vetting employees and volunteers risk assessment checklist
- Code of conduct
- Guidance for operators/premise Licence Holders
- Risk Assessment Exercise
- Record of unaccompanied child under temporary supervision of premises staff

www.hertssafeguarding.org.uk
Criteria for a recognised proof of age scheme
Refusals log
Record of interventions
Patrol record
Reply slip for training

Relevant legislation and national guidance
Please refer to:
- Working Together to Safeguard children and young people from sexual exploitation 2009 – Supplementary guidance to Working Together
- Licensing Act 2003

Useful Contacts
NWG Network www.nwnetwork.org
The Children’s Society www.thechildrensociety.org
Crimestoppers www.crimestoppers-uk.org
Missing People www.missingpeople.org.uk
Barnardos www.barnardos.org
Childline www.childline.org.uk
The Child Exploitation and Online Protection (CEOP) Centre www.ceop.gov.uk
The NSPCC National Child Trafficking Advice and Information Line (CTAIL) www.nspcc.org
PACE Parents against sexual exploitation www.paceuk.info/support-for-parents/
ECPAT UK www.ecpat.org.uk
International Centre for the Study of Sexually Exploited and Trafficked Young People www.beds.ac.uk/research/iasr/intcent
NSPCC Inform www.nspcc.org.uk/Inform
ThinkUKnow www.thinkuknow.co.uk
The Sex Education Forum ncb.org.uk/ef
UK Human Trafficking Centre www.ukhtc.org

Please contact the NWG Network for any more information or assistance:

Tel: 01332 585371
http://www.nwnetwork.org/
https://twitter.com/NatWorGroup
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www.hertssafeguarding.org.uk

Hertfordshire Constabulary
Halo

www.hertssafeguarding.org.uk

NWG Network
Tackling Child Sexual Exploitation
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www.hertssafeguarding.org.uk
Using Fake ID?

IF YOU’RE CAUGHT OUT

YOU’RE KEPT OUT

If you’re caught using fake, or someone else’s ID you could have it confiscated and be prosecuted.

Attempting to enter these premises with ID that you know includes false information, or ID that belongs to another person, is an offence and you may be prosecuted under section 2 of the Fraud Act 2006.
It is a criminal offence to buy alcohol on behalf of a child. You could face a £5000 fine and imprisonment for up to 3 months.

D-RINKWARE.CO.UK
UNDER 25?
Please be prepared to show proof of age when buying alcohol

Acceptable forms of ID:
- Cards bearing the PASS hologram
- Photographic Driving Licence
- Passport

D-RINK AWARE.CO.UK

RASG
Retail of Alcohol Standards Group

HERTFORDSHIRE
CONSTABULARY

Halo

HERTFORDSHIRE
safeguardingchildren
BOARD

www.hertssafeguarding.org.uk
WE ACCEPT THE FOLLOWING VALID PHOTO-ID AS PROOF OF AGE

When you see the PASS hologram logo you can be confident that it is valid photo-ID.

Follow these steps to check the validity of photo-ID.

STEP 1 - Check the Photograph. Is it the cardholder?
STEP 2 - Check the Date of Birth.
STEP 3 - Check the ID document. Has it been tampered with?
STEP 5 - Check the Person. Are you satisfied? If not, ask to see additional photo-ID as proof of age.
WHERE TO GET HELP AND INFORMATION

Call 101 asking for your local force. If your call is an emergency call 999

If you wish to remain anonymous, but have information to give, please call crimestoppers on

WEST MIDLANDS CRIMESTOPPERS
0800 555 111

WORKING IN PARTNERSHIP TO STOP CHILD SEXUAL EXPLOITATION

www.nwgnetwork.org
www.twitter.com/NatWorGroup

Working in collaboration with partners to protect vulnerable children from sexual exploitation by early intervention, reducing the number of repeat missing episodes and bringing offenders to justice.

RISK INDICATORS

- Change in physical appearance
- Bruising or other physical injuries
- Chronic fatigue
- Alcohol / drug abuse
- Self-harming behaviour
- Mood swings
- Sexuality active
- Known sexual relationship with inappropriate aged person(s) (current or past)
- Reports from reliable sources suggesting likely sexual exploitation
- Disclosure of sexual / physical assault followed by withdrawal of the allegation
- Repeat sexually-transmitted infections, pregnancy and terminations
- Truancy from school
- Distancing themselves from their friends and usual activities
- Persistently going missing from home or care
- Recruiting others into exploitative situations
- Association with / going missing with other young people who are known to be, or who have been sexually exploited
- Evidence of vulnerability through the internet and/or social networking
- Desperate behaviour to get out of their home
- Wearing inappropriate clothes
- Possession of money, new clothes, jewellery or other items with no obvious means of obtaining them
- Having unusual items in their possession – e.g. train tickets, hotel receipts, mini shampoo etc. from hotels, new or different mobile phone
- Entering / leaving vehicles driven by unknown adults
- Suspicious behaviour of unknown adults hanging round outside their home
- Secretive relationships with unknown adults
THE SEXUAL EXPLOITATION OF CHILDREN

Child sexual exploitation can involve swapping sexual activity for drugs, alcohol, cigarettes or other gifts and presents. It may involve having sex for money with several adults. Youngsters may feel that they must have sex or perform sexual activity because an adult gives them something, or because they feel threatened or frightened.

The sexual exploitation of children is often carried out by older individuals. These individuals target and groom the victim(s), forcing or manipulating them into taking part in sexual activities.

It’s a form of sexual abuse that often involves a form of payment, which can include money, mobile phones, drugs, protection and affection.

In all cases, the offender(s) has complete control, using their age, physical strength and intellect to help exploit the victim.

The use of violence and other forms of intimidation by the offender is common, particularly as the abuse continues.

The victim is often powerless to recognise the exploitative nature of the relationship, because of the grooming process used by the offender and the victim’s vulnerability. The victim may not see themselves as being the victim, especially at the beginning of the relationship.

Children and young people do not volunteer to be sexually exploited. They cannot consent to their own abuse; they are forced.

HOW CAN I STOP THIS?

- Familiarise yourself with, and raise awareness of the list of risk indicators (this is not an exhaustive list and is intended as a guide)
- Identify children who you think could be at risk and observe them for any signs of grooming and / or exploitation
- Report any information that you think could be relevant to the police, Crimestoppers or charitable organisation. You could be helping to disrupt criminal activity
- Educate children regarding the risks
- Work with parents to highlight risk, provide advice and support them

I'M WORRIED ABOUT A CHILD. WHAT SHOULD I DO?

If at any time you believe a child is, has been, or could be in danger e.g they are missing and you believe they are with the person(s) exploiting them, you must do something. It may not be easy to find out details of what is going on but find out as much information as you can and, in any case, call the Police immediately on 101 or 999

- Encourage an open, non-judgmental attitude to the child so that the child feels they can talk about this should they wish to
- The child may have been told not to talk about what they are doing, or even threatened with violence. They may think they are leading an exciting, grown up, lifestyle with a ‘boyfriend’ or ‘girlfriend’ which they don’t want to end
- Closely observe the behaviour and activities of the child (looking for risk indicators). Keep the Police updated with any information that you think may be relevant, regardless of how insignificant it may seem
- Maintain a close relationship with any partner organisations involved with the child (e.g. Children’s Society, Barnardos, Health Professionals, Schools and Parents)
- Child sexual exploitation is a crime. The Police, and partner agencies will act to prevent it. If you are concerned about a child do not ignore the matter there are people who can help you
Child Sexual Exploitation
Information for people working at licensed premises

www.hertssafeguarding.org.uk
What are your responsibilities working in the licensed trade?

Under the Licensing Act 2003, premises licence holders and designated premises supervisors have a legal responsibility to make sure that children and young people are protected from harm at their premises. The guidance issued under Section 182 of the Licensing Act\(^1\) requires that children must be protected from “physical, psychological and moral harm”, so premises allowing persons under the age of 18 are expected to have systems in place to safeguard children and young people.

One of the risks at licensed premises is that of sexual exploitation. To minimize the risk to children and young people, premises need to have preventive systems in place. There may also be a financial and reputational risk, particularly if legal action is taken against a premise, which can result in the suspension or revocation of the licence. So it is important that the risk of child sexual exploitation is managed at your premise – to protect children and young people from harm – and to protect your business.

What is child sexual exploitation?

An extract from the government definition\(^2\) of child sexual exploitation says: “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.’”

How might this involve licensed premises?

Licensed premises are places where people usually go to socialise, have a drink, relax and enjoy themselves and as such they provide an ideal environment for the grooming and sexual exploitation of children and young people. As part of the grooming process adults may meet young people or take them to licensed premises, to develop a relationship of trust and make them feel special by giving them ‘treats’ such as meals or

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1. Amended Guidance issued under Section 182 of the Licensing Act 2003, April 2012: Section 2.41
alcohol, or by involving them in adult parties. A premise could be misused for this kind of activity by the people who are socialising or working there. For example:

- Adult venues (such as night clubs/sexual entertainment venues) may attract groomers if the premise is frequented by children or young people.
- Where under age drinking takes place, children and young people are at risk as their judgement is impaired.
- Premises providing goods or services that can be offered to children as gifts in exchange for sexual favours (for example, free food, drinks or cigarettes; free transport; free access to a venue in exchange for sexual favours) present risk if a groomer is employed there (or works voluntarily) and has regular or private contact with children.
- Children and young people are vulnerable in areas of premises that are not supervised or security checked (for example toilets, beer gardens, play zones).
- Risk may be present at premises where information technology equipment is used (for example, internet access, mobile phones) as social media can be used to groom vulnerable young people; cameras may be used to record or distribute indecent images of children.
- Premises providing facilities for private parties, private dancing/entertainment booths or overnight accommodation, may be vulnerable to the risk of child sexual exploitation.

Risk management and due diligence

Under the Licensing Act 2003, the ‘due diligence’ defence can be used to protect your business, if you can demonstrate that all reasonable steps have been taken to manage risk. Here are some suggested safeguarding measures to help evidence ‘due diligence’ and keep children safe:

- Undertake a written children and young people’s risk assessment and use it to inform your operating policy and staff training.
- Staff should be trained to recognise indicators of child sexual exploitation and know how to report concerns.

2 Safeguarding Children & Young People from Sexual Exploitation (Department for Children, Schools and Families 2010)
• Staff should be trained to operate an age verification scheme, know what types of identification are acceptable and to recognise signs of proxy purchase of alcohol.

• Staff training records should be maintained.

• Activity at the premises should be monitored (for example using CCTV or by regular patrols. Patrol records should be maintained.)

• Suspicious activity should be reported to the police (including details such as vehicle registration numbers, description of individuals) and should be recorded in your incident log.

• If you, or your staff, are in a situation involving the supervision of a vulnerable young person at your premise, it is important to follow a consistent and auditable protocol – for further advice about this contact the Sheffield Safeguarding Children Board.

• If you have a delivery service (for example hot food) enforce a Code of Conduct to promote good safeguarding when deliveries are made to unaccompanied children.

What to do if you have concerns about child sexual exploitation

• If you have concerns, contact the Police Child Sexual Exploitation Team ☎

• If you wish to remain anonymous, contact Crimestoppers ☎ 0800 555 111 or report online at https://secure.crimestoppers-uk.org/ams.form.anonymous.asp

Remember
“SAY SOMETHING IF YOU SEE SOMETHING”³, under the Licensing Act 2003 your premises licence may be at risk if you do not take action to protect children

³ National awareness campaign, Children’s Society 2012

When you have finished with this document please recycle it
Know the signs. Make the call.

Child sexual exploitation can happen any time of the day. Any day of the week. Keep your eyes and ears open while on duty. You can watch for situations that may suggest child sexual exploitation and help make your property unattractive to people who commit these acts.

FRONT DESK
- A man who refuses to leave a credit card imprint and insists on paying cash – there may be a reason he doesn’t want his identity known.
- Teenage girls loitering in the lobby or hallways.
- Guests who request a specific room that is isolated and private.
- Local guests who want to rent a room.
- Guests who appear secretive about their activities or who try to conceal their activities in their room.
- Frequent visitors who do not appear to have a reason for being in the hotel.
- Guests who are in and out of the property at irregular hours.

In addition to watching for these signs, management could consider implementing and enforcing policies that:
- restrict unregistered persons in guest rooms between 11 p.m. and 7 a.m.
- require visitors to use the property’s main entrance
- require staff to perform daily room checks, walk hallways and the building perimeter
- encourage staff to make eye contact with guests and inquire about their reason for being at the property
- ensure information about suspicious individuals or activities is shared with other properties in your area.

HOUSEKEEPING
- Guest rooms with a lot of condoms or condom wrappers, drugs and drug supplies, like syringes, pipes, bongs, broken light bulbs, spoons and plastic bags.
- High traffic to guest rooms.
- Guests who do not want their rooms cleaned.

BAR & ROOM SERVICE
- A hospitality suite with businessmen and young girls – the men may be here for an event, convention or meeting.
- Ask guests who appear to be under 26 for ID in licensed areas, and when delivering room service.

ALL STAFF
- Two (or more) older men and teenaged girls entering your property – they could be heading to a party room.
- Many men entering and exiting a room at regular intervals – a pimp may have arranged for men to visit a room where a child is being sexually exploited.
- A young girl or boy who appears withdrawn or who hides their face.

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- require visitors to use the property’s main entrance
- require staff to perform daily room checks, walk hallways and the building perimeter
- encourage staff to make eye contact with guests and inquire about their reason for being at the property
- ensure information about suspicious individuals or activities is shared with other properties in your area.

SHH! I won’t tell if you don’t tell.

www.hertssafeguarding.org.uk
Child sexual exploitation could be happening where you work.

Child sexual exploitation is child abuse and a crime. It can happen in communities of all sizes across Manitoba in all kinds of properties, from budget motels to luxury hotels and resorts.

That’s why the Manitoba Hotel Association and the Child Protection Branch of Manitoba Family Services and Consumer Affairs have joined forces. Our goal is to help protect children and stop the sexual exploitation of children from happening in Manitoba’s hotels and motels. We need your help because together we can protect children from a life of sexual abuse.

Child sexual exploitation is when a child under 18 is involved in a sexual act in exchange for money, food, shelter, or any other consideration. It can also involve distributing, selling or making child pornography.

Unfortunately, the exploiters aren’t always easy to spot. But there are signs you can watch for:

If you come across a situation that looks or feels suspicious, talk to your supervisor and call the child abuse intake line, your local law enforcement, or the Child and Family Services office in your area.

Child Abuse Intake 1-866-345-9241
24 hours a day, seven days a week.

Based on the information you provide, police or the intake worker on the intake line will ask you follow-up questions to determine what action to take. Your call can get a child the support and services they need to be safe from exploitation. When you call, your identity is protected by law and cannot be revealed to anyone, if you choose to remain anonymous.

Don’t assume someone else will call. And don’t worry if you’re not sure that what you’re seeing is child sexual exploitation. Your job is to make the call. The trained intake worker’s or police’s job is to decide what action to take.

Don’t let them get away with it.

If the sexual exploitation of children is taking place in your motel, hotel, inn or lodge, other illegal activities like drug dealing or meth production may also be taking place. These activities often go hand in hand—and pose a serious risk to your clientele and business.

If you are uncertain what you may be seeing, call the child abuse intake line or police. They can help you determine if what you are seeing is child exploitation. CALL NOW.

Protecting children is everyone’s responsibility. The management of this property is committed to ensuring that criminal activity doesn’t happen here. Remember, your observations and phone call can make all the difference in the world to a sexually exploited child.
THIS HOTEL HAS NO ROOM FOR HUMAN TRAFFICKING

www.hertssafeguarding.org.uk
TRAFFICKING IS:

TO BE DECEIVED OR TAKEN AGAINST YOUR WILL AND FORCED TO WORK IN PLACES LIKE THE SEX INDUSTRY, FACTORIES, SWEATSHOPS, PRIVATE HOUSES, RESTAURANTS AND ON THE STREETS.

If you see a combination of these, it may indicate someone is at risk:

- A young girl with an unrelated older man/group of men.
- Someone who is under someone else’s control.
- Someone who is physically and/or emotionally distressed (including being overly submissive/bruised/cigarette burns).
- A child travelling alone or with unrelated adults.
- An individual who does not have access to their passport.
- Someone who gives money they earn to someone else.
- Lots of people living in one property and/or a group of people picked up/dropped off at irregular hours from the same place.
- Someone who does not speak the local language or, in the case of sexual exploitation, only knows highly sexualised words.
- Someone who is excessively tired or looks drugged.
- Someone who is overly fearful of police/authorities/immigration officials.

IF YOU SEE SOMETHING SUSPICIOUS OR YOU NEED HELP -

Phone 101

Hertfordshire Constabulary

NWG Network
Tackling Child Sexual Exploitation
Say Something If You See Something

Dear Premises Manager

National Campaign: Tackling Child Sexual Exploitation

Child sexual exploitation and trafficking can involve all sorts of licensed premises, including yours. You have the power to help prevent child sexual exploitation and trafficking at your premises.

Please act now.
We are writing to you because we believe that local businesses can play a positive role in preventing child sexual exploitation, which puts children – and your business – at risk. Young people may become involved in criminality at your premises, for example, shoplifting, vandalism etc. This behaviour should not always be seen as an act of anti social behaviour but should in some cases be seen as a vulnerability factor and an indicator that they may be involved in sexual exploitation. We want to work with you to ensure that your business is not vulnerable to being associated with child sexual exploitation.

Child Sexual Exploitation involves:
Young people under the age of 18 who are encouraged/forced into a sexual relationship or situation by an adult. It often involves young people being offered something in return for performing sexual acts, for example:

Alcohol, Cigarettes, Mobile Phones, Gifts, Money, Drugs, Love

Where does it happen?
Young people can be groomed and sexually exploited at a variety of premises and locations such as:

- Parks
- Shopping centres
- Taxi ranks
- Restaurants
- Takeaways
- Gyms
- Leisure centres
- Hotels
- Hostels
- Pubs/bars/clubs
It is the responsibility of premises license holders and their managers to make sure that suitable control measures are in place at licensed venues for the protection of children from harm. This is a legal requirement under the Licensing Act 2003

Act now!
Failure to comply with your legal obligations can lead to consequences such as:
- Financial and/or reputational damage
- Revocation of licence
- Prosecution

Due to increased national media attention and rising concerns about this issue, there will be more enforcement agencies monitoring more closely the way in which you operate your business. We want to assist you so that you are complying with duties set out in Law. When issues arise at licensed premises in relation to child sexual exploitation, it is vital that action is taken to reduce harm to children. We ask that you contact us immediately and let us know if there are any problems at your premises so that we can assist. We can help you reduce the impact that this issue can have on your business, particularly as incidents can often attract unhelpful media attention to your business and damage your reputation. Licensing staff have vital role in identifying signs that sexual exploitation may be taking place. We can provide assistance tin training to you and your staff to recognise these signs and this protection will cost you nothing. We aim to prevent businesses in the UK being targeted by criminals by promoting and delivering a campaign called Say Something If You See Something.

This campaign is aimed at local businesses. It is supported by a resource pack which includes posters advising people that sexual exploitation is a crime, leaflets for staff on what to look out for and most importantly which agencies to contact if you believe your premises is being used this way.

You and your staff may also access a free a training course, which will raise your awareness of child sexual exploitation. We would encourage you and your staff to attend one of these sessions and disseminate the learning amongst your teams. By attending you may prevent a vulnerable child from being exploited and maintain the credibility of your business. The training will be targeted at Managers and key front line staff such as receptionists, porters, housekeeping and cleaners.

Please respond to this letter by contacting ... so that we can begin assisting you in tackling this issue

Yours sincerely,
XXXXXX

(Add local details)
BRIEFING PAPER FOR SUBMISSION TO: [INSERT NAME], CHAIR, [INSERT ORGANISATION EG CHAMBER OF
COMMERCE; HOSPITALITY TRADE FORUM MEETING ETC]

CHILD SEXUAL EXPLOITATION AND THE HOSPITALITY TRADE
The city of XXXX enjoys the reputable status of being a safe and vibrant city that is culturally diverse. Many of our leisure and entertainment facilities and events have become ‘destination venues’ attracting visitors locally and nationally and our hospitality trade contributes significantly to the city’s appeal and to its local economy.

Over the past year, child sexual exploitation and human trafficking has become an increasing Government priority; guidance1 has been issued and research undertaken to identify how and where this activity takes place. In the Office of the Children’s Commissioner’s report published November 2012, a number of locations were identified as being associated with child sexual exploitation and this included premises associated with the hospitality trade. In January 2012 a Coventry hotel was reported in the media to have been misused by an organised group of men who hired out rooms for sex parties with teenage girls, some as young as 14. The girls were given alcohol and drugs and were victims of child sexual exploitation at the premises.

In [INSERT TOWN/CITY] the statutory agencies are taking a proactive, partnership approach towards prevention child sexual exploitation in our hotels. We want to support our colleagues in the hospitality trade to protect children and young people – and their own business – from the risk of this crime so that they can continue to provide safe and reputable venues. In order to support hoteliers, the Safeguarding Children Board, [INSERT REGION] Police and [INSERT CITY] Council have developed a resource pack for the hospitality trade; this is part of a national initiative2 and has the endorsement of The Children’s Society/National Working Group for the Prevention of Child Sexual Exploitation. The resource pack contains posters, leaflets, due diligence recording system templates, model protocols, checklists and a staff training pack.

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1 National Action Plan, Tackling CSE published by the Dept for Education November 2011; Working Together to Safeguard Children and Young People from Sexual Exploitation published 2009 as supplementary guidance to Working Together guidance

2 Children’s Society/National Working Group for the Prevention of Child Sexual Exploitation ‘Say Something If You See Something’ awareness campaign
The materials we offer are in line with the Association of Corporate Travel Executives’ (ACTE) Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism which was launched in April 2013 in a bid to raise the awareness of the travel industry and encourage it to comply with good safeguarding practice by complying with the code. Further information about the code is available at (www.code.org), however to summarise its principles the code requires those signed up to take specific steps including to:

- Establish policies and procedures to prevent sexual exploitation of children.
- Train employees/members in the prevention of sexual exploitation and how to report suspected cases.
- Enforce a zero tolerance policy of sexual exploitation of children.
- Support, collaborate and engage stakeholders in the prevention of sexual exploitation of children.
- Report annually on implementation of Code-related activities.

The multi-agency pack that has been developed in [INSERT TOWN/CITY] contains suitable resources that are designed to assist hoteliers in meeting the Code criteria. In addition to this, the proposed safeguarding systems and related recording systems can help hoteliers produce evidence of ‘due diligence’ should an incident occur.

The pack will be available free of charge.

There are a number of criminal offences associated with child sexual exploitation and human trafficking resulting in damaging consequences including a possibility of prosecution, action being taken against a premises licence and reputational/financial damage. By working together we can play a positive role in protecting children and local business from this activity.

We feel that it is vital that our local hospitality trade partners engage with this campaign and therefore we are seeking the support and endorsement of Hospitality [INSERT TOWN/CITY] in rolling out this campaign.

NAME OF LOCAL CAMPAIGN LEADER/S
STRATEGY FOR A LOCAL CAMPAIGN

- The lead agency is often the police or Lscb but this may vary across local authorities. The lead agency should be assisted by partner/stakeholder agencies.

- Statutory agencies including police, safeguarding, council, (safer neighbourhood officers, enforcement teams, licensing authority, relevant voluntary agencies). The role of this group is to look at local issues, share information (for example from police or safeguarding strategy meetings); Identify what existing resources and processes are in place and what relationships/structures are in place between partner agencies and the hospitality trade.
- Agree reporting mechanisms and lines of accountability.

- The role of this group is to develop and deliver the local awareness campaign

- For example, you could approach the Chamber of Commerce, or the Chair of your local hospitality trade group; or do hotel visits to meet the hotel managers to explain the campaign face to face.

- Agree the style and format of the training your campaign will deliver to hotels. For example you may use /adapt the pack available from the National Working Group for the Prevention of Child Sexual Exploitation. This includes posters, due diligence records and training resources.
- Agree key local messages and local information for the hotel trade.

- The trigger plan initiates a proportionate intervention in response to CSE signs or concerns. The plan should be designed to mitigate any unnecessary impact on the operation or reputation of the hotel. An example of a police trigger plan can be found at Appendix 1. (The trigger plan is underpinned by staff in relevant departments/locations being trained to implement it.)

- Identify and organise how staff working in the hospitality trade will be trained (for example, via existing forums such as trade meetings, or by hosting a training event, or by training 'CSE Champions' (training the trainers to cascade the training in-house), or by delivering to individual hotels.)
- Decide how to launch your local campaign.

- This may include:
- number of hotel staff attending training; number of calls/referrals/incidents received; number of prosecutions; number of agency interventions (for example advice visits, action plans in response to CSE issues at hotels); Number of actions taken under licensing legislation

- Train partner agencies who have an enforcement role (for example, police, fire & rescue, environmental/health protection services, council licensing enforcement teams) to routinely check on premises when they visit. Training should include 'what the local campaign is trying to achieve', 'who to report concerns to' what the signs of CSE are'. Enforcement partners should be assisted by providing them with a safeguarding check to be used alongside their own routine checks. The checklist should include: are staff training records being maintained and up to date? Are posters displayed in staff rooms; Are refusals and incidents logs maintained? Is CCTV operating /are patrol records maintained.

- If hotels are identified as failing to comply with the principles of the campaign, or if there is an evident lack of due diligence regarding safeguarding, proportionate enforcement action should be taken. For example, an advice visit should be undertaken to remind hotels of their responsibilities; or, an action plan may be set with specific tasks and timescales for completion; or action may be taken under the Licensing Act 2003 if the location is licensed.
Hotel

TRIGGER PLAN

Operation Makesafe has been implemented to tackle perpetrators of Child Sexual Exploitation (CSE) utilising Hotel Rooms to carry out their activity. This document explains what actions South Yorkshire Police are required to take if an incident is reported by Hotel staff.

Op Makesafe is a Force Wide Operation in relation to Child Sexual Exploitation. The victims are vulnerable young persons who, at first, do not realise what is happening to them as they are subjected to a process of ‘Grooming’. This is where the offender gains the trust and confidence of their young underage victim, often by giving them gifts in return for sexual acts. The gifts include Alcohol, Phones, Money, Affection and Drugs etc. The victim often perceives themselves as being in a loving relationship. The process swiftly moves on, victims are passed to other males who force them into sexual acts. Victims have been known to be as young as 11 years old, powerless against their perpetrators who control them with violence or fear of violence against them, their families or friends.

This operation will run in conjunction other initiatives SYP are running to tackle CSE. It is partnership working between South Yorkshire Police, Hotels and Safe Guarding Children

What are the warning signals?

These are the things that staff at Hotels have been instructed to look out for. If they have any suspicions then they will ring either 101 or 999 depending on the situation. It might be that they report directly to a Police Officer or Police Community Support Officer (PCSO) who is covering that area. Some of the warning signals may be observed by an officer directly.

- Young people checking in with older adults and something doesn’t seem quite right.
- Guests paying in cash
- Multiple adults and young people checking into the rooms
- A person who looks fearful, nervous, withdrawn uncomfortable
- Young people loitering in the reception or corridors
- Frequent visitors who do not appear to have a reason for being in the hotel
- Guests who are in and out of the hotel at irregular hours
- Noise complaints
- Last minute/walk in bookings
- Signs of alcohol, drug or substance misuse
- A person who appears incoherent or uncomfortable and who may act under instruction
- Bookings made in different names to those who check in
- A person who may not speak the same language as the person checking in
- Guests who request a specific room that is isolated and private
- Signs of sexual activity – lots of condoms wrappers
- Multiple visitors to a room
- Room Service – alcohol orders for guests who appear to be underage
- Guests who do not request their rooms to be cleaned
- Guest who do not having luggage
Our Response

Call Handlers/Dispatchers

Call received at Atlas Court from the Hotel regarding any of the above warning signals. Hotel staff have been instructed to use the name ‘Operation Makesafe’, obviously they may not remember and this is where call handlers will make the connection with the operation from the information the caller is passing to them. This must not delay the required response. The operator will carry out the following

1. Establish the location, time and exact details of the incident. This is crucial for the resources that are deployed and will trigger the graded response. Consider possible victim(s) their age and vulnerability

2. Graded immediate – Refer to FIM/Dispatch Supervisor, Dispatch to inform district SGT/INS, appropriate resources to be deployed

3. Not graded immediate - Grade as appropriate, Refer to FIM/Dispatch Supervisor, Dispatch to contact district SGT/INS to manage the incident,

4. Call Advisor to ask the following

- Thorough description of offender(s) and or victim(s)
- Are the persons still present and where exactly they are in the hotel, if they have left - direction of travel method of transport if any. What time did they leave?
- Has a vehicle been used, have details of a vehicle been given when reserving a room
- Where else have they been within the premises and advise to not move or touch any items if possible
- Is CCTV evidence available
- Point of contact/contact number/nominated person to meet officers at agreed location at the premises
- Advise that a an officer will be with them or will make contact with them within the next (Appropriate time frame)

Force Incident Manager (FIM)/Dispatch Supervisor

1. Monitor the Incident; consider possible victim(s) their age and vulnerability.

2. Monitor allocation of appropriate resources by dispatch

Operational Deployment

District Sgt/Insp

1. Resources to be dynamically assessed, consider possible victim(s) their age and vulnerability

2. If persons have left in a vehicle, identify and coordinate the resourcing of suitable static points on arterial routes.

3. Observations and circulations to surrounding Districts/Forces
officers attending the scene and initial investigation

1. Liaise with nominated member of staff at the Hotel and confirm what they are reporting

2. If persons are in a Hotel Room, then dynamic risk assessment as to method of entry, it may be that it is appropriate for a staff member to knock and ask for the occupant to answer the door, consider possible victim(s) their age and vulnerability

3. Consider powers of entry – Hotel staff have authority to enter a room if they suspect illegal activity is taking place. They cannot give a Police Officer permission to enter and search so then consider Police Powers
   - Section 17 of the Police and Criminal Evidence Act 1984 creates a power to enter premises (within certain constraints) to effect an arrest, or to save life or limb, or to recapture a person.
   - Breach of the Peace under Common Law

For full wording and guidance on the above powers of entry see PNLD D215, D447

4. Establish what offences have or may have taken place,
   - If there is a victim, arrange immediate welfare, consider forensic evidence, avoid cross contamination, do not let the victim wash or change clothing. Take them to an appropriate location it may be that they need to go to hospital or it may be satisfactory to get them to back to the police station and contact Public Protection Unit (PPU), consider contacting Social Services - telephone numbers below
   - Inform Duty Inspector if a young person is found. The Inspector may deem it appropriate to take out a Police Protection Order - Gen 118
   - Persons arrested, ensure CID or if it is during the night the Night Detective Officer is informed
   - Request SOCO
   - Check for CCTV.
   - If the room cannot be forensically examined at the time, ensure it is secure, if necessary, an officer to stay at the scene. Instruct Hotel Staff not to enter the room or carry out any cleaning etc.
   - Where appropriate submit
     a) National Intelligence Report (NIR)
     b) Gen 117 (Referral to Public Protection Unit (PPU) mark it for the attention of the PPU Sergeant
   - Submit all paperwork before going off duty.
For any further Guidance please contact PS 3218 Katherine Wallis
Katherine.wallis@southyorks.police.pnn.uk
Blackberry 07799072331
SAY SOMETHING IF YOU SEE SOMETHING

Indicators for businesses

- Young people who are:
- Displaying volatile behaviour
- Involved in criminal behaviour, shoplifting, vandalism, aggressive behaviour etc.
- In possession of multiple mobile phones/sim cards
- Associating with groups/gangs
- At premises during school time/term
- Inappropriately dressed (sexualised or not age appropriate)
- Associating with significantly older peers
- Experimenting with drugs/alcohol
- Appearing to be heavily intoxicated
- Appearing to be controlled by an older person
- Older person speaking on behalf of young person
- Regular sittings of same adults associating with different young people
- Congregating in known ‘hot spot’ areas
- Appearing to have inappropriate relationships with staff at premises
- Entering unregistered taxis
- Access to large amounts of cash
- Offering sexual activity within the vicinity of the premises
- In the company of known adult sex workers
- Suspected to be working at a premises unlawfully
- Young person discloses that they are in a relationship with significantly older person or discloses that they are going to parties with older associates
INDICATORS FOR HOTEL STAFF

Checking In - hotel reception

- Young male or female checking in with an older male – significant age difference
- Adult checking in is a frequent user of the hotel and has been seen with different people
- Insists on paying in cash
- Booking in a different name to the person checking in. Female names are commonly used
- Guests who request a specific room that is isolated and private
- Multiple adults and young people checking into the room
- A person appears incoherent or uncomfortable, may act under instruction
- A person who looks fearful, nervous or withdrawn,
- A person may not speak the same language as the person checking in
- A young person who does not behave in a way that is seen to be typical of someone their age
- Wears inappropriate clothing for their age or looks particularly uncomfortable in their clothing
- Last minute/walk in bookings, often late at night
- Teenage girls loitering in the reception or corridors
- Frequent visitors who do not appear to have a reason for being in the hotel
- Guests who are in and out of the hotel at irregular hours
- Complaints of noise from the room occupied by those causing concern
- Check out early

Housekeeping – hotel rooms

- Signs of alcohol, drug or substance misuse – lots of condom wrappers, drug and drug supplies like syringes, pipes, spoons/cookers, antiseptic wipes, prescription or over the counter drugs.
- Guests who appear secretive about their activities or who try to conceal their activities in their room
- Multiple visitors to a room
- Signs of sexual activity in the room
- Guests who do not want their rooms cleaned.
- Room service – alcohol orders to rooms where you perceive guests to be under age.

Sexual Exploitation can happen any time of the day and any day of the week. Please keep your eyes and ears open while on duty. By being alert you may prevent a vulnerable child or woman from being exploited and maintain the credibility of your hotel.
PREVENTING CHILD SEXUAL EXPLOITATION AT LICENSED PREMISES
HOSPITALITY TRADE CHECKLIST

What to train your staff to look out for in the hotel trade1

- Adult refusing to leave credit card imprint and paying in cash
- Teenagers loitering in public areas/external areas of premises
- Guests requesting a room that is isolated
- Guests with local address renting a room
- Guests who appear secretive about their visit or trying to conceal their activities in the room or who they are with
- Frequent visitors to the hotel who do not appear to have a reason for being there
- Guests who move in and out of the premises regularly at unusual hours
- Guest rooms with a lot of condoms/condom wrappers, drugs/drug paraphernalia (eg syringes, wraps, pipes, bongs, broken light bulbs, spoons, plastic bags)
- High traffic to guest room
- Guests arriving and asking for a specific room number but they don’t know the name in which the room is booked
- Guests who don’t want their room cleaned or visited
- Guests who do not have any luggage or ID
- Young people with significantly older boyfriends/girlfriends
- A hospitality suite with business men/women and young girls/boys (adults may be there for an event, conference or meeting)
- Guests who appear to be under the age of 25 for ID both in the licensed area and when delivering alcohol to rooms
- Two or more adults heading for room may indicate room is being used for a party

1 National Working Group for the Prevention of Child Sexual Exploitation SAY something if you SEE something campaign is being used for a party
- Number of adults visiting a room at regular intervals
- A young girl/boy who appears withdrawn or tries to hide their face or appear afraid, disorientated or restricted from moving or communicating
- Young girls who appear overly made up
- Guests who access an excessive or unusual amount of pornography (TV or computer)
- Individuals who appear to be monitoring public areas

Risk Management Systems
- Challenge 25 scheme including staff training, only accept photo ID (passport, driving licence or PASS logo)
- Encourage staff to make eye contact and engage in conversation to inquire about the reason for guests’ visit or stay
- Patrols (eg daily room checks walk hallways and the building perimeter)/CCTV monitoring
- Children and Young People’s risk assessment (should be undertaken in writing and the outcome should inform staff training, briefings and operating policy)
- Staff training and training records
- Restrict unregistered persons in guest rooms between 11pm and 7am
- Require visitors to use the main entrance to the premises
- Report suspicious activity to local police and record information in an incident log including credit card details, physical description, retain CCTV recordings, vehicle registration numbers, times of arrival/departure and findings/nature of concern
- Agree a protocol for responding to CSE with your local police team
- Establish a whistle blowing policy with staff
- Assign a responsible member of staff to act as a single point of contact / Safeguarding Co ordinator at the premises

www.hertssafeguarding.org.uk
Training Material

SAY SOMETHING IF YOU SEE SOMETHING

Sexual exploitation is abuse and a crime.

If you think it is happening here talk to your supervisor or call Crimestoppers: 0800 555 111

WATCH FOR:
- A lot of music visitors in one room. A party room with lots of men, girls, drugs and alcohol. A lot of random wrappers in the bin. Meet paying with cash.

QUIET PLEASE.
Let’s just keep this between you and me.
Programme

- Child Sexual Exploitation
- The Law
- What to look for
- Trafficking
- What to do
- Managing risk
- Useful resources
- Training your staff
What is Child Sexual Exploitation?

- Young people under 18 who are encouraged, trapped, forced or coerced into a sexual relationship or situation by an adult.

- It involves young people being offered something in return for performing sexual acts.

- Alcohol, Cigarettes, Mobile Phones, Gifts, Money, Drugs, Love
The Law

- Serious Sexual Offences
- Rape
- Assault
- Child Abduction
- Consent
- Licensing
- Health and Safety
What to look for

- Activity – Is it or isn’t it?

- Case studies/scenarios
What to look for (Hotels)

- Young male or female checking in with a significantly older male(s)
- Guest insist on paying in cash
- Multiple Adults and young people checking into the rooms
- A person who looks fearful, nervous, withdrawn uncomfortable
- Teenage girls loitering in the reception or corridors
- Frequent visitors who do not appear to have a reason for being in the hotel
- Guests who are in and out of the hotel at irregular hours
- Noise complaints
- Last minute/walk in bookings
(See lists of indicators)
Staff training checklist for the hotel trade

- Adult refusing to leave credit card imprint and paying in cash
- Teenage girls loitering in public areas/external areas of premises
- Guests requesting a room that is isolated
- Guests with local address renting a room
- Guests who appear secretive about their visit or trying to conceal their activities in the room or who they are with
- Frequent visitors to the hotel who do not appear to have a reason for being there
- Guests who move in and out of the premises regularly at unusual hours
- Guest rooms with a lot of condoms/condom wrappers, drugs/drug paraphernalia (eg syringes, wraps, pipes, bongs, broken light bulbs, spoons, plastic bags)
- High traffic to guest room
- Guests arriving and asking for a specific room number but they don’t know the name in which the room is booked
- Guests who don’t want their room cleaned or visited
- Guests who do not have any luggage or ID
- Young people with significantly older boyfriends
- A hospitality suite with business men and young girls/boys (adults may be there for an event, conference or meeting)
- Guests who appear to be under the age of 25 for ID both in the licensed area and when delivering alcohol to rooms
- Two or more adult males heading for room may indicate room is being used for a party
- Number of men visiting a room at regular intervals – a pimp may have arranged for men to visit the room where a child is being sexually exploited
- A young girl/boy who appears withdrawn or tries to hide their face or appear afraid, disorientated or restricted from moving or communicating
- Young girls who appear overly made up
- Guests who access an excessive or unusual amount of pornography (TV or computer)
- Individuals who appear to be monitoring public areas

(See lists of indicators)
 Trafficking

Children and young people who are victims of sexual exploitation are vulnerable to trafficking across cities and counties within the UK and also international trafficking into and out of the UK for the purposes of sexual exploitation. Trafficking involves the illegal trade in human beings for the purposes of sexual exploitation.
Trafficking within the UK

The recognition of trafficking within the UK applies irrespective of distance travelled, and hence can be applied to movements within the same city.
Trafficking

Section 59A of the Sexual Offences Act 2003 (SOA) specifies that trafficking within the UK for the purposes of sexual exploitation is an offence punishable by up to 14 years in prison.
What to do

- Speak to your Supervisor or Manager
- Call the police – 101 or in an emergency 999
- Download and secure any CCTV
- Record any relevant registration number plates
- Detailed descriptions of any potential offenders / vehicles
- Identify methods of payments i.e. cash/credit/debit cards
- Secure any information regarding key card usage for the rooms
- Secure any information regarding items left behind
- Call Crimestoppers on 0800 555 111
What to do

- If you think a criminal offence has taken place/or maybe taking place
- Call the police
- Seal off the hotel room, do not allow anyone to enter until police arrive
- Have a member of staff meet officers on their arrival
- Record all relevant information
What can you do

- Nominate a Safeguarding Representative for your premises
- Sign up to the code/principles
- Provide awareness training to your staff
- Use the campaign material within your premises
- Lobby for an “ugly mugs” scheme to be developed
Managing the risk of child sexual exploitation at licensed locations

The risks will vary depending on the style and character of the business but premises can be involved in the following ways:

- If an adult venue (night clubs/sex entertainment venue) is frequented by underage customers this can attract perpetrators; or if a premises (or event) hosts under 18 events or mixed age activities
- Where underage drinking takes place, children and young people are vulnerable as their judgement is impaired
- There is a risk of CSE at premises where goods or services can be offered in exchange for sexual favours (such as free food, transport, drinks, cigarettes, or free access to a venue). This can happen if a perpetrator is employed there (or works voluntarily) and has regular or private contact with children.
- Children and young people are vulnerable in areas of premises that are not monitored (such as toilets, beer gardens)
- Risk may present if information technology is in use at a premises (internet, mobile phones/cameras/video recorders)
- Premises providing facilities for private parties, private dancing/entertainment booths or overnight accommodation may be vulnerable to child sexual exploitation
Risk Management Systems

It’s important to take all reasonable steps to protect children and your business from CSE so you need to have robust safeguarding systems in place. For example:~

- Operate the Challenge 25 scheme at the point of serving or delivery, only accept photo ID (passport, driving licence or PASS logo) include this in your staff training to focus attention on younger looking customers and the activities they are involved in.
- Encourage staff to make eye contact and if appropriate, to engage in conversation to inquire about the reason for the customer’s visit or stay
- Assign a responsible member of staff to act as a single point of contact/Safeguarding Co ordinator
- Monitor customer activity using foot patrols (eg floor walking in pubs/clubs; glass collecting or table waiting in restaurants can be used to ‘patrol’; do regular room checks; walk hallways and the building perimeter); Make use of regular CCTV monitoring
- Undertake a Children and Young People’s risk assessment (do this in writing ~ the outcome should inform staff training, briefings and the premises operating policy)
- Restrict unregistered persons in guest rooms or private areas between 11pm and 7am
- Require customers to use the main entrance to the premises
- Report suspicious activity to local police and record information in an incident log including credit card details, physical description, retain CCTV recordings, vehicle registration numbers, times of arrival/departure and findings/nature of concern
- If you can, agree a police reporting protocol between your premises and the local police. This may involve police call handlers being trained to respond to your calls so that they can assist in a proactive and discrete way.
Training Your Staff

In addition to the above, make sure ALL STAFF receive training so that they know what the signs of CSE might be at your premises and understand what procedure to follow if a safeguarding issue arises. Keep staff training records signed and dated and include a description of the content of the training along with the details of the trainer and trainee. You may wish to give staff a ‘safeguarding checklist’ as part of their induction training as an aide memoire of what might constitute a sign of CSE and how to report concerns.

- Checklist of what staff need to know
- Up-to-date records for individual employees
- Regular refresher sessions
- Incentivised schemes for employee training
- Whistle blowing policy
- Training should include: Age verification; CSE awareness; Premises monitoring, clear protocols.
Useful Resources

NWG Network www.nwgnetwork.org
Crimestoppers www.crimestoppers-uk.org
Missing People www.missingpeople.org.uk
Childline www.childline.org.uk
The Children’s Society www.thechildrenssociety.org
The Child Exploitation and Online Protection (CEOP) Centre www.ceop.gov.uk
The NSPCC National Child Trafficking Advice and Information Line (CTAIL) www.nspcc.org
Parents against child exploitation (PACE) www.paceuk.info
ECPAT UK www.ecpat.org.uk
International Centre for the Study of Sexually Exploited and Trafficked Young People
www.beds.ac.uk/research/iasr/intcent
NSPCC Inform www.nspcc.org.uk/Inform
ThinkUKnow www.thinkuknow.co.uk
The Sex Education Forum ncb.org.uk/sef
UK Human Trafficking Centre www.ukhtc.org
LEARNING FROM CASE STUDIES AT LICENSED LOCATIONS

Scenario 1: Hot Food Takeaway

A hot food takeaway with a home delivery service is located in a deprived area of the city.

The business managers speak little English and appear unfamiliar with compliance and regulations in relation to their business and they have no training or awareness of safeguarding.

The business is run by an adult male and his partner and holds no employment records or information about its delivery staff; all they have is a list of 22 mobile phone numbers which they dial (randomly) to request a driver. The driver is paid £2 cash in hand per delivery.

There are no staff training records or induction systems to ensure drivers behave appropriately and safely with young customers.

What are the risks to children and young people?
- Delivery driver may use the private contact with child/young person to develop a relationship/groom for CSE
- Driver may exchange free food or other gifts for sexual favours

What are the risks to the business?
- Reputational
- Financial
- Legal action - breach of regulations pose risk to business

What safeguarding measures should be operating at this type of premises?
- Maintain employment records: national insurance number; identity verification checks; name, date of birth, address; vehicle registration number.
- Enforce a Code of Good Safeguarding Conduct including disciplinary measures if staff fail to comply/behave inappropriately
- Train all staff to work to the Code of Conduct and maintain staff training records
- Maintain incident logs in relation to safeguarding issues
Scenario 2: Adult Night Club

A city centre night club has recently been taken over by new management and has changed its music policy. The club is popular with young people as it hosts ‘pop and crisp’ under 18’s nights but the adult sessions are also reputed to allow underage customers due to a ‘relaxed’ door policy. The music policy and guest DJs are attracting individuals known to be operating as organised crime gang members. There is evidence of Class A drug use and dealing at the location and there has recently been a violent incident resulting in a 17 year old being stabbed.

A youth worker has heard that two female students from a local secondary school, one aged 13, the other 14, are going to the club on Saturday nights (adults only) using a VIP pass which they get from the bouncers. Next Saturday they are going to an after-party with one of the DJs.

What are the risks to children and young people?

- Adults using position of employment (DJ/Bouncer) to develop a relationship/groom for CSE/CSE parties/abduct
- Staff may exchange free access to the club for sexual favours
- Physical harm (violence; drugs)

What are the risks to the business?

- Reputational
- Financial
- Legal action - breach of regulations pose risk to business

What safeguarding measures should be operating at this type of premises?

- Strict age verification policy (Challenge 25)
- Staff training for vigilance and reporting in relation to CSE signs
- Staff training to enforce safeguarding systems
- Over 18’s membership scheme requiring 2 recognised forms of ID, one being photo ID and no ‘on the spot’ membership
- Patrols/CCTV monitoring
- Protocol for responding to vulnerable young people presenting at the club to ensure appropriate supervision arrangements are in place while the young person is under temporary supervision of adult staff at the premises and to ensure suitable duty of care protocols are followed
- Clear protocol for reporting concerns to police/preserving evidence
- No VIP/Guest passed
- All persons entering or re-entering the club must be subject to age checks and security checks
Scenario 3: Shopping Precinct

A new shopping mall has become a meeting point for young people who hang out and socialise there. It stays open until 10pm on Friday and Saturday evenings and unaccompanied children aged 11 upwards visit the cinema, restaurants and shops there. There are people from all regions visiting daily some local regulars but in general a transient population.

What are the risks to children and young people?

- Perpetrators loitering around ‘hot spot’ areas to target/groom children for CSE
- Places misused for grooming or abuse (treats, restaurants, alcohol, gifts; outside/unmonitored areas)
- Recording of images/indecent images on mobile phone/cameras/video recorders
- Staff may network with perpetrators to identify, locate and target vulnerable young people
- Abduction

What are the risks to the business?

- Reputational
- Financial
- Legal action - breach of regulations pose risk to business

What safeguarding measures should be operating at this type of premises?

- Staff training for vigilance and reporting in relation to CSE signs
- Staff training to enforce safeguarding systems and awareness of hot spot areas
- Patrols/CCTV monitoring
- Protocol for responding to vulnerable young people presenting at the mall to ensure appropriate supervision arrangements are in place while the young person is under temporary supervision of adult staff at the premises and to ensure suitable duty of care protocols are followed
- Clear protocol for reporting concerns to police/preserving evidence
- Vehicle number plate recognition system
- Age verification policy (Challenge 25) where alcohol is on sale

www.hertssafeguarding.org.uk
CSE hotel training case study

Aims and objectives

To help course participants to recognise the signs of CSE on their premises

Duration

20 mins

Materials

Sets of green and red cards with YES and NO written on them

Copies of the case study

Activity

1. For small groups of less than 8 participants: Read out the case study pausing after each section to ask participants to hold up a YES or NO card if they think CSE is going on. Ask why they came to that decision.

For larger groups: - divide the groups into small groups of 4. Hand out section 1 of the case study. Allow 2-3 mins for the group to decide whether CSE is happening. Ask the group to explain their reasons for their decision

2. Repeat the process with section 2- 4.

3. At the end of the case study, highlight the indicators that CSE is going on
Is It or Isn’t It?

1. You have received a last minute booking for one night. The man booking the room says that they are guests at a wedding and need the room to change and stay the night. He is keen to pay by cash.

Mid-evening, 3 men of various ages, between 20 and 50, and 2 teenage girls, arrive at the hotel to take up the booking. They have a number of packages with them wrapped in wedding gift paper. As the evening progresses, other friends of the guests seem to come and go. There is a lot of noise – music, laughing coming from the room and people seem to be drunk. There is a ‘do not disturb’ notice on the door.

Is it or isn’t it?

2. The hotel guests don’t leave the room together, but as the evening progresses, different people come and go. The noise from the room is continuing into the early hours. At 3am, the 2 teenage girls leave. They look drunk and one is crying. The other girl says her friend is ‘tired and emotional’ and giggles.

Is it or isn’t it?

3. The next day the hotel domestic staff comment on the amount of empty vodka bottles and cannabis roaches. There are also teaspoons lying around and pieces of tinfoil in the bins with the wedding gift wrapping paper. A number of used condoms are found in the bathroom.

Is it or isn’t it?

4. The following weekend you receive another booking for one night under similar circumstances. The man seems familiar.

Is it or isn’t it?
Is It or Isn’t It?

You have received a last minute booking for one night. The man booking the room says that they are guests at a wedding and need the room to change and stay the night. He is keen to pay by cash.

Mid-evening, 3 men of various ages, between 20 and 50, and 2 teenage girls, arrive at the hotel to take up the booking. They have a number of packages with them wrapped in wedding gift paper. As the evening progresses, other friends of the guests seem to come and go. There is a lot of noise – music, laughing coming from the room and people seem to be drunk. There is a ‘do not disturb’ notice on the door.

Is it or isn’t it?

The guest insists on paying in cash  
Last minute booking  
Frequent visitors who are in and out at irregular hours  
Young person checking in with an older male

The hotel guests don’t leave the room together, but as the evening progresses, different people come and go. The noise from the room is continuing into the early hours. At 3am, the 2 teenage girls leave. They look drunk and one is crying. The other girl says her friend is ‘tired and emotional’ and giggles.

Is it or isn’t it?

Complaints of noise from the room  
People coming and going  
A young person who appears incoherent and uncomfortable

The next day the hotel domestic staff comment on the amount of empty vodka bottles and cannabis roaches. There are also teaspoons lying around and pieces of tinfoil in the bins with the wedding gift wrapping paper. A number of used condoms are found in the bathroom.

Is it or isn’t it?

Alcohol and drug paraphernalia in the room  
Signs of sexual activity in the room

The following weekend you receive another booking for one night under similar circumstances. The man seems familiar.

Is it or isn’t it?

An adult checking who is a frequent user of the hotel with different people
Managing the risk of child sexual exploitation at licensed locations

The risks will vary depending on the style and character of the business but premises can be involved in the following ways:

- If an adult venue (night clubs/sex entertainment venue) is frequented by underage customers this can attract perpetrators; or if a premises (or event) hosts under 18 events or mixed age activities
- Where underage drinking takes place, children and young people are vulnerable as their judgement is impaired
- There is a risk of CSE at premises where goods or services can be offered in exchange for sexual favours (such as free food, transport, drinks, cigarettes, or free access to a venue). This can happen if a perpetrator is employed there (or works voluntarily) and has regular or private contact with children.
- Children and young people are vulnerable in areas of premises that are not monitored (such as toilets, beer gardens)
- Risk may present if information technology is in use at a premises (internet, mobile phones/cameras/video recorders)
- Premises providing facilities for private parties, private dancing/entertainment booths or overnight accommodation may be vulnerable to child sexual exploitation
Risk Management Systems

It's important to take all reasonable steps to protect children and your business from CSE so you need to have robust safeguarding systems in place. For example:

- Operate the Challenge 25 scheme at the point of serving or delivery, only accept photo ID (passport, driving licence or PASS logo) include this in your staff training to focus attention on younger looking customers and the activities they are involved in.
- Encourage staff to make eye contact and if appropriate, to engage in conversation to inquire about the reason for the customer's visit or stay
- Assign a responsible member of staff to act as a single point of contact/Safeguarding Co ordinator
- Monitor customer activity using foot patrols (eg floor walking in pubs/clubs; glass collecting or table waiting in restaurants can be used to 'patrol'; do regular room checks; walk hallways and the building perimeter); Make use of regular CCTV monitoring
- Undertake a Children and Young People’s risk assessment (do this in writing ~ the outcome should inform staff training, briefings and the premises operating policy)
- Restrict unregistered persons in guest rooms or private areas between 11pm and 7am
- Require customers to use the main entrance to the premises
- Report suspicious activity to local police and record information in an incident log including credit card details, physical description, retain CCTV recordings, vehicle registration numbers, times of arrival/departure and findings/nature of concern
- If you can, agree a police reporting protocol between your premises and the local police. This may involve police call handlers being trained to respond to your calls so that they can assist in a proactive and discrete way.
Training Your Staff

In addition to the above, make sure ALL STAFF receive training so that they know what the signs of CSE might be at your premises and understand what procedure to follow if a safeguarding issue arises. Keep staff training records signed and dated and include a description of the content of the training along with the details of the trainer and trainee.

You may wish to give staff a ‘safeguarding checklist’ as part of their induction training as an aide memoire of what might constitute a sign of CSE and how to report concerns.

- Checklist of what staff need to know
- Up-to-date records for individual employees
- Regular refresher sessions
- Incentivised schemes for employee training
- Whistle blowing policy
- Training should include: Age verification; CSE awareness; Premises monitoring, clear protocols.

www.hertssafeguarding.org.uk
Staff training checklist for the hotel trade

■ Adult refusing to leave credit card imprint and paying in cash
■ Teenage girls loitering in public areas/external areas of premises
■ Guests requesting a room that is isolated
■ Guests with local address renting a room
■ Guests who appear secretive about their visit or trying to conceal their activities in the room or who they are with
■ Frequent visitors to the hotel who do not appear to have a reason for being there
■ Guests who move in and out of the premises regularly at unusual hours
■ Guest rooms with a lot of condoms/condom wrappers, drugs/drug paraphernalia (e.g., syringes, wraps, pipes, bongs, broken light bulbs, spoons, plastic bags)
■ High traffic to guest room
■ Guests arriving and asking for a specific room number but they don’t know the name in which the room is booked
■ Guests who don’t want their room cleaned or visited
■ Guests who do not have any luggage or ID
■ Young people with significantly older boyfriends
■ A hospitality suite with business men and young girls/boys (adults may be there for an event, conference or meeting)
■ Guests who appear to be under the age of 25 for ID both in the licensed area and when delivering alcohol to rooms
■ Two or more adult males heading for room may indicate room is being used for a party
■ Number of men visiting a room at regular intervals – a pimp may have arranged for men to visit the room where a child is being sexually exploited
■ A young girl/boy who appears withdrawn or tries to hide their face or appear afraid, disorientated or restricted from moving or communicating
■ Young girls who appear overly made up
■ Guests who access an excessive or unusual amount of pornography (TV or computer)
■ Individuals who appear to be monitoring public areas
- Number of adults visiting a room at regular intervals
- A young girl/boy who appears withdrawn or tries to hide their face or appear afraid, disorientated or restricted from moving or communicating
- Young girls who appear overly made up
- Guests who access an excessive or unusual amount of pornography (TV or computer)
- Individuals who appear to be monitoring public areas

**Risk Management Systems**
- Challenge 25 scheme including staff training, only accept photo ID (passport, driving licence or PASS logo)
- Encourage staff to make eye contact and engage in conversation to inquire about the reason for guests’ visit or stay
- Patrols (eg daily room checks walk hallways and the building perimeter)/CCTV monitoring
- Children and Young People’s risk assessment (should be undertaken in writing and the outcome should inform staff training, briefings and operating policy)
- Staff training and training records
- Restrict unregistered persons in guest rooms between 11pm and 7am
- Require visitors to use the main entrance to the premises
- Report suspicious activity to local police and record information in an incident log including credit card details, physical description, retain CCTV recordings, vehicle registration numbers, times of arrival/departure and findings/nature of concern
- Agree a protocol for responding to CSE with your local police team
- Establish a whistle blowing policy with staff
- Assign a responsible member of staff to act as a single point of contact / Safeguarding Co ordinator at the premises
Say Something if you see something FREE
Training sessions for Hotel staff working in ... hotels
 to tackle child sexual exploitation.

The training will be delivered by experts including the Police and agencies who work
with and support sexually exploited adults and children.

The sessions will be held on the following dates and times in ....

.
.
.

You will be notified of the venues for the training nearer the time.

The training is being offered to Managers and key front line staff such as
receptionists, porters, housekeeping and cleaners working in ... hotels.

The sessions will be held on a first come fist served basis. Each hotel initially will be
allowed to reserve ? places per session. If the sessions are over subscribed we will
endeavour to run more sessions in ....

If you wish to book places on this FREE training please complete the reply slip and
return it to ...

www.hertssafeguarding.org.uk
REPLY SLIP
Say Something if you see something
FREE training sessions

Please indicate with an X which training sessions you would like to attend.

<table>
<thead>
<tr>
<th>Name of participant</th>
<th>Date/Time</th>
<th>Date/Time</th>
<th>Date/Time</th>
<th>Date/Time</th>
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Please return the above reply slip to … by …  (Details overleaf)
### Information Report: Licensed Premises

**Newsagents, takeaways, pubs, hotels, night clubs, off licenses, etc**

<table>
<thead>
<tr>
<th>Date/time of Report:</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Person Submitting Report and Contact Details</td>
<td></td>
</tr>
</tbody>
</table>

Please provide as much information as possible about your concern, including any names, descriptions, addresses, dates/time

Information:

<table>
<thead>
<tr>
<th>How was the information obtained?</th>
<th></th>
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<tbody>
<tr>
<td>Witnessed by self</td>
<td></td>
</tr>
<tr>
<td>Report by fellow professional/colleague</td>
<td></td>
</tr>
<tr>
<td>Family/Friend/Member of Public</td>
<td></td>
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</tbody>
</table>

If the information was obtained from another person, please state how reliable you think they are.

<table>
<thead>
<tr>
<th>On a scale of 1 to 5:</th>
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<tbody>
<tr>
<td>1 = Unreliable</td>
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<tr>
<td>5 = Always reliable</td>
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</table>

If the information was obtained from another person, would they be willing to engage with the Police?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>If not, how?</th>
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</table>

If not, how could the Police engage them?

<table>
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<tr>
<th>How accurate do you believe the information to be?</th>
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<td>On a scale of 1 to 4:</td>
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<td>1 = Suspected to be False</td>
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<tr>
<td>4 = Known to be true beyond doubt</td>
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</tbody>
</table>

E-mail completed form to:  
Confidential

ONLY please.
# INFORMATION REPORT: LICENSED PREMISES

**Newsagents, takeaways, pubs, hotels, night clubs, off licences etc**

<table>
<thead>
<tr>
<th>Date/time of Report</th>
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<table>
<thead>
<tr>
<th>Person Submitting Report and Contact Details</th>
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</table>

Please provide as much information as possible about your concern, including any names, descriptions, addresses, dates/times.

**Information**

<table>
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<tr>
<th>How was this information obtained?</th>
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<table>
<thead>
<tr>
<th>Witnessed by self</th>
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<tr>
<th>Family/friend or member of public</th>
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</table>

If the information was obtained from another person, please state how reliable you think they are.

<table>
<thead>
<tr>
<th>[Insert recognised grading scheme here eg Police scale]</th>
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<tbody>
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</table>

If the information was obtained from another person, would they be willing to engage with the Police? If not how could the Police engage them?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>If not, how?</th>
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<tbody>
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</table>

How accurate do you believe the information to be?

<table>
<thead>
<tr>
<th>[Insert recognised grading scheme here eg Police scale]</th>
</tr>
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<tbody>
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</table>

E-mail completed form to: .............................................ONLY please.
Information Report to be faxed through to:

Date/Time of report: .................................................................

Details of Professional submitting:

<table>
<thead>
<tr>
<th>Name</th>
<th>Post / Job Title</th>
<th>Agency</th>
</tr>
</thead>
</table>

Contact Details

<table>
<thead>
<tr>
<th>Witnessed Incident</th>
<th>Professional</th>
<th>Member of the Public</th>
</tr>
</thead>
</table>

If the information was supplied by someone other than yourself, on a scale of 1-5 how reliable do you think they are?  
(5 = Always Reliable and 1 = Unreliable) .................................................................................................

How accurate is the information on a scale of 1-4?  
(4 = Known to be true beyond doubt to 1 = suspected to be false) ..........................................................

(If you are not able to say re above two questions please state ‘don’t know’ rather than guess)

If the information is from a 3rd party would they be willing to engage with the Police?  Yes  No

Does this information involve a licensed premise (e.g. newsagents, takeaways, pubs, off licenses, etc)?  Yes  No
If yes, please provide the trading name and address of premise:
....................................................................................................................................................

Please provide clear and accurate information: Include as much detail as possible re names/descriptions/nicknames/vehicle details/addresses etc: If providing details of specific incidents please put a date and time these were witnessed

Concern about Licensed Premise:

Please fax a copy of this report through to ........................................on..........................................
If you are internal or have access to secure e-mail then you can forward a copy of this report to .................................................................
# Vetting Employees and Volunteers: Risk Assessment Checklist

This checklist guide should be used as a guide prior to employees or volunteers starting work at your premises. Its purpose is to help you identify the level of vetting required prior to recruitment and so that you can record what actions you have taken to ensure safe recruitment. This form should be retained as part of your ‘due diligence’ records.

<table>
<thead>
<tr>
<th>Pre-recruitment checks</th>
<th>Task Completed</th>
<th>Date Completed</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information included in the advert or job description that vetting checks and references are required (for example roles that are regulated or involve unsupervised contact with children; for further advice contact your Local Safeguarding Children Board or Government websites such as the government Disclosure and Barring Service (DBS))</td>
<td></td>
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</tr>
<tr>
<td>Application form checked for gaps or inconsistencies</td>
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<tr>
<td>Two satisfactory written references received</td>
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<td>--------------------------------------------</td>
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<tr>
<td>Proof of ID obtained and copied (including one form of photo ID)</td>
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<tr>
<td>Permission to work in the UK checked and documented</td>
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<tr>
<td>Original qualifications seen and copied (eg SIA card, Personal Licence)</td>
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</tbody>
</table>
| **Safeguarding Checks**  
If the applicant has disclosed previous relevant convictions / cautions please consider: |  |  |
<p>| Candidate has made you aware of the nature of the conviction / caution and you do/do not feel this poses a risk to the safety of children/young people or staff/volunteers |  |  |</p>
<table>
<thead>
<tr>
<th>The conviction/caution does not automatically bar the candidate from working with children and young people</th>
</tr>
</thead>
<tbody>
<tr>
<td>A risk management process can be operated</td>
</tr>
<tr>
<td><strong>For all employees / applicants please consider:</strong></td>
</tr>
<tr>
<td>Does the post require unsupervised access to children / young people?</td>
</tr>
<tr>
<td>In the course of such duties can the employee always be observed or supervised by another who has been DBS checked?</td>
</tr>
<tr>
<td>Does the post require employees to work in a remote / out of sight location?</td>
</tr>
<tr>
<td>Question</td>
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<tr>
<td>-------------------------------------------------------------------------</td>
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<tr>
<td>Does the employee have access to keys that grant unsupervised access to the building out of hours?</td>
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<tr>
<td>Will the employee be providing personal care to children?</td>
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<tr>
<td>Will the employee be responsible for escorting to the toilet?</td>
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<tr>
<td>Will the employee have potential for contact with children away from the business/organisation working hours?</td>
</tr>
<tr>
<td>Does the employee live on site?</td>
</tr>
<tr>
<td>Is training required for others in relation to supervising the employee (eg a trained Children’s Safeguarding Co ordinator)</td>
</tr>
</tbody>
</table>

[www.hertssafeguarding.org.uk](http://www.hertssafeguarding.org.uk)
<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Does the employee require supervision prior to the return of satisfactory DBS disclosure?</td>
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<tr>
<td>Does the employee require ongoing supervision once employed?</td>
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<tr>
<td>Do you have a <strong>Whistleblowing Policy</strong>? If staff are concerned about a colleague or any other individual in relation to the protection of children from harm?</td>
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</table>

**Completed by:**  

........................................................................................................................................................................

**Signed:**  

........................................................................................................................................................................

**Date:**  

........................................................................................................................................................................
CODE OF CONDUCT

When serving or delivering non-age restricted goods to unaccompanied children and young people

This guidance aims to promote good safeguarding practice in local business that involves the serving or delivery of food of non age restricted products to children and young people, over the counter or to a residential or other location. It is recommended that premise licence holders, business managers and staff/drivers are trained to observe the following:

- All drivers should sign in and out of a shift register and confirm the registration number of the vehicle in use.

- When making a delivery, photo-identification should be produced to the child/young person.

- Staff should remain professional at all times and should not:
  - Touch a child/young person
  - Make offensive or inappropriate comments (such as the use of swearing or sexualised language)
  - Attempt to misuse personal details obtained via the business about a child (for example communicating with a child at their postal address, or by social network, internet or mobile telephone or by using any other information disclosed as part of placing or delivering an order or obtained by any other aspect of the business).

- A log should be maintained by drivers when a service has been made to a sole child/young person including the details of any incidents occurring/actions taken.

- If the member of staff is concerned about the safety, welfare or behaviour of a child, s/he should report this to the local Community Youth Team Officer, or police (if it is an emergency dial 999) or Children’s Social Care Services and to the shop manager and the nature of the concern and actions taken should be recorded in the incident log.

The above should apply to children who are associated with the business because they are living, working, or socialising there or if they are customers of the business.
GUIDANCE FOR PREMISE LICENCE HOLDERS

When food or similar non-age restricted goods are delivered to unaccompanied children and young people

This guidance aims to promote good safeguarding practice in local businesses that involve the delivery of food, or other similar non-age restricted goods, to children and young people. It is recommended that the premise licence holder/premise manager implements the following:

- A children and young people’s risk assessment should be undertaken and this document should be retained in writing. This should inform your operating policy and staff training in relation to the protection of children from harm.

- All staff, including delivery drivers, should be trained and staff training records should be maintained.

- Employment records should be maintained for delivery drivers, including name, address, date of birth, national insurance number/documentation giving permission to work in the UK, contact telephone number and vehicle registration numbers; proof of identity.

- Drivers should be required to sign in an out of a register at each shift and these registers should be maintained as part of your due diligence records.

- Drivers should be required to adhere to a Code of Conduct to promote safe practice in relation to children and young people.

- Drivers should be required to produce photo-identification to the child/young person, at the point of delivery.

- Delivery workers should remain professional at all times and should not:
  - Touch a child/young person;
  - Make offensive or inappropriate comments (such as the use of swearing or sexualised language);
  - Attempt to misuse personal details obtained via the business about a child (for example communicating with a child at their postal address, or by social network, internet or mobile telephone or by using any other information disclosed as part of placing or delivering an order or obtained by any other aspect of the business).

- Records should be maintained of any disciplinary action taken against drivers who breach the Code of Conduct for safeguarding children.
- A whistle-blowing policy should operate to encourage the reporting of persons who breach the Code of Conduct for safeguarding children.

- A log should be maintained by drivers when a delivery has been made to children/young persons who are not under the supervision of a responsible adult, including the details of any incidents occurring/actions taken.

- If the driver is concerned about the safety, welfare or behaviour of a child, s/he should report this to the police (if it is an emergency dial 999) or Children’s Social Care Services ...... and to their manager and the nature of the concern and actions taken should be recorded in the incident log.

The above should apply to children who are associated with the business because they are living, working, or socialising there or if they are customers of the business.
SAFEGUARDING CHILDREN & THE LICENSING ACT 2003
RISK ASSESSMENT EXERCISE FOR SAFEGUARDING CHILDREN AND YOUNG PEOPLE

When doing a risk assessment you should consider ALL children under the age of 18, who have may have access to the premises including children who live, socialise, work or perform at the premises.

To complete the risk assessment, think about what activities take place at your premises and what risks there might be to children and young people. Enter the risks the left hand column and record how each risk will be managed in the right hand column. (See the example below). Please make sure that staff are trained to be aware of the risks and how they should respond if a safeguarding issue arises.

<table>
<thead>
<tr>
<th>RISK</th>
<th>HOW THE RISK WILL BE MANAGED</th>
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<tbody>
<tr>
<td>Alcohol is on sale – risk of underage drinking; risk of proxy sales; risk of inappropriate behaviour if adults are drinking.</td>
<td>Operate challenge 25 including a refusal log. Manager to regularly check the refusals log. Make sure staff are trained. Keep staff training records that are signed and dated. Put signage in place. Staff to regularly patrol the premises to check for proxy purchase and dangerous/inappropriate behaviour. Signage in place about the law and proxy sales.</td>
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<tr>
<td>Customers of mixed age groups and children often play in the outside area or wander about the premises</td>
<td>Make sure children are always accompanied and supervised by a responsible adult. Display and enforce the Children’s Charter or similar signage Staff trained to be aware of customer activity Regular patrols / CCTV monitoring Only staff who are qualified/suitably vetted will have one to one supervision or responsibility for a child Restrict access to a designated family area1 Zero tolerance to drugs policy will be enforced and signage displayed</td>
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<tr>
<td>Risk of adults failing to supervise their children</td>
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<tr>
<td>Risk of child sexual exploitation</td>
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<td>Risk of accidental harm to the child</td>
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<tr>
<td>Risk of child being exposed to criminal, dangerous or inappropriate adult behaviour</td>
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<tr>
<td>Your premises attracts unaccompanied young people</td>
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<tr>
<td>Risk of a vulnerable young person being in difficulty at your premises (for example intoxicated or otherwise distressed)</td>
<td>Follow the protocol/policy for responding to vulnerable young people at your premises (please specify what this is or attach a copy to the risk assessment for reference) Monitor activity using CCTV/regular patrols Report individuals of concern to the Police or ‘Crimestoppers’ (for anonymity) and make CCTV recordings available. Staff will be trained to identify and respond to child sexual exploitation concerns.</td>
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<tr>
<td>Risk of inappropriate relationship developing/grooming between a young person and staff</td>
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<tr>
<td>Risk of adults bringing young people to your premises as part of grooming or child sexual exploitation</td>
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Please consult with the Health Protection Service if you need advice about designating a suitable family area

www.hertssafeguarding.org.uk
WHAT TYPE OF PREMISES DO YOU WORK AT?  
(Eg Pub, off licence, shop, night club, social club, sports stadium, sports bar, hotel, community hall, department store, park, outdoor event, school, hotel)

WHAT TYPE OF ACTIVITIES TAKE PLACE AT THE PREMISES AND WHO IS YOUR CUSTOMER BASE?  
(Eg are their sports sessions, play areas, do people come to shop, drink? Are customers all over 18? Are there educational lessons there? Any live entertainment? Do you hold children’s parties or events eg birthdays, Christmas, or Under 18’s events?) Do you employ or allow under 18’s to help out? Do people bring cameras/mobile phones to your premises? Are their overnight facilities? Do you host private parties? Do you issue guest or VIP passes? Are there unaccompanied children or young people at your premises?

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<tr>
<th>RISK</th>
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<tr>
<td>NAME OF PERSON COMPLETING THE RISK ASSESSMENT</td>
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<tr>
<td>ROLE (EG DESIGNATED PREMISES SUPERVISOR, LICENCE HOLDER, MANAGER ETC)</td>
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<tr>
<td>DATE COMPLETED</td>
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<tr>
<td>DATE STAFF TRAINED</td>
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</table>
SAMPLE PROTOCOL
UNACCOMPANIED CHILD UNDER TEMPORARY SUPERVISION OF PREMISES STAFF

Name of Premises:  Address:

Date of incident:  Time:

Name of Child:  Age/DOB:
Name of Parent/Guardian:  Telephone No:
Home address:

Has the child got a mobile phone? Yes / No
Have you checked for an Emergency Contact Number? Yes / No

Description of Child’s Appearance:
Male/Female:  Approx. age:  Approx. height:  Ethnicity:
Hair colour and length:  Clothing:

Time and circumstances under which the child was received under staff supervision:
(include information about why the child requires assistance and any information you have gathered eg their intentions/plans for the evening/travel arrangements to/from venue, are they alone/with friends etc)
SAMPLE PROTOCOL

Name of person completing this form: 
Job title/position: 

(Please circle actions/options taken)

1. Child returned to parent/carer
   Time discharged:
   Name of parent/carer
   Signature of parent/carer

2. Contacted parent/carer by telephone
   Response of parent/actions agreed

3. Unable to contact parent/carer (as a guide, one hour should be the maximum time before notifying the police or social services)

4. Request Ambulance and discharged child to hospital 1
   Time discharged:

5. Request local police assistance
   Time requested:
   Name of Police Officer:

OR, if no local police response and the vulnerable child remains under your supervision

6. Notify Police HQ (insert tel no) and contact Childrens Social Care Services (insert tel no) to request assistance
   Name of Police Officer: Name of Social Worker:
   Time requested:

7. Child collected by Police Officer/ Social Care Services Officer
   Name of Officer
   Signature of Officer

8. If no response after 1 hour, by Childrens Social Care Service or the Police, child escorted by appropriate staff to nearest police station as follows:

1 ONLY in cases where the child requires medical attention eg, due to intoxication or ill health, or physical harm
2 Premises manager/lead for safeguarding should contact Social Care Services in addition to Police to notify them of the situation and that their service may be required if Police issue a Police Protection Order
SAMPLE PROTOCOL

Name(s) of escort(s) ____________________________________________

Address of police station: ________________________________________

Signature of Escort _____________________________________________

Signature of Police Officer: ______________________________________

Signature of person completing this form: __________________________
# RECORD OF INTERVENTIONS IN RELATION TO CHILDREN AND YOUNG PEOPLE

**NAME & ADDRESS OF PREMISES**

| Date | Time | Name of Staff | Name of Duty Manager | Issues identified and action taken by premises management  
(for example child/young person at risk due to underage drinking, persons they are associating with, engaging in adult or age restricted activity, young person is unaccompanied or otherwise vulnerable. Please include information about action taken such as contact with Police, incident number, record of vehicle registrations etc). |
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MULTI-AGENCY TACKLING UNDERAGE SALES GROUP

Criteria for a Recognised Proof of Age Scheme

This guidance was produced by the Sheffield ‘Tackling Underage Sales Group’, a strategic partnership between the Licensing Authority, City Council Trading Standards, South Yorkshire Police and the Sheffield Safeguarding Children Board. Its purpose is to clearly set out the criteria that licensees and their staff are expected to meet in order to operate a proof of age scheme that is recognised and approved by the authorities in Sheffield.

For a proof of age scheme to be recognised and approved, it must seek to prevent the sale of all age restricted products, including alcohol, tobacco and adult magazines/publications and must operate the following components:

Proof of Age must be requested if staff suspect that the customer is under the age of 18 years. To assist staff, the ‘Challenge 21’ rule or similar should be applied. This means that if a customer appears to be under 21 years of age staff must ask them to prove they are over 18. Documents acceptable as proof of age must have a photograph of the holder plus a date of birth, ie passport, driving licence or an ID card featuring the ‘PASS’ hologram. If the customer cannot prove they are old enough, the sale must be refused.

Refusals Register – when a refusal is made this must be recorded, using a written log book or till prompts. Written records should include the date and time of the refusal, the product the young person attempted to buy, a physical description of the customer and any other significant comments (for example if the incident was reported to the police; customer confrontation). The refusals register should be kept near the till. Till prompts/refusals registers should be retained made available to the authorities for inspection on request. Refusals records should be regularly checked by the premises management to ensure staff are completing them properly and to help management identify staff training needs.

Signage to publicise the scheme should be prominently displayed throughout the premises, particularly in alcohol display areas and around the till. This alerts customers to the fact that they may be asked to prove their age and can help staff to diffuse confrontations by transferring the blame on to the scheme/law. Signage also reminds staff to ask for proof of age.

Staff training – staff should receive induction training prior to selling age restricted goods and refresher training must be delivered regularly. Training records must be maintained and detail: the content of the training*, date, name and qualifications of the trainer, signatures of the trainer and trainee. Training records must also include evidence that the trainee has knowledge/understanding of the training (for example, a test or quiz, completed and signed by the trainee).

*The content of the training must include: the law in relation to young people and alcohol/age restricted goods; what are age restricted goods; how to monitor for proxy purchase; the penalties for making an underage sale; how to make a refusal; how to record a refusal; types of acceptable ID and how to check it; the four core objectives of the Licensing Act 2003 and the premises policy for meeting the core objectives to ensure the premises operates legally and responsibly to prevent underage sales.

Please note: Membership of the Responsible Retailer scheme will help you to fulfil this criteria and comply with the Challenge 21 scheme. If you wish to join the scheme contact ....
# REFUSALS RECORD

Please keep a record every time the sale of alcohol is refused and the reason why (for example unable to provide suitable ID; suspected underage; person appears intoxicated)

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Product</th>
<th>Description of person(s) refused</th>
<th>Reason for refusal</th>
<th>Name of staff</th>
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Monitored by __________________________________________ (Manager/Supervisor) Date ____________________
## PATROL RECORD

**NAME & ADDRESS OF PREMISES**

**ISSUES CHECKED ON EACH PATROL** (please circle relevant checks):
- Parent/carer supervision of children
- Underage drinking / Proxy purchase
- Substance Misuse/Dealing
- Anti Social Behaviour
- Compliance with licence conditions
- Other (please specify)

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Staff Initials</th>
<th>Areas checked</th>
<th>Issues identified and action taken by premises management</th>
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