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# Guidance Document

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Partnership Operations to  
Disrupt Child Sexual  
Exploitation

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## What is Child Sexual Exploitation?

There are a number of definitions of Child Sexual Exploitation, including those developed by the Department for Education, Association of Chief Police Officers, Barnardo's and the National Working Group. All offer a comprehensive definition for use by professionals. In Greater Manchester, Project Phoenix has chosen to use the definition which was developed by the Children's Society in collaboration with young people which is as follows:

*"Someone taking advantage of you sexually, for their own benefit. Through threats, bribes, violence, humiliation, or by telling you that they love you, they will have the power to get you to do sexual things for their own, or other people's benefit or enjoyment (including: touching or kissing private parts, sex, taking sexual photos)."*

## What does disruption activity mean in relation to Child Sexual Exploitation?

There are a number of ways in which local authorities, police and other key partners can reduce the prevalence of Child Sexual Exploitation. Project Phoenix is committed to the four Ps in relation to tackling Child Sexual Exploitation:

- Prevent the abuse from happening;
- Protect young people who are victims or at-risk of sexual exploitation;
- Prosecute offenders wherever possible;
- Publicise this activity, including how people can report Child Sexual Exploitation.

Disruption activity is linked to the prevention strand of this activity. Disruption usually involves agencies working in partnership to target a location at which it is suspected that Child Sexual Exploitation is taking place, with the common objective of gathering information and intelligence about that location and taking steps to reduce the likelihood of a child or young person becoming a victim there. Often the location in question is a premise or group of premises frequented by both young people and adults. This could be a residential property, shop, takeaway, off license, shisha bar or other similar premise.

## Who are the key partners in relation to disruption activity?

The following is a list of agencies and services that have powers available to them in relation to some of these locations and premises that means they could participate in this disruption activity. This list is by no means exhaustive and does not include organisations from the private and voluntary sectors who could also play a key role in disruption activity (although consideration should be given to how information and intelligence in relation to Child Sexual Exploitation is shared with these organisations). It is important to note that whilst the police are a key partner in this work, disruption activity should not be seen as a police operation to which other agencies contribute. All partners have something to gain from disruption activity and as such ownership should be shared rather than being the responsibility of the police.

- Police (including neighbourhood policing, public protection, detectives, etc.);
- Social workers;
- Fire and Rescue Service;
- Housing providers;
- Trading standards;
- Local authority licensing;
- Local authority planning;
- Community safety;
- Youth offending service;
- Department for Work and Pensions;
- Benefit fraud investigations;
- HM Revenue and Customs;
- UK Border Agency.

## What powers do these partners have?

AGENCY	SUMMARY
<p>Greater Manchester Fire &amp; Rescue Service (GMFRS)</p>	<p>Within GMFRS the key contacts are in the Fire Protection Department. Each district of Greater Manchester has Fire Protection Officers that act as the most appropriate point of contact for disruption activity and targeted operations.</p> <p>Statutory Legislation – The Regulatory Reform (Fire Safety) Order 2005 which covers all premises other than dwellings which includes hospitals, shops, offices, factories, warehouses, places of public assembly, churches, mosques, sheltered accommodation, care homes, HMOs and common areas of blocks of flats.</p> <p>General fire safety requirements are as follows:</p> <ul style="list-style-type: none"> <li>• The duty of the responsible persons to take general fire precautions.</li> <li>• Provide a suitable and sufficient fire risk assessment.</li> <li>• Eliminate or reduce the risk from fire and from dangerous substances.</li> <li>• Provide adequate emergency routes and exits, firefighting and detection, emergency lighting and training.</li> <li>• The provision of information to employees.</li> <li>• Cooperation and coordination between relevant persons sharing responsibility for multi occupied premises.</li> </ul> <p>If the outcome of an audit inspection is deemed unsatisfactory the responsible person will either be notified of minor deficiencies or enforcement action applied to support the premises in meeting the relevant fire safety standard. If the contravention is deemed so serious where <b>death or serious injury to persons may occur</b> then prohibition of use and prosecution may follow.</p>
<p>Local Authority Planning Department</p>	<p>Every Local Authority has Planning Enforcement Officers, whose role is to investigate breaches of planning control including unauthorised buildings, unauthorised uses of land and buildings, the regular monitoring of developments for which planning permission has been granted to ensure compliance with the terms and conditions of a planning permission, untidy land, illegal advertisements and the illegal stationing of caravans on land, initiate action and co-ordinate activity to secure removal.</p> <p>Upon investigating alleged breaches of planning control Enforcement Officers must make an assessment of the impact of the development or change of use in order to recommend the appropriate course of action to be taken to either regularise the breach or to update the complainant with the reasoning behind the Local Authority not taking any further action. Enforcement Officers are required to advise before taking action to protect and enforce.</p> <p>It is imperative to ensure an auditable trail of actions and that those actions are based upon the law, government guidance and evidence. Discussion and negotiation does not end when enforcement action has been authorised any more than a planning application ends with the issue of the permission. Ultimately it is the cessation of the breach that is important and an amicable solution the preferred option.</p> <p>Planning Enforcement Officers can only investigate breaches of planning legislation. If</p>

	<p>the work which has been carried out does not need planning permission, or if the works have been carried out in accordance with a planning permission, enforcement action cannot be taken. Also, some matters do not fall within the scope of either development control/planning services and therefore cannot be investigated, for example:</p> <ul style="list-style-type: none"> <li>• noise complaints;</li> <li>• highway related issues;</li> <li>• operating a business from home where the main use is as a residence and this does not cause local problems;</li> <li>• parking a caravan within the boundary of a residential property provided that it is ancillary to the dwelling (for example, if it is stored);</li> <li>• parking of commercial vehicles on the highway, even in residential areas;</li> <li>• boundary disputes;</li> <li>• covenant issues.</li> </ul> <p>Planning Enforcement Officers tend not to actually enter a property, instead they observe works carried out to extend or alter the exterior appearance of the building or matters concerning the surrounding land.</p>
<p>Public Protection Teams</p>	<p>Local Authority Public Protection Teams comprise the three functions formerly known as:</p> <ul style="list-style-type: none"> <li>• Trading Standards;</li> <li>• Environmental Health;</li> <li>• Licensing.</li> </ul> <p>There are numerous detailed and specific powers available to Public Protection Teams as defined in numerous forms of government legislation. These powers can best be summarised as being access to trade premises during business hours, usually without giving notice. Typically, this would involve visits to premises for routine inspection, for example: food safety, health and safety, compliance with licensing conditions, etc. Alternatively, such powers may be invoked where there is a suspicion that criminal offences are being committed and the goods may need to be seized as evidence, for example due to counterfeiting or because of poor product safety. This access to trade premises without warning is a particularly useful and unique addition to any disruption operation and activity.</p> <p>On entering a premise, officers from Public Protection Teams will look for evidence of:</p> <ul style="list-style-type: none"> <li>• Is there a CCTV system and is it properly working?</li> <li>• Presence of children in the shop or in the vicinity, which may suggest CSE.</li> <li>• Presence of beds, similar furniture, pillows, bedding, etc. in offices in the premises.</li> <li>• Blocked fire escapes.</li> </ul> <p>Some examples of the types of things other agencies should look for and report into Public Protection Teams if they're not present are:</p> <ul style="list-style-type: none"> <li>• Food being kept or prepared in unhygienic manner.</li> <li>• Unsafe situations or clear health and safety breaches, such as loose electrical cables.</li> <li>• Possible breaches of licence conditions, for example defective CCTV, licence not</li> </ul>

	<p>properly displayed, etc.</p> <ul style="list-style-type: none"> <li>• Presence of any consumer items which look obviously unsafe or counterfeit.</li> </ul>
<p>Local Authority Revenues &amp; Benefits Team</p>	<p>Local Authority Revenues and Benefits Teams predominately deal with Benefit Fraud in relation to Housing Benefit &amp; Council Tax Benefit, as well as investigating DWP benefits such as Job Seeker’s Allowance and Disability Living Allowance under the Welfare Reform Act 2007. Council Tax single person’s discount, Direct Payment Fraud and Disability Blue Badge fraud are also investigated by this team.</p> <p>Each Benefit Fraud Investigator is an authorised officer in accordance with the Social Security Administration Act 1992. They can exercise powers under Sections 109b and 109C in respect of Housing Benefit and Council Tax Benefit. In addition they can exercise such powers under The Council Tax Reduction Schemes (Detection of Fraud and Enforcement) (England) Regulations 2013.</p> <p>Under the above powers an employer is legally required to provide any information requested about employees such as wage details, bank details, next of kin, National Insurance number, date of birth, period of employment, address, etc.</p> <p>Information can also be legally requested under the Social Security Fraud Act and this team can obtain information from banks or utility companies via the National Anti-Fraud Network. Additional information can be accessed via DVLA, Credit Checking Agencies, the Land Registry, Companies House and the Electoral Register.</p> <p>Benefit Fraud investigators do not hold powers of entry and would have to work with the police to obtain a warrant to gain entry to a premise.</p> <p>During the course of a Fraud Investigation officers may apply for permission through RIPA to conduct surveillance, mindful to meet the criteria of the Protection of Freedoms Act 2012</p> <p>As part of a Fraud Investigation, visits may be undertaken to properties to speak with the occupants who either reside or work there. As part of this visit officers are asked to pay particular attention to the following:</p> <ul style="list-style-type: none"> <li>• Number of people occupying the property;</li> <li>• Information on people in the property and their personal details, such as their names, dates of birth, etc.;</li> <li>• Details of the landlord or letting agent;</li> <li>• The condition of the property, particularly to gauge whether the occupants are living in poor or uninhabitable conditions;</li> <li>• The presence of any children of school age in the property, particularly during school time;</li> <li>• Any welfare issues with the occupants;</li> <li>• Any signs of illegal activity, for example the presence of drugs;</li> <li>• Any health and safety concerns, such as the absence of a smoke alarm;</li> <li>• Information or intelligence from neighbours, such as noise nuisance.</li> </ul> <p>There are many examples of how working jointly with Benefit Fraud investigators can reap benefits for other partner agencies and organisations. Often the Benefit and Revenues Team will hold information about individuals and families in relation to the benefits they’re claiming which would be useful to other partners, in particular the police. If Benefit Fraud Investigators become aware of a property which is empty or</p>

	<p>is a House of Multiple Occupancy then this information is routinely shared with the landlord, GMFRS, Strategic Housing, etc.</p>
<p>Strategic Housing – Private Rented Sector Service</p>	<p>Statutory Legislation exists in the form of the Housing Act (2004 Parts 1-4) which applies to all residential premises within an area to deal with both property conditions affecting the health &amp; safety of its occupants and the management of such premises. This legislation can be applied to any premise that is being used for residential purposes, for example domestic dwellings, commercial, outbuildings, etc. It can also be applied to deal with empty dwellings.</p> <p>The Local Housing Authority (LHA) has a duty to:</p> <ul style="list-style-type: none"> <li>• Inspect the condition of all housing stock within its area.</li> <li>• Deal with category one hazards and has the power to deal with any category two hazards found within a residential premise and has a range of enforcement powers including powers of entry available to them to carry out this function.</li> <li>• Licence all mandatory Houses of Multiple Occupation (HMOs) within its Borough (HMOs are when five or more unrelated people are living in three or more storeys of a premise).</li> </ul> <p>The LHA has the power to apply for Management Orders for certain types of residential premises including empty properties to bring them back into use.</p> <p>The Protection from Eviction Act (1977) states that: Failure of a landlord to follow civil procedures to seek possession of their property is a criminal offence and the Local Authority has the power to prosecute.</p> <p>Assured shorthold tenants enjoy considerable security of tenure and protection against harassment. Actions such as verbal abuse, physical abuse, withdrawal of services such as electric, entering the property without consent are all acts that could constitute harassment.</p>
<p>Community Safety / Anti-Social Behaviour Service</p>	<p>Since receiving Royal Assent in March 2014, the Anti-Social Behaviour, Crime and Policing Act (2014) gives local authorities and its partners the following tools and powers that may be used to against a person or premise:</p> <ul style="list-style-type: none"> <li>• Injunction to Prevent Nuisance and Annoyance</li> <li>• Criminal Behaviour Order</li> <li>• Police Dispersal Power</li> <li>• Community Protection Notice</li> <li>• Public Spaces Protection Order</li> <li>• Closure Power</li> </ul> <p>The Local Authority has other enforcement tools and powers at its disposal, such as those contained within the following pieces of legislation:</p> <ul style="list-style-type: none"> <li>• Environmental Protection Act (1990) with regards to fly-tipping (s33); domestic and commercial waste obligations (ss34, 46 and 47); deposits of waste on land (s59); waste receptacles (s60); and litter (s87 and subsequent sections relating to control notices).</li> <li>• Clean Neighbourhoods and Environment Act (2005) with regards to nuisance</li> </ul>

	<p>vehicles including vehicles advertised for sale on the highway (s3 and subsequent sections); and abandoned vehicles (s10 and subsequent sections).</p> <ul style="list-style-type: none"><li>• The Dogs (Fouling of Land) Act in relation to individuals who fail to clean up after their dog after it has fouled.</li><li>• The Town and Country Planning Act (1990) and the Highways Act (1980) in relation to abandoned vehicles (also the Refuse Disposal (Amenity) Act 1978) and fly-posting.</li><li>• The Prevention of Damage by Pests Act (1949) with regards to accumulations of waste on private land.</li><li>• The Public Health Act (1936) with regards to accumulations of waste in an alley or passageway.</li><li>• The Control of Pollution (Amendment) Act (1989) with regards to the transportation of controlled waste (s5).</li><li>• Environment Act (1995) (s108) with regards to entry onto land and requiring information.</li></ul>
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## Information & intelligence gathering

Effective sharing of information between professionals and local agencies is essential in identifying, assessing and providing services to children and young people, as well as identifying and targeting perpetrators at the earliest opportunity.

Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. To ensure effective safeguarding arrangements:

All organisations should have arrangements in place which set out clearly the processes and the principles for sharing information between each other, with other professionals and with the LSCB and no professional should assume that someone else will pass on information which they think may be critical to keeping a child safe. If a professional has concerns about a child's welfare and believes they are suffering or likely to suffer harm, then they should share the information with local authority children's social care.

If any professional has information about child sexual exploitation then they should consider one of the following responses:

1. If a child is deemed at immediate risk of significant harm i.e. physical, sexual, emotional harm or neglect, then they should contact the police on 999 and provide as much information as possible so that police can put in place an immediate response.
2. If at any time it is considered that the child may be a child in need as defined in the Children Act 1989 (his or her health or development is likely to be significantly impaired, or further impaired, without the provision of services from the local authority), or that the child has suffered significant harm or is likely to do so, a referral should be made immediately to local authority children's social care. This referral can be made by any professional.
3. If the information is not about a child in immediate or near danger then the professional should fill in the information report listed below and e-mail to the appropriate child sexual exploitation team. A list of email addresses is also attached. There are currently nine geographical specialist teams and the information should be forwarded to the local team appropriate to the intelligence i.e. information about a Manchester City Centre takeaway would go to Phoenix – Protect. Examples of this type of information would include details of suspicious persons approaching young people in parks, registration numbers of vehicles, mobile phone numbers of suspects, etc.
4. There will also be occasions where the police will send out requests for information on persons of interest as part of their investigations or proactive disruption work. When an organisation receives such a request they should provide the following information (in line with their own information sharing protocols):
  - Name / Nicknames;
  - Dates of birth;
  - Occupation;
  - Addresses;
  - Telephone numbers;
  - Vehicles associated;
  - Persons associated;
  - Business interests;
  - Documents signed by person;
  - Dates and times of incident / person spoken to.

For information and intelligence relating to options 3 and 4 above, professionals should complete the form below and email this to the most appropriate specialist CSE team as follows:

Area	Email Address	Telephone Number
Bolton	Phoenix.Exit@gmp.police.uk	01204 337195
Bury	buryphoenix.cse@gmp.pnn.police.uk	0161 856 8002
Manchester	protect.team@gmp.police.uk	0161 856 6020
Oldham	Operation.Messenger@gmp.police.uk	0161 856 4552
Rochdale	sunrise.rochdale@gmp.pnn.police.uk	0161 856 3376
Salford	protect.team@gmp.police.uk	0161 856 6020
Stockport	Phoenix.stockport@gmp.pnn.police.uk	07810 832457
Tameside	cse.tameside@gmp.pnn.police.uk	0161 856 5880
Trafford	phoenix.trafford@gmp.pnn.police.uk	0161 856 7782
Wigan	WiganPhoenixCSETeam@gmp.police.uk	07818 510492

### Guidance for CSE teams for sharing information and intelligence

The information report (contained at the end of this document) should be sent direct to a secure police email address which will only be viewed by specialist CSE police officers. This will ensure that the national intelligence model is adhered to and the source of information will be protected. The police officer will input this information onto the Force Intelligence System (FIS) where the source of the information will be named and it will be referred to the dedicated handling unit.

The email will also be included in the location section of the original notes. All emails need to be stored in a folder in case of an audit trail for future investigation and disclosure procedures. Officers should include in the body of text that it needs to be for the specialist team supervisor only so that the Force Intelligence Officer doesn't hand this to the Integrated Neighbourhood Policing Team, which may result in work being duplicated.

Depending on the importance and the rating of the intelligence, a decision will be made by the supervising police officer of the specialist team and force intelligence officer how to proceed. A range of actions may be taken including investigation, proactive disruption or simply recording of information for future use.

There is a responsibility on the specialist police teams, when appropriate, to feedback to the referrer what has happened with the intelligence so that a flow of information is maintained. It is important that the police recognise and encourage the efforts made by partner agencies to provide information and intelligence and without timely and appropriate feedback by police officers this relationship may not be maintained.

### Mapping the problem

It is critical that all information in relation to the patterns of exploitation to which children are subjected are captured and used to build a problem-profile. The most effective problem-profiles for Child Sexual Exploitation are those which are compiled with the oversight of the Local Safeguarding Children's Board and which have the involvement of a broad range of partners involved in community safety and child safeguarding. Identifying analytical capacity is important, as is giving the analyst a clear brief and access to various datasets, including (but not exclusively):

- Children's Services' assessments of children and young people.

- Intelligence on local street gangs including their structure, inter connections and the mapping of the females associated with them.
- Intelligence on local businesses, particularly those which may attract children and young people and/or perpetrators (e.g. off licenses, shisha bars, hotels, bed and breakfasts, etc.)
- Intelligence on local prostitution and drugs markets.
- Information relating to local residential children’s homes and the young people residing there.
- Appropriate data from schools.
- Intelligence in relation to parks and open spaces, particularly where young people are known to congregate.
- Data from licensing and trading standards in relation to licensed premises where Child Sexual Exploitation may be taking place.

A comprehensive problem-profile will support the intelligence-led deployment of partnership resources to effectively disrupt Child Sexual Exploitation.

## Information Report

It is crucial that all information and intelligence in relation to CSE is recorded as accurately and with as much detail as possible, particularly if it is likely to be used to seek a conviction against an offender or a group of offenders. Please consider the following when completing this form:

- The time and date that you became aware of this information.
- The time and date of when the incident occurred (if different to above).
- Who the information is from, including their full name, date of birth, addresses and contact details (if you have them).
- How did this information come to light? I.e. at a strategy meeting, through a CAF, during a home visit, from a third party, via a relative, etc.
- Who else is aware of this information and has it been recorded elsewhere (this is critical as disclosure of this information may pose a risk to that person)?

**Please note this is not an exhaustive list and you should always use your professional judgement.**

<b>Date/Time of report</b>					
<b>Your Name</b>					
<b>Your Job Title</b>					
<b>Your Organisation</b>					
<b>Contact details</b>					
<b>Witnessed Incident</b>		Member of Public		Other Professional	

**If the information was supplied by someone other than yourself, on a scale of 1-5 how reliable do you think they are?**

You are also being asked to make an assessment of the reliability of the person providing the information. This is to allow the police to assess the value of the intelligence and will be treated as confidential. It will be subjective but please try and be as accurate and reliable when making this assessment and please do not guess if you don't know the answer.

(1 = Always Reliable to 4 = Unreliable, 5 = cannot be judged/Untested)

**How accurate is the information on a scale of 1-5?**

(1 = Known to be true beyond doubt to 4 = suspected to be false, 5 = cannot be judged)

**If the information is from a 3rd party would they be willing to engage with the Police?**

**YES / NO / DON'T KNOW (please circle one answer)**

***Please include as much detail as possible regarding names/descriptions/nicknames/vehicle details/addresses etc.:***