

# Greater Manchester Complex Safeguarding Strategy

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2024 – 2027



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## Foreword

In partnership with Greater Manchester Combined Authority, we as representatives of the statutory safeguarding partners (Greater Manchester local authorities, Police, and Health) are pleased to present the *Greater Manchester Complex Safeguarding Strategy for 2024-2027*.

This strategy builds on the work already in place across Greater Manchester, and the numerous accomplishments of our multiagency partnership since the launch and implementation of the Complex Safeguarding Delivery plan for Greater Manchester in 2019. Over the last five years, a range of successes have enabled Greater Manchester to continue to develop and strengthen our exploitation-related best practice. To name but a few of these successes:

- The creation of dedicated multiagency exploitation teams across the ten local authorities, providing our communities with coordinated, trauma-informed, evidence and relationship-based services.
- The delivery of high-profile Weeks of Action events, bringing partners together twice a year around safeguarding, prevention, workforce development, and multiagency disruption.
- The implementation of a robust performance framework to better understand our measures of success.
- The successful rolling out of a new strengths-based approach to assessing risk and harm, which is now being emulated by local authorities and organisations across England.

Tackling the terrible harms of child exploitation is an ongoing process that evolves in line with the very nature of exploitation, and as such this continues to be a key priority under Greater Manchester's Children & Young People's Plan. We believe it is incumbent upon us to continue to safeguard children, young people and their families across the city-region, and we recognise that much remains to be done.

This strategy outlines and reinforces our collective commitment and the next steps we will take as a partnership to continue to tackle the harm caused through child exploitation.

We recognise that tackling this crime in all of its forms requires everyone to play their part. Key to the strategy is the emphasis on the importance of a strong multiagency partnership to continue to develop and learn, and effectively address the complex, ever-changing nature of exploitation.

This strategy has been developed through extensive consultation bringing together professionals across a range of key organisations, and our partnership testifies to our dedication towards working hand-in-hand.

We know that exploitation can have serious, life-long consequences on every single aspect of a child or young person's life and that of their families. In difficult economic times that have compounded health and social inequalities, local communities need support to increase their resilience against perpetrators. Beyond the harms caused to individuals, we also recognise the wider societal costs. This means we continue to recognise the importance of reaching children and young people as early as possible to avoid the escalation of harm, the unnecessary criminalisation of young victims, and to reduce long-term pressure placed on public services.

Our priorities going forward will be to continue to lead in terms of understanding and responding to exploitation trends by implementing the national set of evidence-based practice principles for tackling exploitation, promoting innovative leadership to tackle structural and procedural barriers around transitional safeguarding, and furthering cross-border working across Greater Manchester and other areas.

As part of our shared responsibility, we will take collective action to seek assurance that this strategy delivers on its objectives to offer bespoke support to the victims and survivors of exploitation whilst disrupting perpetrators at the earliest possible stage. Most importantly, we will place the voices and wellbeing of children, young people and families across the city-region at the heart of what we do to ensure we deliver services tailored to their needs.

The direction we collectively set out to keep all children, young people, families and their local communities safe lies at the heart of this strategy. By endorsing and committing to it, we believe that we can change the future for our children and young people, supporting them to live the happy and healthy lives that they deserve.

Representatives of GM Statutory Safeguarding Partners

Greater Manchester Directors of Children's Services

NHS Greater Manchester Integrated Care Board

Greater Manchester Police

## Introduction

This Greater Manchester Complex Safeguarding strategy has been developed in consultation with Local Authorities, Police, Health, and an extensive range of specialist partners working together to safeguard children, young people, and their loved ones.

Building on the previous Complex Safeguarding Delivery Plan for Greater Manchester (2019-2021), this strategy sets out the Greater Manchester strategic framework, priorities, and multiagency commitments to tackle child exploitation and extra-familial harm, aiming to further our joint response in protecting children and young people who are experiencing or may be at risk of exploitation.

Throughout this strategy, the term “Complex Safeguarding” is used to refer to all types of child exploitation and extra-familial harm.



The term **Complex Safeguarding** has been defined as: *“A criminal activity (often organised) or behaviour associated with criminality, involving children or adults (often vulnerable) where there is exploitation and/or a clear or implied safeguarding concern.”*

Here, “complex” does not constitute a comment on the lives of the children and young people who are at risk of, or currently being exploited. Instead, it was coined to articulate the view that child protection systems and practices in their existing forms do not adequately meet the needs of those facing such risks, and that creating new ways of working together is essential.

All statutory and voluntary organisations that were consulted for the writing of this strategy are committed to tackling all forms of exploitation across Greater Manchester, working collectively as set out throughout this paper.

## Scope

### Children, Young People and Young Adults

This strategy focuses on safeguarding children and young people against exploitation and extra-familial harm.

At the heart of Greater Manchester’s approach lies the evidence-based recognition that children and young people up until the age of 25 have distinct safeguarding needs, where contextual factors are compounded by biological changes that impact on emotional regulation, social relationships, mental capacity, and executive functioning.<sup>1</sup>

In the light of Transitional and Contextual Safeguarding models acknowledged as best practice across the Greater Manchester area, it is recognised that existing systems and commissioning arrangements revolve around a counterproductive binary between the terms of “childhood” and “adulthood”, marked by a person’s 18<sup>th</sup> birthday.

Recognising the benefits of aspiring towards an all-age approach and robust early help offer for young adults, this strategy lays the first stone towards this step by acknowledging research outcomes. In this strategy paper, the term ‘*young people*’ encapsulates notions of adolescence and early adulthood by describing individuals up until the age of 25.<sup>2</sup>

These concepts are further developed in the Transitional Safeguarding section below.

## **Context of Harm**

This strategy’s focus on extra-familial harm should not overshadow the importance of noting the impact of all forms of harm and the ways in which they intersect with risk in exploitation. Greater Manchester Complex Safeguarding understands that children and young people may have had adverse experiences in childhood, be affected by inter-generational trauma, or have familial links to exploitation. Recognising the pitfalls of dualistic views separating “intra” and “extra” familial harm is key to avoid missing opportunities to protect children and young people.

## **Key Definitions**

The concept of “Complex Safeguarding” encapsulates the multifaceted and ever-changing nature of exploitation and extra-familial harm, and the multitude of domains that they cross.

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<sup>1</sup> See further research on the concept of adolescence in *Appendix 2*.

<sup>2</sup> This age range is reflected in other areas of statutory support. Children and adults who are care experienced can expect advice and guidance from the responsible local authority up until the age of 25 (Children Act, 1989, Children Leaving Care Act 2000, Children and Social Work Act 2017). Equally, young people with Special Educational Needs can receive support from the local authority under an EHCP up until 25 if required. Young people can apply for an EHCP up until 25 even if they did not have one as a child.

For the purpose of this strategy, this umbrella term includes, but is not limited to, the forms of exploitation defined below:

- **Child Sexual Exploitation** – occurs when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or adolescent into sexual activity, in exchange<sup>3</sup> for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. It does not always involve physical contact and can also occur through the use of technology (as defined by the [Home Office](#)).
- **Child Criminal Exploitation** – occurs when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or adolescent into any criminal activity. It does not always involve physical contact and can also occur through the use of technology (as defined in the [Serious Youth Violence](#) strategy).
- **County Lines** – a violent and exploitative form of drug distribution. A common feature of county lines is the exploitation of children, adolescents and adults who are instructed to deliver and/or store drugs, and associated money or weapons, to dealers or drug users, locally or in other counties (as defined by the [Home Office](#)).
- **Modern Slavery and Human Trafficking** – Modern slavery relates to the exploitation of children and adults in slavery, servitude, or forced or compulsory labour. Human trafficking is the recruitment, movement, harbouring or receiving of children and adults through force, coercion, or deception for the purposes of exploitation (as defined by the [National Crime Agency](#)).
- **Debt bondage** – a form of entrapment when a victim owes money to their exploiters and is made to repay their debt, either financially or through another means such as transporting drugs (as defined by the [Home Office](#)).
- **Serious Organised Crime** – criminals planning, coordinating, and committing serious offences, whether individually, in groups and/or as part of transnational networks (as defined by the [Home Office](#)). The serious organised crime priorities for Greater

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<sup>3</sup> It is worth noting here that the notion of *exchange* in the context of Child Sexual Exploitation has been challenged nationwide, both by survivors and by organisations such as Barnardo's, NWG or Research in Practice because it reframes abuse in terms of reciprocity, suggesting victims are complicit of their own abuse to some degree. See for instance "[Language Matters](#)" by Barnardo's, p.11 (2022).

Manchester listed out in [Programme Challenger's strategy](#) are: • Tackling county lines activity • Tracking financial activity and linked offences • Understanding poly-criminality and disrupting markets.

- **Cuckooing** – in some cases, criminals involved in County Lines will take over a local property, normally belonging to a vulnerable person, and use it to operate their criminal activity from. This is known as cuckooing (as defined by the [National Crime Agency](#)).<sup>4</sup>

## Vision, Principles and Priorities

### Vision

Our vision is for *all children and young people to be protected from child exploitation and extra-familial harm, and live safe, happy, and fulfilling lives.*

It is our belief that tackling child exploitation is everybody's business, and that drawing on families, communities, and other networks to ensure the safety of children and young people is paramount. As such, we also envision for this strategy to be a call for action, and we will continue to work to foster early identification, information-sharing, and resilience within wider communities.

Whilst recognising the role of law enforcement and disrupting the activity of those perpetrating harm, we will continue to advocate for the decriminalisation of children and raise awareness of the victim/perpetrator duality that is so often evident in exploitation.

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<sup>4</sup> For the purpose of this strategy, Prof Rosemary Broad, Head of Department for Criminology at the University of Manchester added: *"Whilst this is a useful definition, it is important that using it does not narrow policymakers' and practitioners' views of the variety of activities through which people can be victimised in the context of what might be usefully approached as cuckooing. This is particularly the case for crimes that are not drug-related - although this can make up the majority of cuckooing-related activity, there are a range of other ways in which premises might be used. Keeping an open mind to responding to potential home-based exploitation is important in recognising and responding to victims. Similarly, vulnerabilities can be much wider than those included here, and it may be that both victims do not want to identify as vulnerable or that front line work do not readily identify the vulnerability. This is particularly the case with neurodiversity, which can be unidentified or misinterpreted, leading to a disproportionate number of neurodiverse people being either not recognised as victims or criminalised. Individuals may also be targeted due to their isolation, having a lack of family and friends to support them and so their relationships with the person exploiting them may appear consensual. Finally, it may be useful for practitioners and policymakers to consider alternatives to the term 'cuckooing' such as home-based exploitation since the term exploitation can be difficult for victims to understand and the vast majority of practitioners in research undertaken in Greater Manchester in 2022 indicated that it does not represent the gravity and seriousness of the exploitation."*

Our vision, beyond being preventative and proactive, is also aspirational, and we will prioritise an approach that seeks to improve the wellbeing and happiness of children and young people, capitalising on their strengths and talents to foster thriving, happy communities.

## Principles of Practice

Greater Manchester’s vision for Complex Safeguarding 2024-2027 is directly shaped by eight evidence-informed principles, drawing from nationwide research.

In 2022, Research in Practice, the University of Bedfordshire and The Children’s Society co-devised a set of practice principles that drew on research, practitioners’ best practice, and the expertise of those with lived experience.

Greater Manchester played a key part in the consultation process that informed the design of this framework. As such, the principles<sup>5</sup> below are the product of years of best practice and learnings from peer reviews across all ten areas:

### *Principle 1 - Putting children and young people first.*

Key aspects of being child-centred include: • tailoring to each individual child or young person and the context of their lives; • keeping the child in focus when making decisions about their lives; • working in partnership with them and families; • prioritising their best interests and recognising their needs, rights, strengths, and potential; • ensuring that work is developmentally informed and cognisant of structural barriers and legal responsibilities.

### *Principle 2 - Recognising and challenging inequalities, exclusion, and discrimination.*

Key aspects of this principle include: • attending to both the interpersonal discrimination and inequalities facing children and young people, as well as their families/communities; • creating an inclusive culture for professionals and those they support, in which everyone is respected regardless of any characteristics; • making sure marginalised voices are heard.

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<sup>5</sup> Further details around these eight principles for tackling child exploitation, and related research, can be found on the website of the [Tackling Child Exploitation support programme](#).

***Principle 3 - Respecting the voice, experience, and expertise of children and young people.***

Key aspects of this principle include: • “working with” children and young people rather than “doing to them”; • involving them in decision-making at all levels and having transparent conversations about decision-making; • looking at participatory practices as a way to invert the manipulation and the coercion associated with exploitation; • paying particular attention to children and young people whose voices are sometimes overlooked.

***Principle 4 - Being strengths-based and relationship-based.***

Key aspects of this principle include: • seeing a child or young person holistically, identifying their strengths and assets and the positive factors in their lives rather than overfocusing on risk and harm; • using the positive power of relationships to support growth and change; • modelling strengths-based and relationship-based approach in multiagency settings.

***Principle 5 - Recognising and responding to trauma.***

Key aspects of being trauma-informed include: • understanding collectively how trauma impacts on development and behaviour (including “non-engagement” and “negative” coping strategies); • recognising how individual/organisational decisions, language and processes may compound traumatic experiences and affect the ability to develop trusting relationships; • enabling children and young people to exercise voice, choice, and control.

***Principle 6 - Being curious, evidence-informed, and knowledgeable.***

Key aspects of this principle include: • committing to reflection, learning, and thoughtful use of evidence at all levels; • considering multiple sources of information and intelligence to build an accurate picture of child exploitation and of a child’s life; • actively challenging assumptions and considering what is not known; • inviting expertise from others and being open to creativity/innovation.

***Principle 7 - Approaching parents and carers as partners, wherever possible.***

Key aspects of this principle include: • recognising the expertise of parents and carers to enhance agencies’ abilities to support children and young people; • modelling a mindset that sees parents and carers first and foremost as sources of protection, support and love unless there is evidence to indicate otherwise; • respecting their contributions and being sensitive to the distress they are likely experiencing.

**Principle 8 - Creating safer spaces and places for children and young people.**

Key aspects of this principle include: • paying attention to the context of children and young people’s lives, the potential for harms and the actions that can be taken; • moving beyond individualised interventions to consider wider patterns of harm and risk; moving beyond the physical safety of the child to also support their relational and psychological sense of safety.

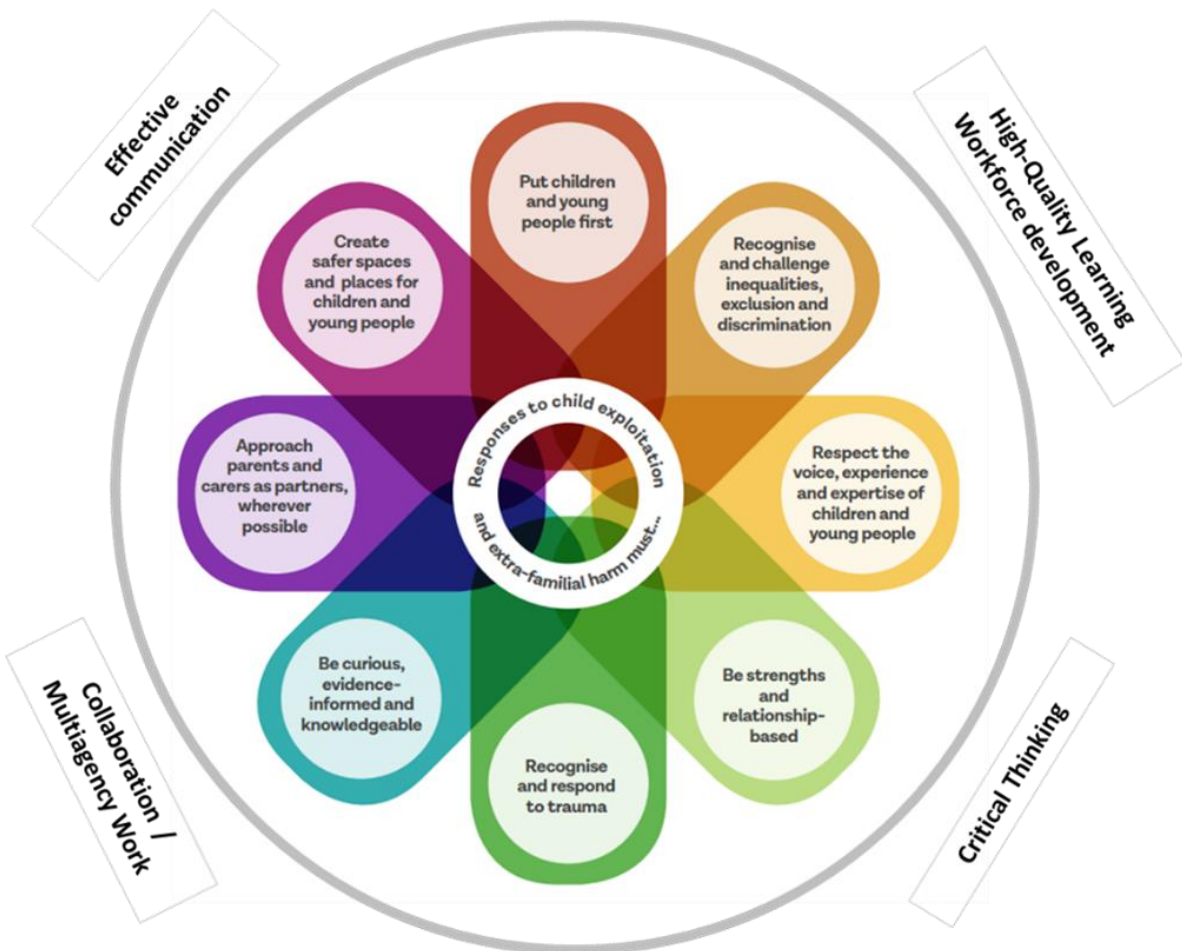


Figure 1. Greater Manchester Complex Safeguarding Principles

In line with its ongoing commitment to align with and further best practice nationwide, members of the Greater Manchester Complex Safeguarding Steering Group voted to adopt the Practice Principles for Responding to Child Exploitation and Extra-Familial Harm, the implementation of which will be coordinated over the next three years as detailed below.

## Priorities for 2024-2027

Whilst maintaining business as usual, the Greater Manchester Complex Safeguarding Hub will focus on four priorities, identified as areas for development in peer reviews and national best practice:

### Priority 1 – Implementation of the Principles.

Implementing the eight practice principles across all ten areas has been agreed as Greater Manchester's top priority for Complex Safeguarding. This will be supported by the central Hub through local consultation, workforce development and learning events, as well as bespoke support around using the [Practice Principles Partnership Reflective Tool](#) as a self-assessment resource to reflect on local implementation of the principles and consider how they are embedded within multiagency responses.

**Success measure:** Full implementation of the Practice Principles by 2027 across all ten local areas with the support of Greater Manchester Complex Safeguarding Hub.

### Priority 2 – Transitional Safeguarding.

The Hub will coordinate a GM-wide community of practice around transitional safeguarding to support local authorities with furthering strategic and operational shifts towards more seamless and consistent pathways for young people up to 25, wherever concerns around exploitation have been raised.

**Success measure:** Local Authorities will be aware of promising practices across Greater Manchester and nationwide, and thus be empowered to start considering how to modulate their transitional safeguarding approach at a local level.

### Priority 3 – Cross-Border Working.

Exploitation does not stop at geographical boundaries: in fact, the movement of children and young people between regions is an integral part of exploitation through County Lines. The Hub recognises the challenges that cross-border information-sharing constitutes and will prioritise supporting partners to coordinate a more seamless response to exploitation.

**Success measure:** Geographical boundaries will no longer constitute additional barriers to supporting children and young people in the context of exploitation. All relevant agencies

will be reaching across both professional and geographical boundaries to create stronger partnerships and better coordinated information-sharing to manage risk and harm.

**Priority 4** – Emerging Threats and Harms.

The GM Complex Safeguarding Hub will prioritise working with local, regional, and national organisations to gather intelligence around emerging threats, so as to remain in the best possible position to respond to the ever evolving and multifaceted nature of exploitation. Greater Manchester recognises the importance of an informed workforce to address new concerns efficiently. One example will be to upskill practitioners around understanding the impact of Online Harm in the context of exploitation, and the legislative changes that are being discussed at a national level.

**Success measure:** Greater Manchester will remain at the forefront of best practice around tackling the exploitation of children and young people nationwide, operating with a skilled workforce able to respond to new threats.

The implementation of these priorities will span across all four pillars of delivery:

- 1. Prevention and early intervention:** Greater Manchester will continue to work with the voluntary sector and statutory organisations to protect children and young people from the harms of exploitation. This will include the coordination of continuous learning opportunities (through CPD events and Weeks of Action activities) with a view to skill up Complex Safeguarding teams and relevant multiagency practitioners. Beyond professional networks, Greater Manchester will continue to work in close collaboration with families and local communities to increase resilience, information-sharing, trust in services, and early identification of risk.
- 2. Intervention and protection:** Greater Manchester will support local areas to improve integrated support and intervention pathways by encouraging innovative, evidence-based, person-led, and trauma-informed responses to those who are being exploited or at risk of being exploited. This will include modelling systems leadership to promote change in the area of Transitional Safeguarding.
- 3. Disruption:** Greater Manchester will continue to improve the multi-agency disruption response<sup>6</sup> to exploitation, using a contextual safeguarding model and cross-border

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<sup>6</sup> For further information regarding disruption, please refer to the government's child exploitation disruption toolkit, with which this strategy aligns: [Child exploitation disruption toolkit \(accessible\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/toolkits/child-exploitation-disruption-toolkit)

approach in order to stop perpetrators from being able to exploit children and young people for personal gain. Working with Community Safety Partnerships is key to this contextual model and will continue to inform our response.

- 4. Recovery:** Building on long-term investment in the Trusted Relationship programme, Greater Manchester will continue to support children, young people, and families with rebuilding their lives, repairing broken relationships, and finding life purpose through positive activities. We will continue to promote interventions that are consistent, trauma-informed, and relational, where time and resources do not constitute obstacles to children and young people healing from the harms of exploitation.

## Our Approach

### Structure

#### *Local Complex Safeguarding Teams*

All ten local authorities across Greater Manchester have an integrated partnership team, or “Complex Safeguarding team”, incorporating Local Authority, Health, and Police professionals as a minimum to inform their responses to child exploitation and extra-familial harm. Complex Safeguarding provides an intensive, trauma-informed, and strengths-based support service to children and young people experiencing exploitation or at risk of being exploited. To ensure success, interventions capitalise on trusted relationships, allow for professional creativity and autonomy, and are not limited in time.

All teams include a Trusted Relationship clinician, who aims to add to the expertise and skills of staff by bringing a psychological perspective to the work.<sup>7</sup>

The intersection between Complex Safeguarding teams and Missing from Home services is recognised and reflected locally in working arrangements such as co-location or information-sharing arrangements. Bespoke functions such as Independent Return Interviews provide key opportunities to identify risk and appropriate support.

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<sup>7</sup> See [Greater Manchester Resilience Hub: Pennine Care NHS Foundation Trust](#) for more information on Greater Manchester’s trauma-informed approach to Complex Safeguarding.

Complex safeguarding teams also deliver, co-ordinate, and/or signpost to specialist parent and carer support in their local areas.

Each team has created and nurtured partnerships with relevant statutory and voluntary sector organisations, as informed by local priorities and service provision.

### *GM Complex Safeguarding Hub*

Guiding and assisting the ten local teams, the Greater Manchester Complex Safeguarding Hub supports the implementation of the strategy by providing shared principles of practice to be applied across all Greater Manchester local authorities.

The Hub fosters a consistent approach to strategy, policy, and procedure by supporting the local teams with:

- Workforce development, providing bespoke training in line with identified needs, via promoting our Weeks of Action and other continuous professional development events.
- Quality assurance through the peer review process.
- Scoping of local/national best practice and evidence to increase performance.
- Coordination, governance, performance insights and impact framework.
- Data collection and analysis, building a picture of needs, trends, and capabilities.
- Research, learning and innovation, aspiring to create a centre of excellence locally.

## **Partnership Working**

Greater Manchester adopts a multiagency approach to tackling the multifaceted and ever-changing nature of exploitation. Co-designing solutions with a wide range of partners such as social services, police, health, education, community safety and the voluntary sector is central to effectively prevent, address, and help victims recover from exploitation-related harm.

This partnership model is embedded within all aspects of the Greater Manchester Complex Safeguarding Hub's activities. National organisations such as Barnardo's and The Children's Society are key partners in strategic and operational governance. The Complex Safeguarding Steering Group and Exploitation Operational Group bring together a coalition of agencies to create innovative collaborations, strengthen information-sharing and allow for the identification of key themes, emerging threats, challenges, and best practices, at policy and frontline levels.

To foster the sharing of learning, the Greater Manchester Complex Safeguarding Hub will continue to work hand-in-hand with key partners to design and deliver bespoke professional development offers across the region. The Week of Action events and large-scale conferences

offered to multiagency professionals capitalise on long-established and new partnerships to capture the expertise of diverse sectors (including social care, health, police, education) and organisations such as St Giles, Catch22, NWROCU, The National Autistic Society, Early Break, Afruca, Oasis UK, 84Youth, Listen Up, Lads Like Us and The Reign Collective. Working with the voluntary sector has placed the voices of victims at the forefront of our impactful and practical training delivery offer, substantiated with current case studies and/or directly led by people with lived experience.

At local level, multiagency teams have also established professional partnerships through their multi-agency safeguarding arrangements, thus working closely with local organisations with strong ties to the community, such as the voluntary sector and Education providers.

Greater Manchester will continue to approach parents, carers and communities as valuable partners in safeguarding children and young people from exploitation. Creating opportunities for parents' and carers' expertise to drive strategic activity, governance arrangements, service delivery, professional development and service review will remain at the core of our practice.

## **Adolescent Approach**

Under the Children and Young People's Plan for Greater Manchester, a key priority is to develop an approach and package of interventions that is more responsive to the adolescent age range. An [Adolescent Safeguarding Framework](#) was commissioned by the GMCA to share information across Greater Manchester about how best to support adolescents, particularly those at risk of, or experiencing extra-familial harm. The GM Complex Safeguarding Hub will continue to promote implementation of this framework to respond more effectively to risks across all systems.

The framework's principles incorporate elements of place-based, contextual, and transitional approaches that are paramount to offering the support that adolescents need. For this reason, our approach is to operate at the intersection of three key areas: Complex Safeguarding, Contextual Safeguarding and Transitional Safeguarding.<sup>8</sup> This is further articulated below.

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<sup>8</sup> On the intersection of Complex Safeguarding, Contextual Safeguarding and Transitional Safeguarding, see the article: Firmin C., Horan J., Holmes D., Hopper G. [Safeguarding during Adolescence: the Relationship between Contextual Safeguarding, Complex Safeguarding and Transitional Safeguarding](#), 2019.

### *Contextual Safeguarding*

Contextual Safeguarding is a term coined by Professor Carlene Firmin and her team at the University of Bedfordshire. It promotes a safeguarding approach that engages with the “extra-familial dynamics of risk in adolescence” as further detailed below:



“When operationalised a Contextual Safeguarding framework allows an area to do two things which feed into one another:

- 1) Recognise contextual risks during child and family work: record contextual issues related to referrals for children and families; collect information about extra-familial risks during child and family assessments, and; where extra-familial concerns are identified refer these in {...}.
- 2) Address contextual risk: accept referrals for peer groups, schools and public spaces; screen these referrals against contextual thresholds; subject them to assessment {...}; discuss this assessment at a multi-agency safeguarding meeting, and; action a plan to reduce the risk in these contexts.”

(Firmin et al, 2019)

This approach recognises that as children and adolescents develop, they are influenced by different environmental parameters that sit outside of the family sphere, such as school, local communities, peer groups, and online platforms.

In light of the recently published Independent Inquiry into Child Sexual Abuse (IICSA) report (2022), Greater Manchester acknowledges that online-facilitated child sexual exploitation remains an area of developing understanding, and an issue that has continued to escalate year on year, with a sharp increase during the Covid pandemic. This is covered by Priority 4 outlined above.

### *Transitional Safeguarding*

Transitional Safeguarding complements and builds upon Contextual Safeguarding (Firmin et al, 2019 recognising that the divergent thresholds, legislation, and practice approaches for

those aged under / over 18 means that too many older adolescents and young adults are not effectively safeguarded. Put simply, Transitional Safeguarding recognises that harm, trauma, and development do not stop at 18. In line with research on Transitional Safeguarding, Greater Manchester recognises that conceptual, procedural, and structural differences between adults' and children's safeguarding systems create considerable obstacles for young people turning 18 to obtain continued support. Transitional Safeguarding is defined as *“safeguarding adolescents and young adults fluidly across developmental stages which builds on the best available evidence, learns from both children's and adult safeguarding practice and which prepares young people for their adult lives”* (Holmes & Smale, 2018).

Transitional Safeguarding is not a set of defined activities, an intervention or a service seeking to “dictate practice through the use of prescribed tools”. It does not solely constitute a form of “transition” or “service transfer”, but a concept for *whole-system change*, underpinned by six key principles around which the concept can be adapted to meet local context. The current binary approach to safeguarding bears significant human and economic costs; too often services are forced to stop working with a young person as they turn 18, when their exploiters are able to ‘stick around’. This is a clarion call for change. It is only through bold action that the response to exploitation and extra-familial harm can be effective and brought in line with evidence gleaned over the past decade or so.



“Greater Manchester has always been ambitious and innovative, notably in its Complex Safeguarding approach. With devolution enabling even stronger local leadership and GM activity being deliberately boundary-spanning by design, it makes perfect sense that the concept of Transitional Safeguarding is gaining traction. We know that exploitation devastates lives with no regard for a person's birthday – we must reform our system response accordingly. It is exciting to see GM rise to this challenge – if GM can't do it, who can?”

(Dez Holmes, Director of Research in Practice)

Greater Manchester will prioritise collective, place-based problem solving, systems leadership and innovation, with the ambition to become a centre of nationwide excellence in the area of Transitional Safeguarding.

## Being trauma-informed

Greater Manchester recognises that a robust multiagency response to child exploitation and extra-familial harm requires a collective understanding of the impact of trauma on children, young people, families, and the practitioners who support them.

*“Ultimately, at the heart of any change, is the premise that individuals will be supported to thrive, and that no element of the service, practice, or professional relationships, will cause further harm by re-traumatisation”,* Dr Kate Friedmann, Clinical Lead Trusted Relationships Project, Greater Manchester Complex Safeguarding

In line with national recommendations from the Tackling Child Exploitation (TCE) programme, Greater Manchester will continue to consider trauma on three different levels:

- The direct trauma impacting children, young people, and families.
- The cultural and systemic trauma that may impact individuals and wider communities, stemming from shared experiences, such as serious violence.
- The vicarious or secondary trauma that can impact professionals supporting them.

More than an intervention, trauma-informed practices will be a core principle weaving its way through all levels of service design, delivery, and review.

## Understanding mental capacity

Greater Manchester recognises the challenges that emerge from the interfaces<sup>9</sup> between the different legislative frameworks shaping our understanding of safeguarding both children and adolescents – namely, amongst others, the *Children Act 1989*, the *Care Act 2014* and the *Mental Capacity Act 2005*.

Greater Manchester promotes supporting all children and young people who face the risks and harms of exploitation. Multiagency professionals work jointly to keep them safe and take prompt action when safeguarding concerns are identified. The nature of the support offered to young people (16+) is in line with the principles outlined in the Mental Capacity Act 2005:

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<sup>9</sup> See Appendix 2.

- A young person is always assumed to have capacity unless proven otherwise.
- Their right to make unwise decisions is acknowledged, their freedom valued.
- Interventions in the life of a young person who lacks capacity are made in their best interests, and in the least restrictive way possible.

Children and young people are involved in making decisions that concern their welfare; their wishes, views, and aspirations are sought out and respected, and information is given to them in a way that they can integrate.

Greater Manchester is committed to prioritising workforce development to upskill professionals around the circumstances and parameters that may impair mental capacity (e.g., trauma affecting cognitive and decision-making skills; alcohol and substance use; impaired executive functioning; peer pressure; coercive relationships).

Overall, the importance of showing constant professional curiosity when exploring a young person's understanding of the risks and dangers associated with sexual/criminal exploitation and extra-familial harm is promoted across Greater Manchester.

## Recognising and challenging inequalities

Greater Manchester acknowledges that child exploitation and extra-familial harm can affect anyone, irrespectively of age, gender, ethnicity, abilities, or geographical area. However, in the light of national research, Greater Manchester also recognises that some groups of children and young people are at greater risk of being exploited and abused than others.

Indeed, socio-economic inequalities, marginalisation, learning difficulties, school exclusions, drug and alcohol dependencies, mental ill-health and other factors can both increase the likelihood of child exploitation and constitute barriers to accessing equal support.

For this reason, the importance of adopting an intersectional approach to exploitation, and of using empowering language as a way to challenge victim-blaming, is fully accepted.

Greater Manchester also recognises that not all vulnerabilities and disabilities are visible and has worked hand-in-hand with third party agencies such as The National Autistic Society to increase professional awareness around learning disabilities and neurodiversity<sup>10</sup>.

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<sup>10</sup> See Appendix 2 for further details on the links between exploitation and neurodiversity.

Principle 2 of the Tackling Child Exploitation framework places discussions around inequalities at the core of practice by encouraging all practitioners to “recognise and challenge inequalities, exclusion and discrimination”.

Our approach centres around awareness of “disproportionality”. This includes the under- and over-representation of some groups of children and young people in data or services, and the “assumptions and negative stereotypes that underpin these”<sup>11</sup>. It also involves questioning and challenging ourselves as a wider system, for instance by recognising that inequalities affect outcomes for certain groups of children and young people (see Appendix 2).

Our central Complex Safeguarding Hub will continue to nurture relationships with voluntary organisations such as Listen Up, 84Youth and Afruca, who have conceptualised the inequality and systemic trauma faced by black children and worked to amplify the voices of marginalised children. Greater Manchester will keep abreast of research that has highlighted issues for this particular group, such as Adulthood bias and over-policing.<sup>12</sup>



The term **Adulthood** has been defined by Listen Up as follows:

*“The concept of Adulthood is when notions of innocence and vulnerability are not afforded to certain children. This is determined by people and institutions who hold power over children and young people.”*

## Learning from Lived Experience and Peer Reviews

### Lived Experience as Expertise

Greater Manchester vows to keep on finding innovative ways of incorporating the voices of children and young people, as well as parents and carers, across all services, ensuring lived experiences hold substantial weight in strategic and operational decision-making. More than being a mere “after-thought”, lived experience will be automatically involved and embedded at the core of GM systems.

We believe in a participatory approach to ensure that our practice keeps on meeting the needs of those impacted by exploitation and extra-familial harm and responding to the ever-changing

<sup>11</sup> See [Multi-agency Practice Principles for responding to child exploitation and extra-familial harm](#), p.17.

<sup>12</sup> See for instance [Double Discrimination Report](#), p.4, on the links between adulthood and excessive encounters of stop and search and use of force.

nature of these threats. This strategy and the core principles guiding it have been developed using lived experience as expertise, making sure the voices of victims and survivors of child exploitation and associated harms drive all multiagency efforts towards making Greater Manchester a safer place. Consultation with voluntary agencies that place lived experience at the core of their delivery (such as Lads Like Us, The Reign Collective, 84Youth or St Giles) is also a regular practice when reviewing policies and practices.

## **Multiagency Peer Review Process**









The Complex Safeguarding peer reviews constitute part of the Greater Manchester Children's system commitment to sector-led learning and improvement and ensure that best practice and learnings are disseminated across all ten local authorities. The reviews are an opportunity for Social Care, Police and Health professionals to work with an independent panel of experts, examine a set of recent complex safeguarding cases and from this, draw out areas of reflection to strengthen practice. This includes strengthening partnership responses to all forms of extra-familial harm and exploitation of children and young people.

## **Capturing our Impact**




Our comprehensive insight and impact framework has ensured that Complex Safeguarding professionals across Greater Manchester are kept regularly informed on the extent and many forms of exploitation faced by children and young people. The framework allows a timely understanding of trends, vulnerability factors, sources of harm, and outcomes for those supported by our teams. Outcomes are person-centred, focused on strengths, stability, trusted relationships, and personal goals achieved.

The framework shows that throughout 2022-23, a total of **1,246 referrals** were made into the ten Complex Safeguarding Teams across Greater Manchester, with an average of **540 young people** being worked with at any one time.

It also helps us understand the multitude of vulnerabilities faced by children and young people. Through the framework, we know that among the individuals known to Complex Safeguarding:

-  More than half have “missing from home” reports.
-  More than half have substance misuse issues.
-  More than 1 in 3 have additional needs, learning difficulties or disabilities.
-  Around 1 in 4 have a parent accessing support.
-  Around 1 in 4 are accessing mental health support.
-  Around 1 in 4 are attending a pupil referral unit or alternative provision.
-  Around 1 in 4 are open to youth justice services.
-  More than 1 in 10 have speech and language needs.

The framework also evidences the considerable positive impact that engaging with Complex Safeguarding teams has on children and young people. In 2022-23, outcomes reported at case closure show that around 9 out of 10 of those supported by teams had:

-  A stable living arrangement (90%).
-  Formed at least one positive, trusted relationship (89%).
-  Achieved goals they had set, where they had been agreed (92%).

## Governance Arrangements

Effective governance arrangements are in place across Greater Manchester to ensure a wider system approach designed to tackle the multi-faceted nature of exploitation.

Complex Safeguarding features as one of the key priorities in the Greater Manchester Children & Young People’s Plan. As such, the Children’s Board alongside Greater Manchester’s Deputy Mayor and The Safeguarding Alliance ensure senior leadership oversight over the activities of the Complex Safeguarding Executive Board.

This Executive Board drives consistency across each of the various Greater Manchester Complex Safeguarding priorities, ensuring that an appropriate response is delivered at a strategic and operational level across the area.

It presides over the Greater Manchester Complex Safeguarding Steering Group, which in turn informs, learns from, and oversees the Greater Manchester Exploitation Operational Group, co-chaired by Greater Manchester Police and GM Complex Safeguarding Hub.

The subgroups respectively attached to each of the ten local authorities are in attendance at the appropriate seniority level at the Steering Group and Exploitation Operational Group meeting to ensure that best practice is shared with their teams.

The GM Complex Safeguarding Executive Board also maintains direct strategic links with the Challenger Executive Board to foster collaboration and avoid siloed workstreams.

At local level, governance is managed through multi-agency safeguarding arrangements that are specific to each area.

## Next Steps

The Greater Manchester Complex Safeguarding Executive Board will seek assurance on the implementation of the vision and objectives at the heart of this strategy, checking that it delivers against its commitments. The Steering Group will drive relevant strategic activity across our partnership networks, and changes to practice will be directly supported by the GM Complex Safeguarding Hub across all ten local authorities.

The implementation of this Complex Safeguarding strategy will remain directly aligned to wider priorities under the *Greater Manchester Children and Young People's Plan* and will continue to support the region's commitment towards safeguarding children and young people against exploitation and extra-familial harms.

The Greater Manchester Complex Safeguarding Hub will continue to play a leadership role in bringing key partners together, thus ensuring that the approach to tackling exploitation outlined by the strategy is sustainable and brought to life by collaborative working.

## Appendix 1 – Links to Key Programmes

- **Programme Challenger** was launched in 2013 to implement Greater Manchester’s partnership approach to tackling serious organised crime in all its forms, including modern slavery and the criminal exploitation of children and adults.

The team works closely with local authority social care, health, and voluntary organisations to ensure that victims are identified at the earliest possible stage and provided with the support they require, and that criminals perpetrating harm in the context of child exploitation are brought to justice.

Programme Challenger’s vision, aims, and governance links to Complex Safeguarding can be found [here](#).

- **Greater Manchester Violence Reduction Unit (VRU)** has worked in a joined-up way with the ten GM local authorities to reduce harm, safeguard individuals, and foster communities’ wellbeing by strengthening resilience and aspirations.

Since its launch, the team has worked with schools, colleges, hospitals, police, criminal justice partners, charities, and most crucially with communities to tackle violence and its root causes, with a primary focus on children, young people, and families.

The VRU strategy revolves around two pillars – Prevention and Response – and a set of five principles, in full harmony with the Complex Safeguarding ones: Community-led Approach; Early and Timely Intervention; Partnerships for Change; Equality, Equity and Justice; Trauma-Responsive City-Region.

Their objectives and strategic commitments can be found [here](#).

- **Greater Manchester Police’s Child-Centred Policing (CCP) Strategy** synergises with the ambitions of Greater Manchester Complex Safeguarding. With a shared focus on prevention and early intervention, both structures aim to prevent the unnecessary criminalisation of children and young people, recognising that this cohort presents with different needs and that their behaviours may be an expression of trauma – which can be compounded by negative or regular interactions with the police.

Through consistent partnership work, GM Complex Safeguarding Hub and GMP will continue to challenge the negative labelling of children and young people, develop consistent processes and structures across Greater Manchester, and implement a robust workforce development approach, upskilling police staff at all levels to better understand vulnerabilities.

The CCP delivery plan is split into four areas: Prevention and Engagement, Alternative Outcomes to Arrest, Custody, and Investigations. Their five priorities fully aligned with the Complex Safeguarding principles and focus on: trusted relationships; child-first approach; reducing reoffending; understanding vulnerabilities and working creatively with communities.

## Appendix 2 – Further Research-Based Reflections

### Definition of Adolescence

Whilst there is currently no agreed definition or legal framework for the term *adolescent* in the UK or worldwide, latest research suggests that it expands beyond teenage years. In fact, the findings of social cognitive development studies suggest that brain maturation carries on until the age of 25 i.e. what is considered to be *early adulthood*.

Sawyer et al, 2018, further elaborate on the need of defining adolescence to responds more effectively to its particular needs: *“An expanded and more inclusive definition of adolescence is essential for developmentally appropriate framing of laws, social policies, and service systems. Rather than age 10-19 years, a definition of 10-24 years corresponds more closely to adolescent growth and population understandings of this life phase.”*

As articulated by Firmin et al. in their 2019 briefing, the nature of the risks associated with adolescence often differs from earlier childhood, and so do their needs. Considering parameters such as public spaces, online platforms, peer norms and relationships, among others, becomes paramount to ensure that adolescents are protected.

### Trauma-Informed Approach

Evidence of the pervasive, enduring, and costly impact of trauma on children and adolescents’ behaviour and development has been emerging for decades. To develop practices that are truly responsive to trauma, it is essential to adopt a multifaceted and multi-agency approach across systems and partnerships, but also a long-term commitment within every level of operational management and strategic leadership.

Evidence is also unequivocal that those who work with victims of trauma or traumatic material are more likely to experience secondary or vicarious trauma, work-related stress, compassion

fatigue or burnout. This not only has a significant personal impact on staff, such as sickness, stress, and dissatisfaction; if left unaddressed, this can lead to a high turnover, vacancies and a workforce that are physically, emotionally, and cognitively compromised and thus cannot, do their jobs to the best of their ability. Creating a culture that is trauma-responsive and actively considers the impact of trauma on the workforce, and takes steps to mitigate this, should be central to any strategy.

See the [Greater Manchester Resilience Hub: Pennine Care NHS Foundation Trust](#) website for more information regarding Greater Manchester's trauma-informed approach to Complex Safeguarding.

## **Mental Capacity**

Under the Children Act 1989, a “child” is defined as anyone who has not yet reached their 18<sup>th</sup> birthday. The Mental Capacity Act 2005, on the other hand, distinguishes between “children” under the age of 16, and “young people”, between the ages of 16 and 18. This conflict is a complex issue for Health and Care professionals when balancing out the implications of the Mental Capacity Act, their duty of care, and responsibilities under safeguarding procedures.

## **Neurodiversity and Exploitation**

The definition of “neurodiversity” (or “neurodivergence”) has been source of debate for years. In a recent report, the Ministry of Justice defined it as a “list of difficulties, differences, conditions, and disorders including, but not exclusive to, learning disabilities, learning difficulties, Attention Deficit Hyperactivity Disorder (ADHD), Autism and Acquired Brain Injury. Although neurodivergence is distinctly different from mental health needs, it is important to recognise that there is a high likelihood of co-occurrence between neurodivergence and mental health needs.”

Neurodivergent children and young people are disproportionately represented within the criminal justice system and present increased risks of exploitation due to a multitude of factors:

- An ability to “mask” some of the challenges and vulnerabilities experienced, often by “copying” the behaviours of others to fit in.
- Difficulties inherent to conditions like ASD or ADHD, such as struggling to read people's harmful motives or intentions.

- Social isolation and increased risk of being groomed into unhealthy relationships as a result of needing social contact.
- Social communication differences, which can lead to misunderstandings (e.g., around consent) or literal understanding.
- A history of trauma, including bullying and discrimination.

## **Unaccompanied Asylum-Seeking Children and Exploitation**

Unaccompanied Asylum-Seeking children may have experienced exploitation and trafficking both internationally and locally. This group of children may be disadvantaged due to various factors including but not limited to language needs, lack of a support network, trauma as a result of conflict and other crises.

Barnardo's offer a specialist risk assessment and support service to this group of young people under the Independent Child Trafficking Guardianship (ICTG) scheme. The ICTG service is outlined within Section 48 of the Modern Slavery Act. It is commissioned by the Home Office and delivered by Barnardo's National Counter Trafficking Centre in sites across England and Wales, including Greater Manchester. The ICTG service offers direct support for children (aged under 18) who have been exploited through trafficking and Modern Slavery. Indirect support is also provided through advice and guidance for professionals working with young people who are victims of trafficking and Modern Slavery. Their aim is to work collaboratively with partner agencies to ensure that young people who are victims of trafficking and Modern Slavery receive support in line with their needs.

Referrals to the ICTG service should be made when a child is identified as a victim of trafficking and/or exploitation. See their [website](#) for more information.

## **Appendix 3 – Partners Involved in Strategic Consultation**

This strategy sought to collect the views of a multitude of stakeholders across statutory and voluntary agencies, and was written in collaboration with –

**Greater Manchester Local Authorities**

**Greater Manchester Police**

**Programme Challenger**

**Greater Manchester Violence Reduction Unit**

**The University of Manchester**

**NHS England**

**NHS Greater Manchester Integrated Care Board**

**Greater Manchester Resilience Hub**

**Association of Directors of Adult Social Services**

**Research in Practice**

**The Children's Society**

**Barnardo's**

**The Reign Collective**

**The National Autistic Society**

**The NWG Network**

**North-West Regional Organised Crime Unit**

**Greater Manchester Health & Justice (Learning Disability & Autism) Steering Group**

## Appendix 4 – Related Strategies

Complex Safeguarding Delivery Plan for Greater Manchester, 2019-2021.

[Greater Manchester Children and Young People's Plan](#), 2019-2022.

[Greater Manchester Serious and Organised Crime Strategy](#) (Programme Challenger).

[Greater Manchester Violence Reduction Unit – “Greater than Violence”](#), 2024-2034.

[Greater Manchester Police and Crime Plan – “Standing Together”](#), 2022-2025.

Greater Manchester Police Child-Centred Policing Strategy and Delivery Plan, 2024-2025.

[Greater Manchester Young People and Adults Complex Safeguarding Strategy, 2022-2023](#).

[National Strategy for the Policing of Children & Young People](#).

[Greater Manchester Integrated Health and Justice Strategy](#), 2020-2024.

[Greater Manchester All Age Autism Strategy – “GM Autism Friendly”](#), 2022-2025.

## Appendix 5 – Bibliographical Resources

[Report of the Independent Inquiry into Child Sexual Abuse](#), October 2022.

[Child Exploitation Disruption Toolkit](#), Home Office, updated September 2022.

[Working Together to Safeguard Children 2023: A Guide to Multiagency Working to Help Protect and Promote the Welfare of Children](#), UK Government, December 2023.

[Serious Violence Strategy](#), UK Government, April 2018.

[Child Exploitation Disruption Toolkit](#), UK Government, updated September 2022.

[Criminal Exploitation of Children & Vulnerable Adults: County Lines](#), UK Government, updated October 2023.

[A Response to the Criminal Justice Joint Inspection: Neurodiversity in the Criminal Justice System](#), July 2021.

[‘My life could be so different’: Experiences of autistic young people in the youth justice system](#), National Autistic Society, 2022.

[Multi-agency Practice Principles for responding to child exploitation and extra-familial harm](#), Tackling Child Exploitation Programme, 2023.

[Practice Principles Partnership Reflective Tool](#), Tackling Child Exploitation Programme, 2023.

[Double Discrimination: Black Care-experienced Young Adults Navigating the Criminal Justice System](#), September 2023.

[Language Matters: Use of Language in Child Sexual Abuse and Exploitation Practice](#), guide by Barnardo’s, 2022.

Sawyer, S.M., Azzopardi P.S., Wickremarathne D., Patton G.C. [The Age of Adolescence](#). Lancet Child Adolescent Health, 2018.

Firmin C., Horan J., Holmes D., Hopper G. [Safeguarding during Adolescence: the Relationship between Contextual Safeguarding, Complex Safeguarding and Transitional Safeguarding](#). Darlington: Research in Practice, 2019.

Holmes D., and Smale E. Mind the Gap: Transitional Safeguarding – Adolescence to Adulthood. Darlington, Research in Practice. 2018.