

Preventing & Tackling Exploitation Spotlight Review

March 2020

1. Recommendations

1.1 The Spotlight Review asks the Corporate Infrastructure & Regulatory Services (CIRS) Scrutiny Committee and Cabinet to endorse and action the recommendations below. Members request that an update on the progress of the recommendations should be brought back to the Corporate Infrastructure & Regulatory Services Scrutiny Committee in six to nine months' time.

	RECOMMENDATIONS	WHO
1	BUILD GREATER RESILIENCE IN CHILDREN AND YOUNG PEOPLE	
	(a) All primary, secondary and special schools in Devon (including maintained schools, academies, free schools and independent schools) to deliver a quality, age/ability appropriate PHSE curriculum, which has a key focus on the risks and dangers of all forms of exploitation, identifying and forming healthy relationships and building self-esteem and resilience.	All Devon schools
	(b) A greater investment in both targeted and open access youth services across the County, to be jointly developed and funded by Devon County Council, Devon & Cornwall Police, Devon CCG and Devon district councils.	All partners, led by Devon County Council
2	STRENGTHEN THE ROLE OF HOUSING PROVIDERS IN PREVENTING AND TACKLING EXPLOITATION	
	(a) Devon Safeguarding Adults Partnership, Devon Children and Families Partnership and Devon's four Community Safety Partnerships to take a lead role in strengthening the role of housing providers in preventing and tackling exploitation, to ensure there is sufficient representation from the housing sector in the work of the respective boards and that the necessary structures are in place to allow information to be disseminated to all relevant providers and partners.	Devon Safeguarding Adults Partnership, Devon Children and Families Partnership and Devon's Community Safety Partnerships
	(b) All sheltered housing, supported living and care leaver accommodation providers to deliver face to face exploitation awareness training to all front-line staff, to educate residents on the risks of exploitation and to develop improved local links and appropriate information sharing arrangements with police and social care partners.	All sheltered housing, supported living and care leaver accommodation providers in Devon, with support from Devon Safeguarding Adults Partnership, Devon Children and Families Partnership and Safer Devon Partnership
	(c) All future commissioning of supported living, sheltered housing and care leaver provision to include a requirement in the service specification for potential providers to demonstrate an effective approach to preventing exploitation, including mandatory safeguarding and exploitation training for frontline staff.	Devon County Council and Devon district councils

3 EDUCATE AND EMPOWER COMMUNITIES TO BETTER RECOGNISE EXPLOITATION	
(a) Increased public campaigns, raising awareness of the prevalence of exploitation in our communities, educating the public around the signs of exploitation and what to do if they have concerns.	Safer Devon Partnership, Devon Safeguarding Adults Partnership and Devon Children and Families Partnership
(b) The Councillor Advocate Scheme to develop an enhanced focus on exploitation, equipping local councillors with the knowledge and information they need to become leaders and advocates on preventing exploitation in their communities.	The Office of the Police & Crime Commissioner and local Councillors

2. Background

2.1 Exploitation is a complex form of abuse in which someone is coerced into doing things for the benefit of others, which in may include criminal activity. The coercive nature of exploitation means that victims of exploitation often do not see themselves as victims.

2.2 Exploitation is a hidden crime which often happens out of sight, leaving victims at serious risk of harm and it is a major local and national issue. Within Devon, increasing numbers of vulnerable children and adults are being identified as victims of exploitation.

2.3 Anyone, regardless of gender, age or ethnicity can be affected by exploitation but we also know that there are a variety of factors such as social isolation, being in care or a care leaver, having a learning or physical disability or having caring responsibility which can make some people particularly vulnerable to exploitation¹.

2.4 There are many different forms of exploitation, which are often interlinked, meaning that more than one form of exploitation may be experienced by a person at the same time. The following forms of exploitation are major concerns in Devon.

2.5 **Sexual Exploitation** a form of sexual abuse where people are encouraged, manipulated or forced to participate in sexual acts. They may be threatened with violence and may be groomed by offers of affection, money or gifts. **Child Sexual Exploitation (CSE)** is sexual exploitation where the person being exploited is under 18. (For reference, a previous scrutiny review in Devon investigated the approach of the Police, the County Council and other partners' in keeping children safe from sexual exploitation; this was published in January 2015²).

2.6 **Dangerous Drugs Networks** are run by criminal gangs and exploit the people they sell drugs to and those they force or coerce into criminal activity. This includes local drug networks and also the transportation and supply of Class A drugs from big cities and towns to smaller towns and rural areas, known as **County Lines**. Drugs gangs exploit children and vulnerable adults to engage in County Lines activities such as selling drugs, moving drugs or money across the country and 'cuckooing' where drugs gangs set up operating bases from the homes of vulnerable adults.

¹ <https://www.preventingexploitationtoolkit.org.uk/home/what-is-exploitation/what-is-vulnerability/>

² <https://democracy.devon.gov.uk/ecSDDisplay.aspx?NAME=Child%20Sexual%20Exploitation%20Review&ID=263&RPID=2984309>

2.7 **Modern Slavery** is a form of exploitation where a person is owned or controlled by another person and can include enslavement, domestic servitude, forced and compulsory labour and human trafficking.

2.8 **Financial Exploitation** occurs when a person misuses or takes the assets of a vulnerable adult for their own personal benefit. This can happen as a result of fraud, scams, blackmail or through developing debts.

2.9 **Radicalisation** is the process through which a person comes to support or be involved in extremist ideologies. It can result in a person becoming drawn into terrorism and is in itself a form of harm.

2.10 **Scope of the review**

The Spotlight Review set out to:

- Explore Devon's partnership approach to preventing and tackling criminal and sexual exploitation, with a particular focus on Child Sexual Exploitation (CSE), County Lines and Modern Slavery;
- Review the success of this approach and make any necessary recommendations for change.

2.11 The Spotlight Review meeting was held on 8th November 2019. Members heard from a range of stakeholders and partner agencies through presentations, workshops and facilitated discussion.

3. Devon's Partnership Approach

3.1 No single authority or organisation is responsible for safeguarding children, young people and vulnerable adults from exploitation. Devon County Council, Devon & Cornwall Police, district councils, the NHS and a range of other partners are working together to prevent and tackle exploitation through the [Safer Devon Partnership](#), the [Devon Children and Families Partnership](#) and the [Devon Safeguarding Adults Partnership](#).

3.2 Between them, these three partnerships work to keep communities, children and adults safe across Devon. Some of their key strategies and activities are outlined below.

3.3 **Adolescent Safety Framework**

The Adolescent Safety Framework (ASF) was launched in December 2019 and has been developed in response to the increased recognition that children and young people can be vulnerable to abuse and exploitation from outside the family. Using a restorative and strength-based approach the ASF aims to respond more clearly and decisively to extra-familial harm and exploitation, through a number of key changes in practice. More information about the ASF can be found [here](#).

3.4 **Multi-agency working groups and partnerships**

The Devon and Torbay County Lines multi-agency group was initially established to provide strategic direction and focus, enabling an effective response to all threats, risk and harm related to County Lines. Partners included Devon's Community Safety Partnerships, the Police, Children's and Adult's safeguarding teams, NHS, substance misuse services, housing authorities, prisons, youth offending and Crime Stoppers. The working group increased intelligence sharing across partners and opportunities for joint partner input and activity, including joint safeguarding visits. This way of working has now been largely embedded across partners, with ongoing exploitation prevention work continuing through the Devon & Torbay Anti-Slavery Partnership and the Devon Children and Families Partnership Child Exploitation sub-group.

3.5 Preventing Exploitation Toolkit

The Preventing Exploitation Toolkit has been developed by the Safer Devon Partnership in collaboration with the Devon Children and Families Partnership and the Devon Safeguarding Adults Partnership. The toolkit is designed for anyone who, in their line of work, may come across people who are vulnerable to harm and exploitation. The toolkit provides information and guidance to help people to understand, identify and report signs of exploitation. The Preventing Exploitation Toolkit can be found [here](#).

4. Key messages from the Spotlight Review

4.1 The Spotlight Review brought together a range of stakeholders who were asked to share their experiences and understanding of exploitation in Devon (see paragraph 11 for full list of witnesses). The key messages from this feedback are shown over the page.

WHAT ARE THE CHALLENGES?

WHAT NEEDS TO CHANGE?



Public/community understanding of the risks and prevalence of exploitation is key to making Devon safer

Young people now have a good understanding of the risks of CSE but this isn't the case for County Lines and Dangerous Drugs Networks – education should focus on the wider issue of 'exploitation' not just CSE

Have been issues in the past with supported living providers not recognising the signs of exploitation

We need to ask, what is it that young people are missing from their lives, that makes them vulnerable to exploitation?

Communities, parents, social care and schools need more information about exactly where exploitation is happening

Non-professionals (family, neighbours, colleagues) need to be equipped to notice the signs of exploitation

We need to work better with housing providers, landlords and care agencies to ensure that they have a better understanding of exploitation risk and how to make safeguarding referrals

Loneliness and isolation are huge factors in young people and adults becoming victims of exploitation

Youth work plays a vital role in building resilience in young people – we need more access to good quality youth work in Devon, across towns and rural areas

People think County Lines is an urban issue – they don't think it is happening in their community

We need to make Devon resilient and a hostile environment for criminals who exploit vulnerable adults and young people

There may be risks for young people who are educated at home and miss out on PHSE at school

Great examples in South Devon of where extra support was put in place around youth gangs, but funding for this is not consistent across the county

We need to build young people up, support them to aspire and achieve, build self-esteem – we are so used to seeing negative images of young people

If communities are better informed and equipped, they can play a key role in recognising and reporting exploitation

For young people on the edges of exploitation and/or criminality, age 16 to mid-twenties is a crucial time – we need to improve support for young people at this time

5. Education and resilience building

5.1 One of the key themes emerging from the Spotlight Review is the importance of building resilience. We know that criminal gangs specifically target, groom and exploit children and young people who may be more vulnerable, such as children in care or those with learning disabilities. However, we also know that gangs are frequently changing the profile of the people they choose to target. It is essential that all children and young people in Devon, regardless of their background or experiences, have a full and proper understanding of what exploitation looks like, where and how to seek help and support, and the confidence, self-esteem and resilience to stay safe.

PSHE curriculums

5.2 The majority of children and young people in Devon receive PSHE (Personal, social, health and economic) education at school, the purpose of which is to develop the knowledge, skills and attributes pupils need to keep themselves healthy and safe, and prepared for life and work³. PSHE education is not currently statutory, but in February 2019 the Department for Education (DfE) published Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance⁴ which requires schools to provide PSHE education which covers relationships and sex education (in maintained schools, academies, free schools and independent schools) and health education (maintained schools, academies and free schools) by September 2020.

5.3 The new statutory guidance has a clear focus on building resilience in young people and equipping pupils with the knowledge and skills to be safe and healthy. The guidance requires that by the end of secondary school, pupils should know the concepts of, and law relating to sexual consent, sexual exploitation and grooming, and makes some reference to the importance of young people's understanding of the law around criminal exploitation, including gang involvement and county lines.

5.4 Although the majority of children attend school, 1.7% of school age children in Devon are home educated and as such the DfE guidance does not apply to the education they receive. The local authority has a role in supporting parents and carers who home educate through the provision of resources, advice and guidance which includes some signposting through the Babcock website, and face to face advice during home visits by Elective Home Education (EHE) Advisors. When a child is withdrawn from school, the EHE Team now specifically ask schools to provide them with any child exploitation concerns that they have, and in addition the team has created two new 'EHE Family Support Worker' posts who will provide Early Help support to families who home educate where the children have been identified as 'vulnerable'. The staff fulfilling these roles will receive full safeguarding training including how to recognise and respond to potential criminal exploitation.

5.5 Members of the Spotlight Review welcome the DfE's recognition of the importance of education around exploitation and resilience building through the publication of their statutory guidance. Members urge all schools in Devon to embed this guidance into their PSHE curriculum and in particular, to develop a key focus on educating children and young people about the risks and dangers of all forms of exploitation, how to form healthy relationships and help young people to build self-esteem and resilience.

³ <https://www.pshe-association.org.uk/curriculum-and-resources/curriculum>

⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/805781/Relationships_Education_Relationships_and_Sex_Education_RSE_and_Health_Education.pdf

Youth Work

5.6 The purpose of youth work is to support a young person's personal, social and educational development. The National Youth Agency (NYA) says that youth work 'offers young people safe spaces to explore their identity, experience decision-making, increase their confidence, develop inter-personal skills and think through the consequences of their actions. This leads to better informed choices, changes in activity and improved outcomes for young people⁵'.

5.7 Good quality, well-resourced and professionally delivered youth work can and should play a key role in building confidence and resilience in young people, educating them about the risks and dangers associated with exploitation, and equipping them with the personal qualities and skills they need to be safe from all forms of exploitation.

5.8 In a climate of dramatically reduced local government funding the County Council took the decision to reduce its youth service offer from 32 youth centres to 8 youth hubs across the County, retaining some open access services but with a renewed focus on targeted youth work. The delivery of youth services was outsourced to staff mutual DYS Space from February 2015⁶ which included an element of support for community groups wishing to provide youth services themselves. Although some communities have been able to re-establish their youth club, this is not consistent across the County, and the reduced service along with Devon's vast and rural nature leaves a large proportion of young people without access to high quality youth work, at a time when they are most in need.

5.9 Recognising the key preventative role that youth work can play in enabling young people to be build resilience and be safe from exploitation, Members of the Spotlight Review would like to see a partnership approach towards greater investment and development of youth services across Devon.

RECOMMENDATION 1 – BUILD GREATER RESILIENCE IN CHILDREN AND YOUNG PEOPLE

- (a) All primary, secondary and special schools in Devon (including maintained schools, academies, free schools and independent schools) to deliver a quality, age/ability appropriate PHSE curriculum, which has a key focus on the risks and dangers of all forms of exploitation, identifying and forming healthy relationships and building self-esteem and resilience.
- (b) A greater investment in both targeted and open access youth services across the County, to be jointly developed and funded by Devon County Council, Devon & Cornwall Police, Devon CCG and Devon district councils.

6. Sheltered housing and supported living

6.1 We know that many vulnerable adults and young people across Devon are affected by exploitation. Those with specific vulnerabilities such as being a care leaver, having poor physical or mental health, learning disabilities or substance misuse issues can be specifically targeted by criminal gangs, particularly in cases of County Lines and financial exploitation.

6.2 Concerns were expressed during the Spotlight Review that vulnerable adults living in sheltered housing and supported living accommodation were particularly vulnerable to exploitation, and that

⁵ <https://nya.org.uk/careers-youth-work/what-is-youth-work/>

⁶ *the service has recently been recommissioned and following a competitive tendering process the contract was re-awarded to DYS Space*

there had been cases in Devon where some housing managers and other staff did not have the awareness or understanding necessary to recognise risks or the signs of exploitation, or take the appropriate action in response. Where these cases have been identified, social care and police colleagues have worked with housing providers and the person at risk to raise awareness and understanding around exploitation risk and address any concerns.

6.3 We expect sheltered housing and supported living providers to consider safeguarding residents a top priority, but it appears that some may not be recognising the specific risks and indicators associated with exploitation or taking the right steps to prevent exploitation.

6.4 The housing landscape is complex, with the County Council, district councils, private housing associations and supported living providers all playing a part in commissioning and delivering housing and support in Devon. However it is vital that all partners recognise their distinct roles in preventing and tackling exploitation and that each organisation develops a culture where safeguarding adults and young people from exploitation is a key priority and where staff are adequately trained to recognise exploitation and take appropriate action in circumstances where people may be at risk.

6.5 This needs to be addressed by all in the housing and care industry, including sheltered housing and supported living providers through the adequate training of staff in exploitation awareness, and where appropriate, providing residents with advice and guidance on exploitation, so that they are also educated and empowered to protect themselves and look out for their neighbours. Of equal importance is the need for providers to create local links and information sharing with other agencies including the police and social care.

6.6 There is also a key role for the Devon Safeguarding Adults Partnership, the Children and Families Partnership and Devon's four Community Safety Partnerships in recognising this risk and taking a greater strategic role in addressing it. This will include ensuring that there is sufficient representation from all parts of the housing sector in these partnerships and on respective boards and relevant sub-groups, and that the necessary structures are in place for information to be disseminated to all relevant organisations.

6.7 There is also a significant role for both county and district commissioners when recommissioning sheltered housing, supported living and care leaver provision, to ensure that service specifications require potential providers to give significant assurances around exploitation.

RECOMMENDATION 2 – STRENGTHEN THE ROLE OF HOUSING PROVIDERS IN PREVENTING AND TACKLING EXPLOITATION

(a) Devon Safeguarding Adults Partnership, Devon Children and Families Partnership and Devon's four Community Safety Partnerships to take a lead role in strengthening the role of housing providers in preventing and tackling exploitation, to ensure there is sufficient representation from the housing sector in the work of the respective boards and that the necessary structures are in place to allow information to be disseminated to all relevant providers and partners.

(b) All sheltered housing, supported living and care leaver accommodation providers to deliver face to face exploitation awareness training to all front-line staff, to educate residents on the risks of exploitation and to develop improved local links and appropriate information sharing arrangements with police and social care partners.

(c) All future commissioning of supported living, sheltered housing and care leaver provision to include a requirement in the service specification for potential providers to demonstrate an effective approach to preventing exploitation, including mandatory safeguarding and exploitation training for frontline staff.

7. Informing and empowering communities

7.1 Keeping people safe from exploitation has become a significant area of work and focus for local authorities, the police, schools and partner organisations. We can see this through the ongoing development of joint strategies and partnerships operating at a strategic level, and increasingly in the practice of those working with vulnerable adults and children.

7.2 However, the importance of awareness raising and understanding amongst members of the public and communities was raised a number of times during the Spotlight Review. Public understanding around the prevalence and harm associated with the various forms of exploitation is still limited and many misconceptions still exist around exploitation. In rural areas, issues such as County Lines and modern slavery are often considered to be 'urban' issues by the public, but the reality is quite different, with County Lines operations reaching far into the countryside and examples of Modern Slavery being found in industries such as agriculture, fishing and care homes.

7.3 Any one of us may come into contact with exploitation through our daily lives, and it is important that all of us, as parents, neighbours, colleagues and consumers are able to identify the signs of exploitation and know what to do if we discover something we are concerned about. For this to happen we need to increase public awareness through focussed, multi-agency, public campaigns.

7.4 As local councillors we also have a unique role, not only through our casework where we come into contact with so many different people, but as community leaders, where we have the opportunity to play a key role in awareness raising around exploitation and getting the message out to the people we represent.

7.5 The Councillor Advocate Scheme created by Devon and Cornwall's Police and Crime Commissioner aims to 'ensure that councillors feel more equipped to inform the public about crime and policing, educate their communities about crime and support/encourage greater reporting of issues to the police and other appropriate partner organisations⁷'. A scheme such as this could be a great vehicle to equip councillors to raise awareness and disseminate information about the signs of exploitation within their communities. The Councillor Advocate Scheme has engaged a number of councillors from within Devon but continues to encourage more local councillors from all tiers of local government and all parts of the County to join the scheme, to ensure that as many councillors and communities benefit as possible.

RECOMMENDATION 3 – EDUCATE AND EMPOWER COMMUNITIES TO BETTER RECOGNISE EXPLOITATION

(a) Increased public campaigns, raising awareness of the prevalence of exploitation in our communities, educating the public around the signs of exploitation and what to do if they have concerns.

(b) The Councillor Advocate Scheme to develop an enhanced focus on exploitation, equipping local councillors with the knowledge and information they need to become leaders and advocates on preventing exploitation in their communities.

⁷ <https://www.devonandcornwall-pcc.gov.uk/take-part/councillor-advocate-scheme/#contact3839>

8. Conclusion

8.1 Members of the Spotlight Review commend Devon's partnership approach to preventing and tackling exploitation across the County and recognise the hard work and focus of all partners in working together to address what is a difficult and ever evolving task. We wholeheartedly acknowledge the complexity of the challenge facing police and local authority partners in Devon, as well as nationally, and know that developing solutions to this challenge is an equally complex undertaking.

8.2 As such, we have focussed this report and its recommendations on a few areas where we feel that education, awareness raising and resilience building amongst those who may be vulnerable to exploitation, frontline staff, and within communities as a whole, could make a real difference. We ask that the recommendations made in this report will be given serious consideration by all partners involved, and hope that the issues raised and key messages from this Spotlight Review will contribute towards the continuing work of Devon's partnerships in responding to exploitation, and ultimately towards creating safer communities across the County.

9. Membership

Councillors Alistair Dewhirst (Chair), Debo Sellis, Carol Whitton, Colin Slade, Su Aves, Yvonne Atkinson, Richard Hosking

10. Contact

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11. Sources of Evidence

Witnesses

The Spotlight Review heard testimony from a number of stakeholders and witnesses and would like to express sincere thanks to the following people for their contribution and the information shared.

Chief Constable Shaun Sawyer	Devon and Cornwall Police
Supt. Neil Ralph	Devon and Cornwall Police
Julie Richards	DCC – Safer Devon Partnership Manager
Lisa Vango	Strategy, Performance and Planning Manager, Office of the Police and Crime Commissioner
Detective Supt. Jason Metcalfe	Devon and Cornwall Police
Supt. Jez Capey	Devon and Cornwall Police
Inspector Rob Curtis	Devon and Cornwall Police
Inspector Simon Arliss	Devon and Cornwall Police
Stephen Farmer	Devon Association of Secondary Heads
Melanie Smallwood	Devon Association of Primary Heads
Dan Barton	DYS Space
Cheryl Skeggs	Wave Multi-Academy Trust
Councillor Roger Croad	Cabinet Member for Community, Public Health,

	Transportation and Environmental Services – Member of Police and Crime Panel
Councillor James McInnes	Cabinet Member for Children and Skills
Councillor Andrew Leadbetter	Cabinet Member for Adult Social Care and Health Services
Darryl Freeman	Head of Children’s Social Services (DCC)
Rachel Gillott	Locality Director South, Children’s Social Care (DCC)
Nicky Beaton	Practice Lead, Adult Safeguarding (DCC)
Beverley Dubash	Babcock LPD
Jill Lake	DCC Public Health Nursing

References

Devon and Cornwall Police and Crime Commissioner, Councillor Advocate Scheme

<https://www.devonandcornwall-pcc.gov.uk/take-part/councillor-advocate-scheme/#contact3839>

Devon Children and Families Partnership

<https://www.dcfp.org.uk/>

Devon County Council, People’s Scrutiny Committee, Child Sexual Exploitation Review, Safeguarding Children Task Group

<https://democracy.devon.gov.uk/ecSDDisplay.aspx?NAME=Child%20Sexual%20Exploitation%20Review&ID=263&RPID=2984309>

Devon Safeguarding Adults Partnership

<https://www.devonsafeguardingadultspartnership.org.uk/>

Devon Safeguarding Adults Annual Report 2018/18

<https://democracy.devon.gov.uk/documents/s27373/3.0%20Draft%20Devon%20Annual%20Report%20201819.pdf>

National Youth Agency

<https://nya.org.uk/careers-youth-work/what-is-youth-work/>

Preventing Exploitation Toolkit

<https://www.preventingexploitationtoolkit.org.uk/identifying-exploitation/>

PHSE Association

<https://www.pshe-association.org.uk/curriculum-and-resources/curriculum>

Relationships Education, Relationships and Sex Education (RSE) and Health Education: Statutory guidance for governing bodies, proprietors, head teachers, principals, senior leadership teams, teachers

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/805781/Relationships_Education_Relationships_and_Sex_Education_RSE_and_Health_Education.pdf

Safer Devon Partnership

<https://saferdevon.co.uk/>

Social Care Institute for Excellence: Safeguarding adults for housing staff

<https://www.scie.org.uk/safeguarding/adults/practice/housing>

Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children, July 2018

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf