

Reflections on Government Child Sexual Exploitation Progress Reports (Third and Fourth Composite Reports)

14 December 2018

“The human, social and economic costs of denying children’s rights to protection are enormous and unacceptable.”

(UN Committee on the Rights of the Child, General Comment No.13: The right of the child to freedom from all forms of violence)

“CSE is an issue that threatens the safety and well-being of every child in Northern Ireland.”

(Independent Inquiry into Child Sexual Exploitation in Northern Ireland)

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Reflections on Government Child Sexual Exploitation Progress Reports (Third and Fourth Composite Reports)

Summary

- The Independent Inquiry into Child Sexual Exploitation in Northern Ireland was initiated by the Ministers for Health, Justice and Education in 2013 and published its report in November 2014.¹ Ministers made a commitment that Departments would implement the wide ranging Inquiry recommendations and would publish six monthly Progress Reports.
- Over the intervening four year period, four rounds of progress reports have now been published. In October 2015 NICCY produced a review of Departmental Child Sexual Exploitation (CSE) Implementation Plans² and in November 2016 completed an assessment of the first two rounds of Progress Reports.³ NICCY found that Implementation Plans and Progress Reports were fragmented, inconsistent and needed to more directly address the substance of the Inquiry's recommendations. The Commissioner called for Government to ensure independent oversight was in place to assess whether responses to CSE were improving protection and support for children.
- Departments have recently released third and fourth CSE Progress Reports and NICCY is disappointed that much of our previous advice about the need to improve and strengthen the reporting process has yet to be taken account of. The Commissioner remains of the view that **Government must do more to demonstrate that learning from the Independent Inquiry into CSE is ensuring that children and young people are being better protected and that those who seek to exploit and abuse them are being effectively pursued.**

¹ The Inquiry was established following the police investigation Operation Owl into cases of CSE involving twenty two 'looked after' children. At the same time the Health Minister directed the Safeguarding Board for Northern Ireland to undertake a thematic review into these cases and this was published in December 2015.

² NICCY (2015) Initial Reflections on CSE Action Plans. Available at:
<https://www.niccy.org/about-us/our-current-work/high-level-corporate-objectives/children-s-right-to-health-protection-from-violence-or-abuse/child-sexual-exploitation-cse/>

³ NICCY (2016) Review of Government CSE progress Reports. Available at:
<https://www.niccy.org/about-us/our-current-work/high-level-corporate-objectives/children-s-right-to-health-protection-from-violence-or-abuse/child-sexual-exploitation-cse/>

Children's Rights

- The United Nations Convention on the Rights of the Child recognises that children as rights-holders have special rights to protection from abuse, exploitation and trafficking and to be supported in their recovery from abuse. In 2016 following examination of the UK and devolved governments, the United Nations Committee on the Rights of the Child highlighted that in Northern Ireland the recommendations of the Independent Inquiry into CSE must be implemented.⁴ NICCY also notes that the UK Government ratified the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (the Lanzarote Convention) on 20 June 2018 and is required to fulfil its obligations under the Convention.
- The Independent Inquiry into CSE concluded that CSE “must be regarded as a significant and growing threat to the welfare of children and young people” in Northern Ireland and assessed how well statutory services and other organisations were protecting children and taking action against abusers.⁵ The Inquiry set out a wide range of recommendations (77 in total with 17 key and 60 supporting recommendations) across health and social care, education and policing and justice.
- Importantly, Inquiry recommendations were developed holistically and identified where improvement was needed across: prevention and early intervention to minimise risk of children being harmed by CSE; intervention, protection and recovery to safeguard and support children subjected to CSE; and investigation and prosecution of perpetrators. If properly implemented the recommendations across these areas would ensure Northern Ireland responded more effectively to CSE. In relation to recommendations regarding criminal justice agencies, NICCY has also addressed these in the Commissioner’s advice to the current review by Sir John Gillen of the law and procedures in serious sexual offences cases in Northern Ireland.⁶
- The Commissioner recognises the tireless work of professionals (from both statutory and non-statutory organisations), families and young people themselves in protecting children from CSE. However NICCY is concerned that since publication of the Inquiry

⁴ Committee on the Rights of the Child (2016) Concluding observations on the fifth periodic report of the United Kingdom of Great Britain and Northern Ireland.

⁵ K. Marshall (2014) Child Sexual Exploitation in Northern Ireland: Report of the Independent Inquiry. Belfast: RQIA, pp14.

⁶ Available at: <https://www.niccy.org/publications/2018/september/07/review-of-sexual-offences-cases/>

report in 2014, Progress Reports have not sufficiently demonstrated that real improvements in tackling CSE have been achieved.⁷

⁷ NICCY acknowledges that the reporting process developed by Departments may simply be failing to report evidence of positive change that has in fact taken place.

Commentary on CSE Progress Reports

Following publication of Departmental CSE Implementation Plans, NICCY released a review of these in October 2015 and provided a thematic assessment of the first and second rounds of Progress Reports in November 2016 with a further advice paper in February 2017.⁸ This latter paper set out the Commissioner's concerns about the quality of information provided by Departments in Progress Reports and gave concrete examples of the type of detail that should be included in reports. Building on these themes, we will again consider whether the most recent Progress Reports have incorporated this advice and are able to demonstrate evidence that implementation has provided:

- Assurance and accountability across Departments and statutory agencies;
- Positive impact and improved outcomes for children and young people; and
- Delivery within acceptable timeframes.

Following a discussion of these themes further detailed comment is provided in appendix one against all seventeen of the Inquiry's key recommendations and a third of the sixty supporting recommendations from across the three spheres of health and social care, education and justice and the three areas of prevention, protection and prosecution.

NICCY would like to thank organisations working directly with children and young people who have shared their experiences with us as part of this work. Their experiences have helped to shape our reflections.

Assurance and accountability

Until September 2018 Departments, who originally committed to reporting on implementation on a six monthly basis, had not provided an update on their work since 30 June 2016. In the interim, NICCY repeatedly called for CSE Progress Reports to be published and welcomes the release of the third and fourth rounds of reports. However, we note that these are now one year out of date and only cover the period up to November 2017.

⁸ Available at: <https://www.niccy.org/about-us/our-current-work/high-level-corporate-objectives/children-s-right-to-health-protection-from-violence-or-abuse/child-sexual-exploitation-cse/>

It is positive that a single composite report from all three Departments has been produced for the third and fourth reporting rounds rather than three individual Departmental reports followed at a later date by a composite report as had been the case prior to this. It is also helpful that Progress Reports now include reporting against all the Inquiry's recommendations as this had not been done consistently. We particularly welcome the inclusion of reporting by the Safeguarding Board for Northern Ireland (SBNI) for the first time and the detail provided by the Board in its input.

These changes to the reporting format go some way to addressing NICCY's previous concerns about the fragmented nature of reporting by Departments. We must however highlight that the single reporting format still does not include recording against outcomes which some Departments, such as the Department of Justice (DoJ), had committed to in their individual reports. This lack of attention to the impact and outcomes of implementation is a recurrent theme in our comments. NICCY does not underestimate the challenge of implementing such a wide range and large number of recommendations but remains concerned that documenting implementation against outcomes for children and young people has not been progressed.

In relation to NICCY's previous concerns that Departments have not demonstrated that implementation is being taken forward across their respective families of statutory agencies we are disappointed that this has not been adequately addressed in the third and fourth Progress Reports. Reports should include information on the assurances sought by Departments to evidence that recommendations have been effectively implemented by statutory bodies. For example, in highlighting the key role of schools in raising awareness of and identifying CSE, the Inquiry recommended that schools should ensure that Relationships and Sexuality Education (RSE) is provided by those with the skills and confidence to do so (supporting recommendation 31) and the Department of Education (DE) has recorded this as completed stating that the Council for Curriculum, Examinations and Assessment (CCEA) has produced revised RSE guidance.⁹ Whilst the publication of updated guidance is welcome this does not address how the impact of the revised guidance has been tracked from the Department through CCEA to the quality of provision in schools, which is the focus of the recommendation. In 2016 the Education and Training Inspectorate in an evaluation of primary and special schools, reported that "a majority of schools identified that the teachers lack confidence and/or are uncomfortable in delivering

⁹ CCEA (2015) Relationships and Sexuality Guidance: An update. Guidance for primary and post primary schools available at:
http://ccea.org.uk/curriculum/rse_primary

the sensitive aspects ...” of RSE, such as child abuse, and require specific training on this.¹⁰ NICCY previously raised this point and is disappointed that the recent reports do not indicate how DE has ensured this has been properly addressed.

Turning to health and social care and justice and policing, the Inquiry recommended that the Department of Health (DoH) and Department of Justice (DOJ) should develop guidance for parents and carers, including foster carers and residential workers, on how to best capture information and/or evidence when a child returns from a period of going missing or is otherwise considered to be at risk of CSE (key recommendation 3). Earlier Progress Reports recorded this recommendation as completed stating that, as well as agreeing a HSCB/PSNI Missing Children Protocol, the Health and Social Care Board (HSCB) had developed and electronically circulated leaflets for parents and carers to professionals. Recent reports do not provide any assessment of this leaflet, including whether it has improved confidence amongst parents and foster carers in capturing information, whether there has been an increase in the recording and reporting of information and this has led to better informed interventions to protect children and disrupt CSE. Nor does it outline the steps that will be taken to measure the impact of this activity.

These examples illustrate NICCY’s concern that Departments have not developed assurance or accountability mechanisms to ensure that implementation is monitored and evidenced across the full range of statutory bodies and agencies.

Outcomes for children and young people

The lack of attention given to the outcomes of implementation in reports means they can be largely descriptive of ongoing work or processes rather than documenting how changes are improving the way services operate and supporting good frontline practice. For example, the Inquiry recommended that Health and Social Care Trusts (HSCTs) should endeavour to provide stability by minimising the movement of both children and staff throughout residential and foster care settings (supporting recommendation 25). Related to this area, SBNI’s Thematic Review of CSE cases also discussed the importance of fostering relationship based practice between young people and dependable adults as central to protecting and ensuring children’s safety and wellbeing.¹¹ NICCY has previously

¹⁰ ETI (2016) Relationships and Sexuality Education in Primary and Special Schools: Report of an evaluation by Education and Training Inspectorate; pp7.

¹¹ Pinkerton J., Bunting L., Hayes D. and Lazenbatt A. (2015) Getting Focused and Staying Focused: “Looked After Children” Going Missing and Child Sexual Exploitation. Belfast: SBNI.

noted concern that the ten pages of information provided in the second Progress Report on this recommendation gave only general information on plans and agreed statements and did not demonstrate how concrete change in placement stability had been achieved. It is disappointing that no update or further detail is provided in the third or fourth reports. For instance, no data on previous and current placement moves is provided, including within foster care, and no feedback from staff, carers or children and young people is given. We again highlight that recommendations should not be assessed as completed if detail of impact and outcomes cannot be provided.

In relation to the Inquiry recommendation to PSNI that in its review and development of Public Protection Units, it should move to develop perpetrator profiling and a greater focus on perpetrators (supporting recommendation 50) we note that the need for improved police profiling and network analysis was also highlighted by SBNI's 2015 Thematic Review of CSE.¹² While the information provided in earlier Progress Reports on structural change within the police is useful it does not address how this has ensured a greater focus on perpetrator profiling which is the substance of the recommendation. For example, the recommendation has been reported as completed but there is no indication that, for instance, increases in active CSE disruption have been tracked, that there is improved progression of cases through the criminal justice system and sustained resourcing of such work. We note that the recently published CJI Thematic Inspection of Sexual Violence and Abuse Cases has recommended that the resourcing of the Public Protection Branch should be reviewed and reassessed.¹³

In considering recommendations made to Departments, the Inquiry concluded that the DoJ should establish an interagency forum drawn from across the justice sector and third sector stakeholders to examine how changes to the criminal justice system can achieve more successful prosecutions of the perpetrators of CSE and that this must be informed by the experiences and needs of child victims (key recommendation 9). The Inquiry placed this recommendation in the context of the low conviction rate for sexual offences, the vulnerability of victims, their lack of trust in statutory agencies and lack of confidence in the justice system. The recommendation is reported as ongoing but we note our serious concern that to date only a single workshop has been held with DoJ not yet publishing their response to the workshop report. No substantive detail of work undertaken in this area is given, no report publication date or timeframe for bringing forward concrete

¹² Pinkerton J., Bunting L., Hayes D. and Lazenbatt A. (2015) Getting Focused and Staying Focused: "Looked After Children" Going Missing and Child Sexual Exploitation. Belfast: SBNI.

¹³ CJI (2018) Without Witness: Public Protection Inspection 1: A thematic inspection of the handling of sexual violence and abuse cases by the criminal justice system in Northern Ireland. Belfast: CJINI.

changes is provided and no update on the mechanism to ensure children's experiences and needs are heard which was referenced in the second Progress Report is included. We warmly welcome the attention given to this and related Inquiry recommendations by the preliminary report of the Gillen Review into serious sexual offences in Northern Ireland which notes the need for the recommendations to be taken forward "in order to ensure better outcomes for victims of all sexual offences against children and for justice more widely".¹⁴

In a different example, the Inquiry recommended that DE should give guidance to schools on how they can provide flexible support sessions about CSE that are accessible for parents of disabled children (supporting recommendation 5). The second Progress Report stated this was completed again citing the publication of revised RSE guidance. While the guidance highlights the need for teaching for vulnerable groups, such as children with SEN, as well as the need for communication with parents and carers and states that schools may wish to provide parents with leaflets, share resources or hold awareness raising workshops it gives no further detail on this and makes no specific reference to CSE in this context.¹⁵ Progress Reports do not indicate, for instance, if the guidance is being used by schools, does not detail the number of schools that have engaged with parents or offered sessions or report if feedback from staff and parents who have participated in these has been gathered.

In the final example in this section, the Inquiry made a number of interrelated recommendations in regard to practice and services across health and social care and policing and justice which have been reported as completed and where NICCY has concerns that evidence of implementation has not been provided. This includes ensuring that there are clear reporting pathways 24 hours a day, seven days a week; that existing out of hours services across the health, social care and police sectors are co-ordinated and strengthened; that return from missing interviews are effective and that safeguarding evidence is collected and that the HSCB Children Missing from Home or Care action plan is revised and updated (key recommendation 11 and supporting recommendations 54, 18 and 16). Progress Report commentary on these, again, points to the restructure of PSNI Public Protection Units and social services teams as well as the revised Runaway and Missing from Home or Care Protocol. While there has been structural and procedural

¹⁴ Sir John Gillen (2018) Preliminary report into the law and procedures in serious sexual offences in Northern Ireland; pp.343. Available at: <https://gillenreview.org/news/preliminary-report-justice-delivery-around-serious-sexual-offences-published-consultation>

¹⁵ CEEA (2015) Relationships and Sexuality Guidance: An update. Guidance for primary and post primary schools. Available at: http://ceea.org.uk/curriculum/rse_primary

change, it is not clear that this has resulted in improvements in safeguarding outcomes for children. For instance, a 2016 HMIC inspection of PSNI found the police response to missing children “not consistently good” noting variation in the risk assessments of missing children, underlying issues of missing episodes not being addressed and no consistent process to provide police with information from return interviews.¹⁶ More recently RQIA have reported that while awareness of CSE is more evident in HSCT files, the out of hours social services team do not use the regional assessment and recording tool and highlight that information from out of hours must be shared consistently with Trusts.¹⁷ These concerns raise questions about DoH’s assessment in the second Progress Report that action taken “now ensures both agencies [social services and police] have dedicated experienced personnel available at the front door to deal with all safeguarding matters including CSE”.

Concerns about lack of an outcomes focus become more significant as Departments assess a growing number of recommendations as having been delivered or completed without evidence of change. The fourth Progress Reports lists over 80% of recommendations as now complete. As well as giving rise to concerns about poor progress in implementation, NICCY notes that the lack of attention to capturing impact means that reports fail to reflect the positive change that implementation may be having on services and practice. For example, the 2018 RQIA Review of Child Protection while not having an explicit focus on CSE did report that HSCT files showed an increased awareness of CSE and of CSE risk assessments being undertaken and this is to be welcomed.

Timescales

Four years on from publication of the Independent Inquiry’s report it is of concern that timelines for a range of recommendations have remained, or become, extended as we have previously reported. In considering recommendations made to DoJ, it is disappointing that the recommendation on strengthening the law to better protect children from CSE (for example, by ensuring protections from sexual offences legislation extend to all children under 18 years) has not yet resulted in concrete policy or legislative proposals and that no definitive timescale for this is provided (key recommendation 14). NICCY has repeatedly stated concern about the absence of progress on this recommendation and notes that it is

¹⁶ HMIC (2016) PEEL: Police effectiveness: vulnerability, An inspection of the Police Service of Northern Ireland, pp3.

¹⁷ RQIA (2018) Review of the Governance Arrangements for Child Protection in the HSC in Northern Ireland. Belfast: RQIA).

disappointing that this was not pursued prior to the collapse of devolved government. We highlight that similar recommendations have also been made by other bodies, including the UN Committee on the Rights of the Child.¹⁸ We also note that DoJ should review its work in this area following the UK Government's recent ratification of the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (the Lanzarote Convention). NICCY further notes that the Gillen Review preliminary report highlights unacceptable delay in this and other areas and while we understand that the Department are intending to consult on reform we urge that this is now progressed directly.¹⁹

The development of a regional strategy, led by DoH and supported by DoJ and DE, was another key recommendation of the Inquiry (key recommendation 15) and the first DoH Progress Report noted a draft strategy was to be brought forward by an implementation group which included DEL and DARD (now DfE and DAERA respectively) to be consulted on in June 2016 and published in June 2017. This has not happened and no clear commitment to a strategy is given in the fourth report and no further reporting by or reference to DfE and DAERA has been made. Hyperlinks in the second Progress Report to mapping and assessment exercises cited did not work and no further information on these is provided. The third Progress Report states Departments have agreed to delay implementation until the end of phase three (though it is not noted when this is) when they will jointly assess any gaps and the need for a further strategic response.

It is concerning that Departments remain at the stage of assessing whether a strategy is necessary. NICCY highlights the 2016 HMIC conclusion that a factor in inconsistent police responses to missing children was that there "is no overarching strategy in place for CSE and this is leading to different approaches being taken in different trust areas."²⁰ We raised this issue in our 2016 review and are again concerned that recent Progress Reports give no update on how Departments and statutory agencies have addressed this HMIC finding by making sure that either a strategy or other viable mechanism to ensure high standards of regional consistency is in place.

¹⁸ Committee on the Rights of the Child (2014) Concluding observations on the UK report on the Optional Protocol on the Rights of the Child on the sale of children, child prostitution and child pornography

¹⁹ Sir John Gillen (2018) Preliminary report into the law and procedures in serious sexual offences in Northern Ireland. Available at: <https://gillenreview.org/news/preliminary-report-justice-delivery-around-serious-sexual-offences-published-consultation>

²⁰ HMIC (2016) PEEL: Police effectiveness: vulnerability, An inspection of the Police Service of Northern Ireland 1-5 February 2016; pp24.

In considering education, the Inquiry recommended that DE must work with other Departments to ensure there are appropriate safeguarding arrangements in all non-statutory settings and this is reported as completed in the third Progress Report (supporting recommendation 30). In setting out this recommendation the Inquiry noted that all children should be protected without discrimination and NICCY highlights that this applies to safeguarding children in all non-statutory education settings, including Elective Home Education. Earlier reports reference that EA will consider safeguarding in new procedures being developed for Home Education but new procedures have not been published and no indication is given as to how EA and others will make sure that robust safeguarding arrangements are in place for this group of children. At no point in the reporting process has DE outlined how action taken in any setting has been assessed or monitored as impacting on safeguarding practices. We seek particular assurance about the basis on which DE has assessed this recommendation is completed across non-statutory settings including Home Education and also independent schools as a matter of urgency.

The Independent Inquiry published its report and recommendations in 2014 and, while NICCY recognises that some of these recommendations are complex and challenging, it is not acceptable that so little reported progress has been achieved in these and other examples in the intervening period.

Conclusion

The Commissioner continues to be disappointed that CSE Progress Reports have not sufficiently addressed issues previously raised by her office and still do not give adequate assurance that Departments and statutory agencies have taken forward and embedded learning from the Independent Inquiry to ensure that our laws, policies, services and practices are more effective at responding to the threat that CSE poses to children in Northern Ireland. The examples given in this discussion and the attached appendix highlight that this is the case across recommendations relating to education, health and social care and policing and justice and across the areas of preventing of CSE, protecting children subject to CSE and pursuing offenders. It is vital that there is a more robust reporting process which documents implementation against outcomes and includes the voices of and verification from practitioners, parents and carers and, of course, children and young people.

NICCY welcomes the current Criminal Justice Inspectorate (CJI) Investigation into CSE and the opportunities we have had to engage with CJI as this has developed. We encourage the other inspectorates who were part of the Independent Inquiry process to also undertake a thematic assessment or review of progress since 2014. We note that this could be incorporated into already planned inspection and review activity.

NICCY understands that SBNI intends to undertake a review of practice in relation to CSE based on the findings of the 2015 Thematic Review of CSE and we note that this will provide an important insight into how agencies are responding to sexual exploitation. It is also intended that ongoing work from the Departmental CSE implementation process will be incorporated into the newly established Child Protection Senior Officials Group chaired by DoH. NICCY recognises the potential of this group to progress work across child protection but cautions that, as well as addressing Independent Inquiry recommendations not yet completed, it should also seek assurances that recommendations reported as completed have led to positive change.

To conclude:

- It remains clear that government and statutory agencies must properly demonstrate how well they are implementing the recommendations from the Independent Inquiry into CSE in Northern Ireland. Departments must revise the reporting format that is currently used to include evidence of impact and improved outcomes.

- The Commissioner remains concerned that, because of weaknesses in the reporting process, assurances cannot be given about how effectively our arrangements to protect children are addressing CSE. NICCY therefore maintains the view that a form of independent oversight or review to monitor implementation in practice and highlights that this can be provided by the inspectorate bodies across health and social care, education and justice.

Four years on from the publication of the Inquiry report it is time to make sure that agencies across Northern Ireland are properly responding to the risks that CSE poses to our children and young people. Government action must lead to real change in how well we are protecting children, supporting those who work with them and investigating and prosecuting those who seek to abuse and exploit them.

Appendix One: NICCY comments on example recommendations from fourth CSE Progress Reports

All seventeen of the Independent Inquiry into CSE in Northern Ireland's key recommendations and a sample of the supporting recommendation are included below:

Recommendation		Lead	Progress	NICCY Comments
K1	In response to the reality of CSE identified in this report, the Department of Health, Social Services and Public Safety (DOH) should direct the Public Health Agency to undertake a public health campaign on CSE-related issues. This should complement the work undertaken by SBNI.	SBNI	<p>The SBNI have incorporated CSE awareness into their safeguarding and children and young people's welfare awareness programme.</p> <p>During the reporting period for this update the SBNI finalised delivery of phase 1 of training to the night time economy, utilising Barnardo's NI 'Night Watch' programme. The particular aims of the Programme are to protect children and young people from sexual exploitation by:</p> <ul style="list-style-type: none"> <input type="checkbox"/> supporting prevention through increasing awareness among front-line workers in statutory agencies during the night-time hours, by means of training on identifying and reporting CSE; <input type="checkbox"/> supporting preventions through increasing awareness among private sectors workers in the NTE by means of guidance, including through the use of new media, on identifying and reporting CSE; <p>increasing awareness of community members of CSE through community events and strengthening links between statutory services and the community;</p>	<p><i>We note that DoH reassigned this recommendation to SBNI and that this recommendation has been subject to resource restrictions.</i></p> <p><i>We do however welcome the information provided by SBNI and note that the third progress report gave additional detail, for example, on CSE awareness week. However, no clear intended outcome for this recommendation is identified and no evaluation of impact has been provided. For instance, has increased awareness amongst Night Time Economy (NTE) staff been achieved, has an increase in NTE reporting and referral been identified?</i></p> <p><i>We also note that the recommendation is reported as completed but SBNI state that only phase one of the Night Watch programme has been delivered.</i></p>

	Recommendation	Lead	Progress	NICCY Comments
			<ul style="list-style-type: none"> <input type="checkbox"/> increasing awareness of CSE amongst businesses and services working in the night-time economy; <input type="checkbox"/> providing advice, support, training and guidance to these businesses and their employees to be aware of CSE and know what to do if they encounter young people who are vulnerable and at risk; <input type="checkbox"/> facilitating employees to contribute to the identification and protection of children who are at risk at night. <p>Training was delivered to the Northern Ireland Fire and Rescue Service (NIFRS), Security Industry Authority (SIA) Door Supervisors, Taxi drivers and Voluntary organisations operating in the night time economy.</p>	
K2	The inquiry encourages the PSNI to pursue its commitment to strengthening relationships with communities and with young people as a priority in the context of the current climate of austerity.	PSNI	<p>The PSNI continue to deliver against this recommendation as part of their normal business.</p> <p>In the current reporting cycle, the PSNI have embarked on a number of transformational programmes with young people examples of which are outlined below:</p> <p>Young Leadership Programme (TALK) – The Transformation, Advocacy, Leadership and Knowledge programme is a young leadership programme developed by the United States Consulate in conjunction with the Northern Ireland Policing Board and the PSNI. The aim of the programme is to support and develop emerging young leaders in disadvantaged communities and to provide leadership at community level.</p>	<p><i>The detail provided here and in the third progress report (which for instance notes the Youth Volunteer Scheme and 2017 social media CSE week) while useful, does not demonstrate how relationships with young people, including those at risk of CSE, have been strengthened. NICCY noted this point in 2016 and is disappointed no substantiating information is provided following this. This could include, for example, detail on any increased reporting of CSE following the social media awareness week, evidence of the impact of the TALK programme and feedback from vulnerable young people and</i></p>

	Recommendation	Lead	Progress	NICCY Comments
				<p><i>communities on their experience of PSNI.</i></p> <p><i>The recommendation is reported as completed and we highlight that recommendations should not be assessed as completed without evidence that they have been delivered.</i></p>
K3	The DOH in conjunction with DOJ should develop guidance for parents and carers, including foster carers and residential workers, on how best to capture information and/or evidence when a child returns from a period of being missing or is otherwise considered to be at risk of CSE.	HSCB	Completed – see the first composite report for details.	<p><i>The first progress report in 2015 records this recommendation as complete stating the PSNI/HSCB Missing Children Protocol had been signed off and that a leaflet for parents and carers has been developed and electronically circulated to professionals. No assessment of the impact of this, including improvements in recording and reporting of information following a missing episode or when a child is considered at risk of CSE appears to have been undertaken. This should consider how implementation has supported parents and carers in capturing information and better informed interventions to protect children and disrupt and investigate CSE.</i></p>
K4	SBNI's developing plan for data collection should	SBNI	The SBNI have a Child Protection Sub-Group comprising the most senior members of the statutory agencies with	<p><i>The 2016 Review of SBNI highlighted that it did not have effective multi-agency</i></p>

	Recommendation	Lead	Progress	NICCY Comments
	include a commitment to collation and analysis of the data in a way that will facilitate a strategic response to CSE.		<p>responsibility for child protection. The group considered the range of child protection data available and the Board used this information to agree the Strategic priorities for the SBNI 2018 – 2022. The Board has highlighted the issues of Neglect, Domestic Violence and Mental Health, as key priority areas for this period. An outcomes framework will be adopted to measure how well intervention and actions are working. The Board have also agreed to use adverse childhood experiences information to support a trauma informed approach to practice and for the roll out of 'Signs of Safety' as a social work method of practice.</p> <p>As CSE is a context within which child sexual abuse occurs, it will manifest across numerous child safeguarding issues. As such the role of the Child Protection Sub-Group will ensure a continued strategic approach to how members respond to the issue of CSE.</p> <p>This group will continue to meet to ensure that the rationale behind what data to collect, and for what purpose, is clear from the outset, in order to move towards a more outcomes based approach for CYP.</p>	<p><i>mechanisms for monitoring and reporting CSE (2016 A Review of the Safeguarding Board for Northern Ireland, Jay and Somers). NICCY has repeatedly noted concern at the lack of progress on CSE data collection and that without robust data Northern Ireland continues to have a limited understanding of CSE prevalence and is therefore unable to effectively plan and resource responses to CSE.</i></p> <p><i>The recommendation is reported as completed but much of the information provided does not address the focus of the recommendation or provide a clear indication that the challenges of data collection have been addressed. Reports do not show how efforts to date have enabled a strategic response to CSE.</i></p>
K5	The DOH should explore the benefits of amending or adding to standards for inspection of children's homes to ensure that they: a) promote a culture	DOH	Completed – see the 2nd composite progress report for details.	<i>NICCY's 2015 review of CSE implementation plans highlighted concerns that the standards were not being amended. The DoH implementation plan stated guidance would be produced to accompany standards by December 2015. This is not</i>

	Recommendation	Lead	Progress	NICCY Comments
	<p>conducive to respect for the best interests of the child; and b) take account of the specific needs of separated and trafficked children and those affected by CSE. The DOH should issue a circular and associated guidance stating how these issues should be taken forward.</p>			<p><i>referred to in progress reports and no evidence is provided to indicate that inspections routinely assess whether children’s homes respect best interests and meet the specific needs of separated children and those affected by CSE as referenced in the recommendation.</i></p> <p><i>The second progress report stated that the Review of Regional Facilitates for Children and Young People would make recommendations for change to the framework of specialist provision and provision for separated children but it is unclear whether the report which is currently being considered by DoH, included specialist provision for separated children.</i></p>
K6	<p>The DOH, along with the HSC Board and HSC Trusts, should consider how “safe spaces” could be developed for children and young people at risk of, subject to, or recovering from CSE. This development should take account of models</p>	DOH	<p>VOYPIC have submitted a draft report into the findings of their research. Once the final report has been received, the Department will consider its recommendations and determine what additional work needs to be taken forward in order to fully implement this recommendation.</p> <p>The Department will continue to work with the HSC Board and Trusts, through the Children’s Services Improvement Board to deliver this recommendation.</p>	<p><i>The outcome of activities undertaken to date, including the important consultation with young people through VOYPIC, is not clear. No reference is made in this update to the SBNI series of workshops which were cited previously.</i></p> <p><i>We note concern that, while DoH highlights it is considering the VOYPIC report and will determine additional work</i></p>

	Recommendation	Lead	Progress	NICCY Comments
	of best practice and the views of young people, and should respect international human rights standards.			<i>following on from this, there is little detail of how learning to date has been progressed by the Department and others. No timeline for the future development of this work is given.</i>
K7	The Northern Ireland Assembly, through the Office of the First Minister and Deputy First Minister, should re-affirm its commitment to strategic, long-term and sustained funding of services for prevention and early intervention.	TEO	<p>Ongoing.</p> <p>Departments recognise the importance of investment and increased focus on prevention and early intervention services. This remains a strategic priority, and a range of commitments and investments have been made towards prevention and early intervention services in family and children’s services.</p> <p>The Department of Health’s 10 year approach to transforming health and social care, Health and Wellbeing 2026: Delivering Together, makes a commitment to enhance early intervention services and the Family Support Hub network by exploring ways to build the capacity of the Hub model.</p> <p>The Early Intervention Transformation Programme (EITP) is a £30m Delivering Social Change (DSC)/Atlantic Philanthropies Signature Programme which aims to improve outcomes for children and young people across Northern Ireland through embedding early intervention approaches. EITP is funded jointly by five government Departments (DoH, DE, DOJ, DfC and DfE) DSC and Atlantic Philanthropies from 2014/2015 until March 2019.</p>	<i>NICCY acknowledges government’s intended strategic focus on early intervention and the work of the EITP. However, progress reports should set out how effective prevention and early intervention services are being more sustainably funded and how they are improving outcomes for children and young people, including those at risk of or subject to CSE.</i>

	Recommendation	Lead	Progress	NICCY Comments
			<p>Following the expansion of the hubs and the introduction of the EITP, work has begun on the development of a new Family and Parenting Support Strategy. This will build on the achievements of Families Matter, and contribute to realising outcome 12 of the NICS Outcomes Delivery Plan – giving our children and young people the best start in life.</p> <p>While work on the new Strategy is being led by DOH, agreement has been obtained to proceed on a cross-departmental basis. The Strategy will maintain a focus on early intervention, and build upon the achievements of the Family Support Hub network and the EITP in helping families through the use of a multi-agency approach.</p>	
K8	<p>The Department of Education should conduct a review of youth services that takes account of the views of young people and aims to ensure that such provision is attractive and appropriate.</p>	DE	<p>The <i>Priorities for Youth</i> policy continues to be implemented and delivered through the Regional Youth Development Plan. Participation of young people as stakeholders on the Regional Advisory Group, Local Advisory Groups and development of all regional and local actions is central to and a key theme of the policy. As part of the 2016/17 Regional Youth Development Plan, the EA launched the Network for Youth pilot programme in December 2016, aimed at strengthening participation in the Youth Service at local, sub-regional and regional level. The pilot Network for Youth was extended on a further 15 month basis (until end March 2018). The network aims to increase links with School Councils during this period.</p>	<p><i>All four rounds of progress reports have focused on Priorities for Youth and Network for Youth (NFY). We note further information is not given on the 2017 review of the NFY pilot which was cited in the third progress report and no plans following the ending of the NFY pilot which was funded until March 2018 are given.</i></p> <p><i>The commentary does not provide examples of the influence of youth advisors on the regional and local bodies</i></p>

	Recommendation	Lead	Progress	NICCY Comments
				<p><i>or demonstrate how the attractiveness and appropriateness of provision has been improved. It is therefore unclear how this recommendation has been reported as completed.</i></p> <p><i>Children and young people's views on and experiences of youth work should be collected and reported on as part of this recommendation.</i></p>
K9	<p>The DOJ should establish an inter-agency forum drawn from across the criminal justice sector and third sector stakeholders to examine how changes to the criminal justice system can achieve more successful prosecutions of the perpetrators of CSE. This must be informed by the experiences and needs of child victims.</p>	DOJ	<p>In March 2016, the Department held a workshop involving a wide range of practitioners from the Criminal Justice and Health sectors as well as community and voluntary sector organisations that provide support to child victims.</p> <p>Following the workshop, and subsequent workshop report, a response paper and action plan to address the outstanding issues has been prepared by the Department's Marshall Delivery Group and is due for publication.</p>	<p><i>While the recommendation is reported as ongoing we note our serious concern that since 2014 only a single workshop (in 2016) has been held with a report from this provided to DoJ who have developed a response which has not yet been placed in the public domain. No substantive detail of work undertaken in this area is given and no report publication date is provided.</i></p> <p><i>Detail on the timeframe for bringing forward concrete changes and how the impact of this on CSE prosecutions will be monitored should be provided. Information on arrangements to ensure the experiences of child victims properly inform the process, which are referenced</i></p>

	Recommendation	Lead	Progress	NICCY Comments
				<p><i>in the first progress report, should also be given.</i></p> <p><i>Sir John Gillen has noted unacceptable delay in the implementation of this and related criminal justice recommendations. (2018 Preliminary report into the law and procedures in serious sexual offences in Northern Ireland, Sir John Gillen.)</i></p>
K10	The DOH should ensure that the forthcoming, planned review of SBNI should consider streamlining joint working arrangements to make them more realistic, efficient and effective.	DOH	See 1st, 2nd and 3rd composite progress reports for details.	<p><i>This recommendation is reported as completed. While we recognise that the Review of SBNI has been published, there is no update on the third progress report reference to recommendations which can be taken forward in the short term. There is also no detail provided on how Review recommendations have been mapped, including those that require a legislative solution. It is surprising that no reference is made to the draft Adoption and Children Bill consultation which included a chapter on changes regarding SBNI and the Children and Young People's Strategic Partnership.</i></p>

Recommendation		Lead	Progress	NICCY Comments
K11	The DOH should ensure that there are clear reporting pathways 24 hours a day, seven days a week, for reporting concerns about children and young people, including CSE, with appropriate feedback provided to the individual or agency making the report.	HSCB	Completed – see 1st composite report for details.	<p><i>This recommendation has been reported as complete since the first progress report in 2015 which referenced the regional out of hours social work service (RESWS) and the planned RQIA review of child protection arrangements which would consider the recommendation.</i></p> <p><i>While the RQIA Review published in May 2018 did note increased evidence of CSE awareness and risk assessments, which is very welcome, it does not appear to report specifically on this recommendation or assess reporting pathways and feedback. RQIA do however highlight that RESWS does not use the regional assessment tool (UNOCINI) and that it is important that information from out of hours is shared in a consistent manner with HSCTs (2018 Review of the Governance Arrangements for Child Protection in the HSC in Northern Ireland, RQIA).</i></p>
K12	The protocol for sharing information amongst agencies being developed by SBNI	SBNI	The protocol is being developed in parallel with the development of information sharing guidance by the Department of Health and it is intended to sequence publication of both documents. See S8 below.	<p><i>This recommendation was first reported on in the third progress report and is noted here as ongoing. NICCY draws attention to the framing of the recommendation which highlights that</i></p>

	Recommendation	Lead	Progress	NICCY Comments
	should be concluded as a matter of priority.			<i>the protocol should be developed as a matter of priority. We note serious concern that since the publication of the Inquiry report in 2014 this has not been achieved and no timeframe for completion is given.</i>
K13	SBNI and its member agencies should seek to ensure that there is delivery of professional training, both multi-agency and profession-specific, and that this is based upon a clear, agreed and shared definition of CSE.	SBNI	This recommendation has been completed and work is now on-going as part of normal business. Cooperating to Safeguard Children and Young People 2016' section 7.2.7 relates to the definition of CSE and this is referenced in the SBNI Policies and Procedures currently under development. It is also used in the planning and delivery of professional training. All of the SBNI Member agencies deliver training on both a multi-agency and profession specific basis.	<i>Further detail on the frequency and scope of training and attendee feedback on how it has improved single and multi-agency understanding of CSE and how responses to protect children and disrupt perpetrators have been strengthened would be useful.</i>
K14	The DOJ should lead on a project to examine legislative issues highlighted in this report and bring forward proposals for change. These include: a) Ensuring compliance with international standards by extending protection to children up	DOJ	Departmental Officials are engaging with relevant criminal justice organisations to assess these proposals for legislative change. The previous Justice Minister committed to a review of the law surrounding child sexual offences and exploitation. She answered an Assembly question in November 2016 when she confirmed that proposals arising from such a review would be subject to public consultation, which she planned to initiate by April 2017. This date has been deferred given recent political events and the absence of	<i>It is very disappointing that the recommendation on strengthening the law to better protect children from CSE has not yet resulted in concrete policy or legislative proposals and that no definitive timescale in which steps towards improved legislative will be taken is provided.</i> <i>It is now nearly two years since the collapse of the Northern Ireland</i>

Recommendation	Lead	Progress	NICCY Comments
<p>to the age of 18, specifically, the Child Abduction (Northern Ireland) Order 1985 and the Sexual Offences (Northern Ireland) Order 2008.</p> <p>b) Providing for a Recovery Order under the Child Abduction (Northern Ireland) Order 1985, on the model of that in section 69 of the Children (Northern Ireland) Order 1995.</p> <p>c) Replacing all references to child “prostitution” with “child sexual exploitation”.</p> <p>d) Extending the offence of “grooming” to include “enticing”.</p> <p>e) Reversing the rebuttable presumption in the Sexual Offences (Northern Ireland) Order 2008 in relation to “reasonable belief” as</p>		<p>Executive Ministers. On completion, the proposals will then be subject to the views of any incoming Justice Minister before publication.</p>	<p><i>Assembly and NICCY notes that this should not mean that work in this area fails to be progressed in some form.</i></p> <p><i>NICCY reiterates that similar recommendations have previously been made by other bodies, including the UN Committee on the Rights of the Child. We also note that the Department should consider its work in this area with renewed priority following the UK Government’s recent ratification of the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (the Lanzarote Convention). We understand that DoJ now intend to consult on this area and note this should be progressed with urgency.</i></p>

	Recommendation	Lead	Progress	NICCY Comments
	<p>regards the age of a child.</p> <p>f) Whether recent legislation in England and Wales relating to hotels, guest houses and bed and breakfast accommodation would be helpful in addressing CSE in Northern Ireland. These are contained in the Anti-Social Behaviour, Crime and Policing Act 2014.</p>			
K15	<p>The DOH should lead the development of a regional strategy to prevent, identify, disrupt and tackle CSE. It should involve DOJ and DE and should: a) be informed by the experiences and views of children, parents and carers; b) recognise parents and carers as partners in preventing and tackling CSE, unless there are</p>	DOH	<p>See the 3rd composite report for details of the current position relating to this recommendation.</p>	<p><i>The development of a regional strategy was a key recommendation of the Inquiry. The first progress report noted a draft strategy would be consulted on in June 2016 and published in June 2017. This has not happened and no clear commitment to a strategy being developed is given in this progress report. DoH had previously stated that the Strategy was to be brought forward by an implementation group which included DEL and DARD (now DfE and DAERA respectively) although there has</i></p>

Recommendation	Lead	Progress	NICCY Comments
<p>strong indications that they are involved or complicit; c) recognise the support and training needs of frontline workers in all agencies in relation to CSE; d) reflect the particular role of schools in raising awareness and identifying concerns about CSE; e) acknowledge the role of health workers in early intervention, prevention and in reporting CSE, which should be made more explicit in policies, guidance and training; f) recognise agencies operating in the vol (non-statutory) sector as equal and valued partners; g) equip communities with the information, support and confidence to identify and report concerns about CSE; h) link into and build upon,</p>			<p><i>been no further reporting by or reference to DfE and DAERA.</i></p> <p><i>Hyperlinks in the second progress report to mapping and assessment exercises on the need for a Strategy cited did not work and no further detail on this work has been given on this in the third or fourth progress reports.</i></p> <p><i>The third progress report states Departments have agreed to delay implementation until the end of implementation phase three (it is not noted when this is) when they will jointly assess any gaps and the need for a further strategic response. It is also noted the SBNI Education and Training Committee will address this section c) of the recommendation.</i></p> <p><i>NICCY again highlights that the 2016 HMIC report into PSNI effectiveness cited the lack of an overarching CSE strategy as a factor in inconsistent responses to missing children across HSCTs as different approaches were being developed in different areas. (2016 PEEL: Police effectiveness</i></p>

	Recommendation	Lead	Progress	NICCY Comments
	<p>existing work in relation to child trafficking as well as strategies tackling known vulnerabilities for CSE, such as alcohol, drugs (including legal highs), sexual health and domestic violence; i) explore the potential contribution to this issue of strengthening a statutory duty to co-operate among stakeholder agencies; and j) establish a process for promoting and monitoring the implementation of the recommendations of this report.</p>			<p><i>(vulnerability), HMIC). No information has been given to outline how Departments and statutory agencies have addressed this HMIC finding either through the development of a strategy or another mechanism which will ensure a high standard of regional consistency.</i></p>
K16	<p>The HSC Board should adopt a strategic approach to the provision of support services for those who have been subject to CSE, to ensure equality of access. This should build</p>	HSCB	<p>Completed – see the 1st, 2nd and 3rd composite reports for details.</p>	<p><i>While this recommendation is reported as complete we note that no data on service availability, demand or importantly waiting lists is given. No information is provided regarding specialist services, such as services for Separated Children, or measures that are in place to ensure young people are seen urgently as needed.</i></p>

Recommendation		Lead	Progress	NICCY Comments
	on current, good practice examples.			<i>We also note that no reference is made to the sustainability of services, including specialist services referenced in earlier reports, and highlight that no evaluation or feedback from children and young people or practitioners on how implementation has improved provision is included.</i>
K17	The HSC Board should ensure that accessible and appropriate support services are made available for adults who were abused as children.	HSCB	Completed – see progress for K16	<p><i>We note that no new update on how this work is being taken forward and no detail on whether specialist services are currently able to properly support victims of CSE at the point of need is given.</i></p> <p><i>It is important to clearly state that the Trauma Managed Care Network will be accessible to, and provide specialist support for adults who were abused as children.</i></p>
			Sample of supporting recommendations	
S5	The Department of Education should give guidance to schools on how they can provide flexible support sessions	DE	Completed – see the 1st, 2nd and 3rd composite reports for details.	<i>Revised Relationships and Sexuality Education (RSE) guidance was issued by CCEA in 2015. However, while the third progress report notes that the guidance highlights the need for explicit teaching of</i>

	Recommendation	Lead	Progress	NICCY Comments
	<p>about CSE that are accessible for parents of disabled children.</p>			<p><i>RSE for vulnerable groups, such as children with SEN, as well as the need for communication with parents and carers, this is not in the specific context of CSE.</i></p> <p><i>No detail has been given to indicate how the guidance has made a positive difference to the way in which schools are providing information and support to parents about CSE, such as, numbers of schools that have offered sessions, including for parents of disabled children.</i></p> <p><i>Tracking implementation of this recommendation is particularly important following the 2016 ETI report which highlighted the majority of schools reported teachers not being confident or being uncomfortable addressing the 'sensitive' aspects of RSE, including abuse. (2016 RSE in primary and Special Schools: Report of an evaluation, ETI).</i></p>

	Recommendation	Lead	Progress	NICCY Comments
S6	<p>The HSC Board should ensure that child protection issues are consistently and skilfully addressed in LAC and disability settings, where these are separate from specific child protection processes.</p>	HSCB	<p>There are two elements to this recommendation: 1, protecting children who are ‘looked after’; and 2, protecting children within a disability setting.</p> <p>The DOH is currently working with the HSCB to develop revised guidance to ensure that child protection issues are addressed within LAC settings. A final draft of the revised guidance has been prepared and is being taken through final approval processes.</p> <p>Work has been taken forward by the CSIB sub-group for children with disabilities in relation to the key issues arising from a QUB/CYPSP/SBNI scoping exercise. The group to date has completed work on developing consistent access criteria for children with disability services across the region (still in draft form) and it has reviewed the numbers of staff trained within its teams in joint protocol procedures. All trusts have worked together through this group to ensure that child protection issues are consistently addressed by the most skilful and relevant person for the child.</p> <p>The Trusts have all developed intellectual disability CAMHS/therapeutic support services for children with learning disability and challenging behaviour and are also all developing a range of shared care fostering placements. The group provided direct input into the updating of the SBNI child protection procedures as they pertained to children with disabilities – this will form part of</p>	<p><i>NICCY welcomes the progress made which means this recommendation is now reported as ongoing rather than not achieved as was previously the case.</i></p> <p><i>Further information on the timeframe for progressing the revised guidance relating to Looked After Children would be welcome as would detail on how evidence of effective implementation will be gathered.</i></p> <p><i>The referenced Scoping Study by QUB, SBNI and the Disability Network documents a range of concerns in the interface between disability and child protection and makes a number of useful recommendations. The information on areas of the report that have been taken forward is helpful but a timeframe for CSIB’s work on fully progressing this should be provided.</i></p> <p><i>In relation to the comments that all HSCTs have developed intellectual disability CAMHS services, HSCB will be aware of NICCY’s serious concerns that children with learning disabilities do not have equitable access to specialist</i></p>

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			<p>the second stage in the development of the new policies and procedures.</p>	<p><i>mental health services at the point of need, as evidenced in our ‘Still Waiting’ report. See section 5 of the report at: https://www.niccy.org/about-us/our-current-work/mental-health-review-still-waiting/still-waiting-a-rights-based-review-of-mental-health-services-and-support-for-children-and-young-people-in-northern-ireland/</i></p> <p><i>HSCB and HSCTs are also aware of our significant concerns about the availability of children’s access to a range of appropriate placement options, including shared care.</i></p> <p><i>We also note that the recommendation relates to assessment and decision making processes and are disappointed that clearer detail on how practice in these areas will be reviewed and reflected upon is not provided.</i></p>
S7	<p>The Department of Education should ensure that all young people can access more information and support on healthy relationships, including</p>	DE	<p>See the 3rd composite report.</p>	<p><i>We note that neither the publication of DE’s Circular 2015/22 nor CCEA’s 2015 RSE guidance which are both referenced in the third report in themselves provide assurance that action to implement this</i></p>

	Recommendation	Lead	Progress	NICCY Comments
	<p>LGBT young people. This could be included within the CCEA review of Relationships and Sexuality guidance materials</p>			<p><i>recommendation is supporting and improving practice across schools.</i></p> <p><i>Progress reports should outline the basis on which DE assesses that all young people can access more support on healthy relationships, particularly LGBT young people. DE will be aware of the importance of this given the 2017 research findings in which two thirds of LGBT young people reported sexual health education in their school was unhelpful or very unhelpful and focus group participants stated sexual health education ignored the needs of LGB&T young people or actively advocated against their interests.</i></p> <p><i>(2017 Post-Primary School Experiences of 16-21 year old people who are Lesbian, Gay, Bisexual and/or Transgender, PACEC). NICCY notes that a range of specialist organisations have expertise that can be drawn upon in relation to this recommendation.</i></p> <p><i>We also note that the third progress report stated DE was considering how to best disseminate healthy relationships messages across the youth sector and</i></p>

	Recommendation	Lead	Progress	NICCY Comments
				<p><i>that no update is provided on this although the recommendation is reported as completed.</i></p>
<p>S8</p>	<p>DOH in conjunction with DOJ should pursue an All-Ireland Information Sharing Agreements to achieve closer collaboration on CSE and related issues.</p>	<p>DOH</p>	<p>DoH Officials are chairing a short life working group with representation from HSCB, PP for Court HSCT, NICTS to revise the draft guidance <i>Northern Ireland Guide – Handling Of Cases Under The 1996 Hague Convention: A Guide For HSC Trusts</i> which was based on Department for Education in England guidance.</p> <p>An inter-jurisdictional protocol for the transfer of social care cases between Northern Ireland and the Republic of Ireland has been in operation since November 2011 and will remain in place until the revised guidance is ready for issue.</p> <p>A draft information sharing agreement between the PSNI and An Garda Siochana is currently with the Irish Attorney general for consideration.</p> <p>Consideration is being given to mechanisms to facilitate sharing of information between social care agencies and between justice agencies across both jurisdictions. These must dovetail with established internal (to each jurisdiction) information-sharing agreements between justice and social care agencies and with established international protocols.</p>	<p><i>The Independent Inquiry report highlighted that the 2011 protocol (designed for the transfer of cases when families move across the border and child protection and family support needs are already known) was limited in relation to information sharing regarding CSE.</i></p> <p><i>Reporting should identify timelines in which revised guidance will be published and information sharing agreements and mechanisms will be operational. Progress reports should identify whether initiatives to date are leading to closer collaboration on CSE in operational and frontline practice.</i></p> <p><i>Detail should be provided on the impact of Brexit on all-Ireland arrangements in relation to safeguarding, and CSE specifically. We note that work to implement this recommendation as well as key recommendations 14 and 15 should ensure that information for the purposes of safeguarding children is</i></p>

Recommendation		Lead	Progress	NICCY Comments
			PBNI continue to work with the Irish Probation Service (IPS) within the current information protocol regarding individuals convicted of sexual offences or individuals (also convicted) who are assessed as posing a risk of serious harm.	<i>effectively shared across all necessary jurisdictions.</i>
S13	The HSC Board should monitor the arrangements for private fostering to ensure that awareness of CSE is raised and to ensure identification of cases that have not been notified to the HSC Trusts.	HSCB	Completed - See 1st and 2nd composite reports.	<p><i>The 2015 DoH implementation plan stated that HSCTs would: identify a senior manager with responsibility for ensuring compliance with the range of duties relating to private fostering; include CSE in staff training in the context of private fostering; and that HSCB would consider additional measures to increase private fostering registration. While previous reports note that Circular CCPD 1/11 was re-issued and a leaflet was published, no detail is given on the impact of actions taken.</i></p> <p><i>For example, has there been an increase in registrations of private fostering, are staff more confident in identifying and responding to CSE risk and are statutory agencies confident that they are aware of the full scope of private fostering arrangements in Northern Ireland?</i></p>

	Recommendation	Lead	Progress	NICCY Comments
				<p><i>Earlier reports note that HSCT data on private fostering will be reported through the HSCB Delegated Statutory Functions reporting process but it is unclear that these reports continue to be available in the public domain.</i></p>
S14	<p>DOH should ensure the involvement of young people in any future review of the Regional Guidance on Police Involvement in Residential Units/ safeguarding of Children Missing from Home and Foster Care.</p>	HSCB	<p>Completed – see the 1st composite report.</p>	<p><i>As NICCY has previously stated, a clear commitment to periodic review of the Guidance and the involvement of children and young people in this should be given. This is particularly important following the concerns highlighted by HMIC regarding inconsistency in police risk assessments of missing children known to be at risk of CSE (2016 PEEL: Police effectiveness (vulnerability), HMIC).</i></p> <p><i>We are aware of work currently being undertaken by PSNI and HSCB on the definition of missing and statutory agency responses to missing episodes and highlight the need to involve children in these review processes.</i></p>
S16	<p>The HSC Board Strategic Action Plan – Children Missing from</p>	HSCB	<p>Completed – see the 1st composite report.</p>	<p><i>The DoH implementation plan noted that the Missing Action Plan would be</i></p>

	Recommendation	Lead	Progress	NICCY Comments
	Home or Care should be revised and implemented as part of the strategic overview of CSE.			<p><i>submitted to CSIB for sign off in May 2015.</i></p> <p><i>NICCY is aware of the HSCB/PSNI 2018 Joint Strategic Action Plan for Children Missing from Residential Care and notes with concern that this does not address children missing from home. We seek clarification as to whether this is the document referenced in the DoH implementation plan.</i></p> <p><i>NICCY has previously expressed concern that the scope of regional guidance and reviews should not be restricted to children in care. We highlight that strategic responses to vulnerable young people should be based on the rights, best interests and needs of the individual child, not solely their care status.</i></p>
S17	Police evidence about the circumstances in which a child was found after going missing or putting themselves at risk can be vital to protection arrangements.	PSNI	Completed – see the 1st, 2nd and 3rd composite reports.	<i>The first progress report notes the 2015 HSCB/PSNI Missing Children Protocol and the issuing of PSNI service instructions but no further detail of the impact of this, such as, whether improvements in recording and sharing information or increases in disruption or</i>

	Recommendation	Lead	Progress	NICCY Comments
	<p>PSNI should review current processes to ensure that in all circumstances, information is recorded and transmitted appropriately, both internally and to partner agencies.</p>			<p><i>investigation of CSE has been achieved have been provided in subsequent reports.</i></p> <p><i>Reference is also made to the PSNI restructure into PPU's but we again note that in 2016 HMIC found an inconsistent police response to missing children. It is also of note that CJI have recently highlighted a range of challenges regarding resourcing within PSNI public protection. (2018 Without Witness: A thematic inspection of sexual violence and abuse cases by the criminal justice system in Northern Ireland, CJI).</i></p> <p><i>It is concerning that this recommendation is reported as completed without evidence of change being achieved.</i></p>
S18	<p>HSC Trusts should ensure that when a child returns after being missing, he or she is offered an interview with an independent person in line with regional guidance</p>	HSCB	<p>Completed – see the 1st composite report.</p>	<p><i>NICCY remains concerned that there may be inconsistencies in practice regarding return interviews as well as safe and well checks. We also reiterate that the 2016 HMIC inspection highlighted there was no consistent process to provide police with information from return interviews.</i></p>

	Recommendation	Lead	Progress	NICCY Comments
				<p><i>Progress reports should include detail which demonstrates that return interviews are undertaken and that the HMIC finding has been addressed.</i></p>
S22	<p>The HSC Board, in conjunction with the HSC trusts, should assess the appropriateness of existing unregulated placements to ensure that the assessed needs of young people in these placements are being met.</p>	HSCB	<p>Completed - see the 1st and 2nd composite reports.</p>	<p><i>Detail of the assessment exercise noted in the second progress report and how this has engaged providers, including those involved in joint commissioning, RQIA and young people should be given.</i></p> <p><i>NICCY notes particular concerns regarding the use of unregulated private placements outside of the scope of supported and joint commissioned accommodation and requests assurances as to the rigour of procedures in place to safeguard children's welfare in such circumstances. While the second progress report highlighted that HSCT Directors had provided the Board with assurances that appropriate arrangements were in place (including CSE risk assessments), following legal proceedings and NICCY's intervention in this case we note the importance of HSCB providing more robust assurance that the range of issues outlined in the judgement have been</i></p>

	Recommendation	Lead	Progress	NICCY Comments
				<p>properly addressed [2018] NIQB 34. Available at: https://judiciaryni.uk/judicial-decisions/2018-niqb-34</p>
S25	HSC Trusts should endeavour to provide stability by minimising the movement of both children and staff throughout residential and foster care settings.	HSCB	Completed - see 1st and 2nd composite reports for detail.	<p><i>NICCY previously noted concern that the ten pages of information provided by DoH in the second progress report on this recommendation gave only general information on outlined plans and agreed positions and did not demonstrate how concrete change in placement stability had been achieved. It is disappointing that no update or further detail has been given on this recommendation.</i></p> <p><i>SBNI's Thematic Review of CSE also referenced the importance of stability and of children's relationships with dependable adults as a protective factor and noted the need to enhance relationship based practice. (2015 Thematic Review of CSE, SBNI).</i></p> <p><i>Recommendations should not be assessed as completed if detail of impact and outcomes (including in this case children's views on placement stability) cannot be provided.</i></p>

	Recommendation	Lead	Progress	NICCY Comments
S30	The Department of Education should work with other departments to ensure that there are appropriate safeguarding arrangements for children in all non-statutory education settings.	DE	<p>Complete.</p> <p>The Department works on an on-going basis with other Departments/agencies in developing guidance for all educational providers as and when required.</p> <p>The Department has also received assurances regarding CSE training for staff in Sure Start Settings; Pre-school settings; other early years settings funded by the Early Years Fund; Youth Services and Education Otherwise Than At School.</p>	<p><i>NICCY notes that this recommendation applies to safeguarding children in all non-statutory education settings. As we have previously stated, earlier progress reports reference that EA will consider safeguarding in new procedures being developed for Elective Home Education but, while we understand work on procedures is being developed, no update is provided in progress reports and no indication as to how EA and Departments will ensure that robust safeguarding arrangements are in place for this group of children is given. No detail is provided on how action taken in any setting has improved safeguarding arrangements.</i></p> <p><i>We seek particular assurance about how DE has assessed that this recommendation is completed across non-statutory settings including Home Education and also independent schools as a matter of urgency.</i></p>
S31	Schools should ensure that Relationships and Sexuality Education is	Schools	Complete – see 1 st composite progress report.	<i>While in the first progress report DE highlighted that CCEA published revised RSE guidance in 2015 we again note</i>

Recommendation		Lead	Progress	NICCY Comments
	delivered by people with the skills and confidence to do so.			<p><i>that this does not deliver the recommendation or demonstrate how DE and schools are ensuring RSE is delivered by those with the skills and confidence to do so.</i></p> <p><i>This is particularly concerning given that in 2016 ETI highlighted concerns that teachers were not being confident or being uncomfortable addressing the 'sensitive' aspects of RSE and noted the need for training on this (2016 RSE in primary and Special Schools: Report of an evaluation, ETI).</i></p>
S40	The Department of Education should ensure that youth workers, whether paid or voluntary, should receive training to help them to inform and support young people, who may be at risk of CSE, and to identify and report safeguarding issues appropriately.	DE	<p>Complete.</p> <p>An Interim Child Protection and Safeguarding Policy was approved by the EA in January 2016. The policy applies to all EA services including the youth service.</p> <p>Youth workers' child protection training now comes within the remit of the Education Authority's Child Protection Support Service (CPSS).</p>	<p><i>It is positive that DE has clarified that youthwork child protection training sits with CPSS but no information is given as to how DE has assured that access to CPSS training has been effective. This may include information on participation in training, youth worker feedback and monitoring increases in the youth service seeking advice on or referring cases where young people may be subject to CSE.</i></p>

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S43	PSNI and criminal justice partners in the Prosecution Service and Court Service should continue to develop their approach to responding to victims of CSE in a way that treats them fairly and sensitively and avoids blaming them for offending behaviour associated with their abuse. This involves attitude, not just policy or process.	DOJ	Completed – refer to 3 rd composite report.	<p><i>The detail in the third progress report on PSNI training on the Missing Children Protocol and e-learning is welcome but would be strengthened by inclusion of evaluation from participants and feedback from children and young people on their contact with and treatment by PSNI. Further detail on how these actions and those taken by NICTS and PPS (noted in earlier progress reports) are improving how the criminal justice system responds to victims of CSE should be given.</i></p> <p><i>NICCY notes with concern that the information provided does not indicate that there has been a systemic change in the treatment of victims during investigations and judicial proceedings. In our advice to the current review of arrangements to deliver justice in serious sexual offences cases we recommend a new child centred justice model. DoJ and criminal justice agencies should properly consider this proposal in order to effectively implement this and a number of other Inquiry recommendations.</i></p> <p><i>Available at:</i></p>

	Recommendation	Lead	Progress	NICCY Comments
				https://www.niccy.org/publications/2018/september/07/review-of-sexual-offences-cases/
S46	<p>Awareness-raising about the dynamics of child abuse and CSE in particular should be available for all legal personnel and should be mandatory for all legal professionals dealing with child abuse cases. This should be made the responsibility of the PPS for its own legal staff, the Northern Ireland Bar for its staff and the Judicial Studies Board for Judges.</p>	<p>PPS DOJ NI Bar</p>	<p>Public Prosecution Service The Public Prosecution has established a Serious Crime Unit (SCU) to deal with all sexual offences cases including cases involving Child Sexual Exploitation. This Unit became operational on 4 January 2016 and is staffed by 10 experienced Senior Public Prosecutors and is headed by an Assistant Director who reports directly to the Senior Assistant Director. All Prosecutors in the SCU have received training on sexual offences including sexual offences against children as well as specific training on Child Sexual Exploitation which was provided by Barnardo's which included potential indicators of CSE and the particular needs of children who have been subjected to or are experiencing CSE.</p> <p>Judicial Studies Board The Judicial Studies Board have issued a notice to all members of the Judiciary informing them of the recommendation to raise awareness of the issue. JSB representatives plan to attend and continue to distribute further insight and learning points from CSE related events.</p> <p>It is the Judicial Studies Board's continued intention to attend - and distribute further insight and learning points</p>	<p><i>It is helpful that information has been provided by the range of agencies across the third and fourth progress reports. However, the impact of awareness raising and training on the confidence and skills of legal personnel, the management of cases and the experiences of victims and witnesses should be monitored as we have noted previously.</i></p> <p><i>In our advice to the current Gillen Review into the law and procedures in serious sexual offences we recommend that expert input on the dynamics of abuse is provided at the beginning of the trial process. Available at:</i> https://www.niccy.org/publications/2018/september/07/review-of-sexual-offences-cases/</p> <p><i>The preliminary report of the Gillen Review has made a number of important recommendations to improve awareness raising in this area. (2018 Preliminary</i></p>

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			<p>from - CSE related events. JSB is purely a training body and its capacity to measure outcomes for court users – and in particular children who have been victims of CSE – is limited. However we do seek to measure the effectiveness of any JSB training provided by means of evaluation questionnaires and we ask for a training report following attendance by one or more of our judges at any external training event.</p> <p>Bar of Northern Ireland</p> <p>The Bar of Northern Ireland has delivered a programme of specialist training targeting publicly funded barristers which includes child abuse and CSE as well as vulnerable witnesses, violence against women and court users with communications needs. One example of this is the Bar’s participation in a European training project in January 2018 with the Council of Bars and Law Societies of Europe (CCBE) focusing on the Training of Lawyers on the Law regarding Violence Against Women.</p> <p>The Bar of Northern Ireland also continues to provide regular opportunities for members to attend continued professional development (CPD) sessions/events on discrete areas such as child sexual exploitation, vulnerable witnesses and child protection. Please note that barristers are not ‘staff’ of the Bar of Northern Ireland but rather self-employed individuals, therefore, mandatory training is not possible.</p>	<p><i>report into the law and procedures in serious sexual offences in Northern Ireland, Sir John Gillen.)</i></p>

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S47	<p>While we acknowledge the work already undertaken by the Department of Justice in order to avoid delay, robust case management is necessary. The DOJ should ensure that both statutory case management and statutory time limits are introduced in Northern Ireland. Both have already been the subject of clear recommendations by the Criminal Justice Inspection in Northern Ireland.</p>	DOJ	<p>The Justice (Northern Ireland) Act 2015 received Royal Assent on 24 July 2015 and the Department will make regulations which will impose duties on the court, prosecution and defence.</p> <p>The Statutory Case Management regulations have been drafted and revised to reflect input from delivery partners. A consultation with OLCJ, PPS, Law Society and the Bar Council is required by statute and plans also include a wider consultation with other stakeholders. Implementation of statutory case management is planned for March 2018.</p> <p>In the new mandate the Minister was still considering her position with regard to STLs when the Assembly was dissolved. The Justice committee agreed during an oral evidence session in the last mandate that it was timely to revisit performance monitoring and reporting arrangements across the three court tiers including the Youth Court. A baseline dataset has been developed with key stages in the criminal justice process defined to enable clear and robust measuring and monitoring of time taken to process criminal cases.</p>	<p><i>We note the third and fourth progress reports state that statutory case management is planned for September 2017 and then March 2018 and request a further update on this. The fourth progress report does not confirm if the planned May/June 2017 consultation with OLCJ, PPS, Law Society and Bar Council noted in the third report has been completed. We also note that progress on this recommendation relates directly to key recommendation 9.</i></p> <p><i>In relation to statutory time limits it is disappointing that meaningful progress has not been made in this area and that no update is given on the Youth Court proposals to improve processing times discussed in the second progress report.</i></p> <p><i>NICCY highlights that CJI has also previously made recommendations regarding statutory case management and time limits and notes serious concern that these have still not been fully addressed. (2010 Avoidable Delay, CJINI).</i></p>

	Recommendation	Lead	Progress	NICCY Comments
				<p><i>Concerns regarding delay in sexual offences cases have been further highlighted by the 2018 CJI inspection of sexual violence and abuse cases and the Gillen Review preliminary report. In particular, the Gillen Review draws attention to the concerning fact the cases involving sexual offences against children are subject to the longest delays and that this has now increased significantly to an average of 986 days between reporting to the case being dealt with at court.</i></p>
S50	<p>PSNI, in its review and development of the Public Protection Units, should move to develop perpetrator profiling and a greater focus on perpetrators.</p>	PSNI	<p>Complete – see 1st composite report for details.</p> <p>The review and restructuring of public protection, within the service, has been completed, taking into consideration matters concerning staff, processes, technology, facilities and, importantly, victims/service users, as well as other key stakeholders. The aim was to better align resources to organisational objectives, including the safeguarding children and tackling child sexual exploitation. This will improve performance management as well as better structured and improved communication between the PSNI and external stakeholders, and ultimately ensure better protection for members of the public.</p>	<p><i>The importance of a shift in focus to greater perpetrator profiling and network analysis was highlighted by both the Independent Inquiry and also SBNI’s 2015 Thematic Review of CSE. While the information on structural realignment is useful it does not address how the restructure of services and units has ensured a greater focus on perpetrator profiling. For example, this may include information on dedicated specialist staffing, increases in active CSE disruption and improved progression of cases beyond the stage of reported offences to PSNI. As previously noted,</i></p>

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			<p>Public Protection Units have been aligned to the 5 Health & Social Care Trusts, under one single command structure, within Crime Operations Department. Public Protection Branch, as it is known, is led by a Detective Chief Superintendent. The Branch incorporates, as well, the work of the Child Internet Protection Team, Rape Crime Units, and Public Protection Arrangements for Northern Ireland (PPANI). Policy Leads have been brought under this same command structure to align practice and policy closer together. One regional Central Referral Unit (CRU) has also been created to, amongst other matters, provide a consistent and robust approach to the management of referrals and information i.e. those relating to child safeguarding and domestic abuse, as well as managing CSE related risk assessments.</p> <p>As part of the new Public Protection Structures, Daily and Monthly Management Meetings are held and focus, amongst other matters, on CSE offenders. In addition to the above ongoing work, work continues in developing and updating the profiling of CSE in Northern Ireland</p>	<p><i>resourcing issues have been highlighted by CJI's 2018 inspection of sexual violence and abuse cases. (2018 Without Witness: A thematic inspection of sexual violence and abuse cases by the criminal justice system in Northern Ireland, CJI).</i></p> <p><i>We again raise concern that recommendations are being assessed as completed without verification of effective implementation.</i></p>
S52	DOH should ensure that the revision of Circular HSS CC 3/96 (Revised), Sharing to Safeguard: Information Sharing about Individuals who	DOH	The information sharing guidance for child protection purposes, which will replace Circular 3/96, has been drafted. Preparations are being made to issue for public consultation.	<i>DoH's first progress report stated the Circular was being revised and guidance would be consulted in autumn 2015 and published March 2016. The second progress report stated the Circular will be replaced with guidance which will be</i>

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	<p>may pose a Risk to Children, is accompanied by clear guidance to workers that will give them the confidence to act appropriately.</p>			<p><i>consulted on in autumn 2016 and the fourth progress report states preparations are being made for consultation. The fourth report covers the period up to November 2017 and NICCY is not aware of any consultation to date.</i></p> <p><i>We reiterate that the Inquiry report highlighted that this recommendation addresses information sharing which can pre-empt children's exposure to danger and that the current situation leaves frontline staff in a difficult position. This should be urgently addressed.</i></p>
S54	<p>The DOH, supported by DOJ, should ensure that existing out of hours services across the health, social care and police sectors, are co-ordinated and strengthened. They should enable frontline staff from all sectors, as well as communities and concerned individuals, to access relevant information and skilled</p>	HSCB	<p>See 1st and 2nd composite reports.</p>	<p><i>There are a number of Health and Justice recommendations such as this which relate to operational practice, which are reported as completed but which concerns are highlighted by the 2016 HMIC inspection. These include different approaches being taken across different HSCT areas, inconsistent missing children risk assessments, inconsistent sharing of information from return interviews and the need for specialist training. While there has been structural change, it is not clear that this has resulted in improvements in</i></p>

	Recommendation	Lead	Progress	NICCY Comments
	<p>advice about safeguarding matters relating to children, including CSE.</p>			<p><i>safeguarding outcomes for children.</i></p> <p><i>This raises questions about the basis on which DoH in the second progress report states that action taken “now ensures both agencies [social services and police] have dedicated experienced personnel available at the front door to deal with all safeguarding matters including CSE”.</i></p> <p><i>It is of serious concern that no update on how issues identified by HMIC have been addressed in the latest progress reports.</i></p>