

CHILD SEXUAL EXPLOITATION:



A GUIDE FOR BUSINESSES

FSB

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Our mission is to create the best environment for businesses to start up and thrive. Our success will drive the economy and create jobs.

We are member-led, so that we authoritatively protect and champion the interests of nearly 200,000 self-employed people and owners of small firms. We are strong in every industry sector of the economy, and in every nation and region – England, Scotland, Wales and Northern Ireland. Proud of our independence, we ensure the voice of small business is heard by decision-makers at every level of Government – from a local council right through to Brussels. We are a cross-party, non-partisan organisation, and so we work with councillors, MPs, MEPs, Peers and elected representatives from all major political parties and in all Parliaments and Assemblies. We campaign, but we also bring our entrepreneurial spirit into our work by proposing practical policy changes and being part of the solution.

More broadly, we support our members at every stage of their business journey. We provide them with market-leading business services from insurance and business banking through to legal and tax advice.

CHILD SEXUAL EXPLOITATION: KEEPING CHILDREN AND LOCAL BUSINESSES SAFE

This guidance is intended to support people operating unlicensed local businesses to which children and young people have access. It is to raise awareness of the risks of child sexual exploitation and how it can involve and impact on the safety of children and local business.

What is child sexual exploitation?

An extract from the government definition 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 local businesses?

In addition to having a serious impact on the welfare and safety of children, sexual exploitation is associated with crime and if it happens at, or is associated with, your business it may cause serious financial and reputational damage.

Local businesses are places where people routinely go for a number of reasons. They may go to shop there as customers, they may work or volunteer there, or they may be at a business to socialise and enjoy themselves. As such some businesses may 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 places to develop a relationship of trust and make them feel special by giving them ‘treats’ such as meals or alcohol, or by involving them in adult parties. A business 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) or small shops may attract groomers if the premise is frequented by children or young people.
- Where underage 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.

Signs of CSE

These may be warning signals. These don't mean CSE is taking place, but if you are concerned the situation should be closely monitored and any suspicions reported:

- Young person with older adults
- Drinks bought for the young person
- Dressed to appear older/excessive make up
- Overly sexualised language or behaviour
- Truanting from school
- Binge drinking
- Appear out of control
- Adults appear to have control over young person
- Works in various locations
- Has limited freedom of movement
- Appears malnourished
- Does not have money but has a mobile phone
- Withdrawn and appears afraid of authority figures

If you are concerned or suspicious of your customers' behaviour and routines, note descriptions of persons/clothing/vehicles and report to the police

An example of businesses that may be at risk:

- Hot food takeaways/off-licences/local shops
- Night clubs
- Adult venues (sauna, lap dancing)
- Children's party with adult entertainer
- Public events
- Beer gardens
- Restaurants
- Hotels
- Shopping precincts
- Young people's facilities; training, sport/leisure
- Toilets/car parks/isolated areas
- Employment of young people
- Any place where young people have access

What you can do to protect children and your business:

It may help 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.
- Staff training records should be maintained, including induction and refresher sessions. Records should be signed by the trainer and trainee and dated.
- 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.
- Staff should adhere to a Code of Conduct to promote good safeguarding practice.
- Employment records should be maintained for all of your staff including photographic identification, national insurance number, proof of permission to work in the UK, references.

Identifying risks in your workplace

The risk will vary depending on circumstances; consider:

- Do under 18's have access to your workplace?
- Which part of the workplace do they have access to?
- What is the reason under 18's have access?
- Are they there as legitimate customers?
- Are they employed there?
- Are they entertaining or performing at an event?
- Are they there for other reasons such as meeting someone who is exploiting them?
- Are they being brought there under any suspicious circumstances? (For example; cars regularly turning up with young people or meeting young people. They may have legitimate access to certain parts of the workplace at certain times or
- They may be in areas illegitimately (for example to use drugs, consume alcohol or meet people who are putting them at risk.)

Consider:

Is the child at risk of being subjected to grooming or exploitation?

Is the child at risk of being harmed?

Is the child in a situation where an adult could abuse a position of trust?

Which adult could abuse a position of trust?

Anyone accessing the premises or who is associated with the business physically, or by using equipment such as company car, mobile company phone, laptop, computers. This may include employees, volunteers, customers.

Consider the layout of the workplace

E.g. places that are out of view, private areas or booths, secluded areas or car park.

How to manage risks

- Age verification/ID checks
- Keep incident logs and handover notes
- Monitor areas including use the of CCTV or regular patrols
- Staff code of conduct
- Report suspicious activity

Code of Good Safeguarding Conduct

When Working with Children and Young People

This guidance aims to promote good safeguarding practice for staff working with children and young people who may be customers, employees or volunteers in small/independent businesses. It is recommended that the following safeguarding principles should be embedded into staff training and their day to day practice:

Staff safeguarding principles:

- It is important to register in and out of shifts. A shift register should be maintained.
- You should wear photo ID when on duty.
- You should remain professional at all times and should not:
 - Touch a child or young person inappropriately
 - Make offensive or inappropriate comments (such as the use of swearing or sexualised or discriminatory language)
 - Behave in a way that may make a child or young person feel intimidated or threatened
 - Attempt to obtain or misuse the personal details of a child or young person via the business, or via contact with the child during business
 - Attempt to develop inappropriate relationships with a child or young person via the business
- You should complete a written note or record when an incident occurs involving a child or young person including any actions taken or refusals of service.
- If you are concerned about the safety, welfare or behaviour of a child or young person, you should report this to the police or other relevant service and to the business manager. As with all professions if you are concerned about someone's conduct report your concerns to your manager or the relevant agency.

Guidance for Operators of Small Businesses

This guidance aims to promote good safeguarding practice in local businesses in order to keep vulnerable children – and local trade – safe from the risks associated with child sexual exploitation. It is recommended that the business manager implements the following principles in training and operational practice:

- A children's risk assessment should be undertaken and recorded in writing. This should inform your operating policy and staff training, so that staff are aware of what child sexual exploitation is and how it can affect businesses and to ensure staff understand how to report concerns.
- All staff should be trained and staff training records should be maintained. Records should be signed by the trainer and trainee and dated.
- Employment records should be maintained for all staff and volunteers (including persons under the age of 18 years), including name, address, date of birth, national insurance number/documentation giving permission to work in the UK, contact telephone number and vehicle registration numbers (where relevant); proof of identity.
- References should be obtained and authenticated for staff and retained as part of your staff records.
- Staff should be required to sign in and out at each shift and these registers should be maintained as part of your due diligence records.
- Staff should be required to adhere to a Code of Good Safeguarding Conduct to promote safe practice in relation to vulnerable customers.
- Staff should wear photo-identification so that s/he is identifiable at all times.
- Staff should remain professional at all times and should not:
 - Touch a child/young person unnecessarily or inappropriately.
 - 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 exchanging personal information or 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 a booking, or obtained by any other aspect of the business).
- Records should be maintained of complaints and any disciplinary action taken against staff 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 policy should be in place regarding safe and appropriate use of information technology, internet access and use of social media sites.
- Staff should be aware of how to report concerns about the safety, welfare or behaviour of a vulnerable or suspicious person, s/he should be encouraged to report this to the police (if it is an emergency dial 999) or other appropriate service and to their manager. The nature of the concern and actions taken should be recorded in the incident log.

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<http://www.fsb.org.uk/uploads/child%20sexual%20exploitation.pdf>

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