

# Complex (Organised and Multiple) Abuse Policy

Social Services and Well-being (Wales) Act 2014

Cardiff Council  
Children and Young People  
Social Services



A policy in relation to complex (organised or multiple) abuse

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*Produced with thanks to Brighton & Hove, East Sussex and West Sussex Safeguarding Children Boards.*

*Cardiff Children’s Services are committed to the United Convention on the Rights of the Child, ensuring that all young people and staff within our service are treated in a non-discriminatory manner, with equal respect, acceptance, and opportunities to engage, develop and achieve. We all have an important role to play in ensuring the service carries out this commitment. Diversity is about valuing the differences that people bring with them. This definition leads on from that of equality, emphasising the value of different cultures, backgrounds, and experiences. Recognising diversity allows us all to respect and learn from each other, embracing difference and the fact that we are all unique in our own way.*

## 1. Introduction

This policy sets out the responsibilities of Cardiff Council concerning complex (organised and multiple) abuse cases involving children and young people.

Details of practice and specific processes are to be found in the authority's Procedure documents, which sit underneath this Policy. This policy **must** always be read in conjunction with the Social Services and Well-being (Wales) Act 2014 (henceforth the Act), associated Regulations and Codes of Practice.

## 2. Legislative Context – Summary

The Social Services and Well-being (Wales) Act 2014 (henceforth 'the Act') is the legal framework that brings together and modernises social services law in Wales.

This policy and its underlying procedures are written with particular reference to the following documents, which, in addition to the Act itself, should be the principle points of reference for those in need of further information:

The Act:	<a href="#">The Social Services and Well-being (Wales) Act 2014</a>
Other legislation:	<a href="#">Children Act 1989</a> <a href="#">Children Act 2004</a> <a href="#">Child and Family Act 2014</a> <a href="#">Housing (Wales) Act 2014</a> <a href="#">Mental Capacity Act 2005</a> <a href="#">United Nations Convention on the Rights of the Child (UNCRC)</a> <a href="#">Information about the UNCRC and the Children's Rights Scheme</a> <a href="#">United Nations Convention on the Rights of Disabled People</a> <a href="#">Human Rights Act 1998</a>

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	<a href="#">Working Together to Safeguard People – Individual children at risk</a>  <a href="#">Wales Safeguarding Procedures 2019</a>
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This policy must also be read in conjunction with the following:

Cardiff Council and the Vale of Glamorgan Council:	Information, Advice and Assistance Policy
	Advocacy Regional Policy
	Assessment and Eligibility Regional Policy
	Supporting Young Carers Regional Policy
	Supporting Adult Carers Regional Policy
	Undertaking Joint Assessments with Carers Regional Policy
	Secure Estate Regional Policy
	Ordinary Residence Regional Policy
	Planning and Promoting Preventative Services Regional Policy
	Community Engagement and Co-Production Regional Policy
	Safeguarding Regional Policy

### 3. Principles

The policy promotes better integration, and improved collaboration within and between agencies, providing a uniform and consistent approach that promotes children and young people’s safety and provides better support services.

Cases of organised abuse are often highly complex because of the number of children involved, the very serious nature of the allegations of abuse, the need for therapeutic input and the complex and time consuming nature of any consequent legal proceedings. Each investigation is different and complex abuse may occur in day care, in families and in other provisions such as youth services, sports clubs and voluntary groups. The emergence of cases of children being abused by the use of the Internet is also a form of complex abuse - *see also [Information Communication Technology Procedure](#)*.

Complex abuse investigations require thorough planning and may require the formation of dedicated teams of professionals from both the Police and Children's Social Care for the purpose of the investigation. It is recognised those who commit sex offences against children often operate across geographical and operational

boundaries and the procedure reflects the possible involvement of more than one local authority - see *Crossing Geographical and Operational Boundaries* below.

Where an allegation involves a post holder who has a specified role within these procedures, the referral must be reported to the Assistant Director.

In all investigations of organised abuse, it is essential that staff involved maintain a high level of confidentiality in relation to the information in their possession without jeopardising the investigation or the welfare of the children involved.

The protection of any children identified as being at risk of harm remains paramount, but the needs of the alleged offender should be treated with sensitivity and the investigation should aim to minimise the disruption and damage to the alleged offender's private and professional life.

Subsequent information generated throughout the investigation should only be shared on a 'need to know' basis.

This policy must be implemented in conjunction with the procedures on allegations against carers, staff, and volunteers where appropriate including allegations against professionals (see [Wales Safeguarding Procedures 2019 - Safeguarding Allegations/ Concerns about Practitioners and Those in Positions of Trust](#)).

#### 4. Summary of Key Duties and Requirements

**Definition** - Complex (organised or multiple) abuse may be defined as abuse involving one or more abusers and number of children (related or non-related).

The abusers concerned may be acting in concert to abuse a child or children, or may be acting in isolation. One or more of the adults involved may be using an institutional framework or position of authority to recruit children for abuse.

It reflects, to a greater or lesser extent, an element of organisation on the part of the adult(s) involved and may involve:

- Aspects of ritual to aid or conceal the abuse of children;
- Child Sexual Abuse networks where adults plan and develop social contacts with children for the purpose of gaining access to them in order to abuse them;
- Abusive images of children or abuse of children through sexual exploitation;
- Abuse in residential homes, boarding schools or other institutions;

- Adult(s) who seek contact with children for improper reasons through leisure or welfare organisations.

Complex abuse investigations will encompass not only the reporting of current abuse on children, but also the reporting of childhood abuse by adults, commonly referred to as historical abuse.

This policy also reflects that fact that whilst some investigations fall within the definition of complex abuse, they are not of the same scale or complexity as some of the large investigations in residential settings and children's homes that originally led to the production of this procedure.

Consequently some investigations may be defined as 'complicated' rather than 'complex'. In general terms these will be cases where agencies will need to work closely together, probably as part of a specialist team for the investigation under the direction of an Operational Complex (Organised and Multiple) Abuse Management Group (OCAMG), but not requiring the management and resources that would necessitate an Assistant Director or Director.

Examples of such cases would be where there are perhaps one or two abusers, and the number of known or potential victims are such that local teams can resource any response.

Any decision relating to whether a case is complicated or not will be made at the scoping meeting.

**Response** - Where there is a suspicion of complex abuse, the social / duty worker or police officer receiving the referral should immediately inform their line manager. Further advice is available from second tier managers. If managers agree that the referral constitutes a complex abuse allegation, the senior child protection manager and the detective chief inspector should be informed and consulted.

Investigations of complex abuse will be carried out under the auspices of the safeguarding partnership, which should be kept informed of its progress. The [Sequence of Events Flowchart](#) describes the sequence of events in responding to concerns about potential complex abuse.

**Scoping Strategy Meeting** - In order to assist the decision whether a complex abuse investigation is commenced, there should be a 'scoping' meeting involving the:

- Assistant Director

- Safeguarding OM and other relevant OMs
- Police detective chief inspector, Safeguarding Investigations Unit, or their nominee
- Operational managers from any other agency with information to assist in determining the scale of the enquiry, including the referring agency.

The meeting needs to take account of the likely impact on the victim(s), the suspected offender(s) and the community in deciding whether the investigation or any course of action, is proportionate to the aim. Factors to be considered include the:

- Extent or seriousness of the abuse (potential and actual numbers involved; the complexity of the circumstances; seriousness of injury or abuse; strength of public concern / feeling; the affect upon the community);
- Context in which the abuse occurred (degree of organisation; ritual; paedophile ring; access to children; employer / volunteer; school, nursery or other institution).

The scoping meeting must:

- Assess the information known to date;
- Decide what further information is required at this stage;
- Arrange for its gathering;
- Establish whether, and to what extent, complex abuse has been uncovered;
- Undertake an initial mapping exercise to determine the scale of the investigation and possible individuals implicated;
- Consider any immediate protective action required;
- Consider a plan for the investigation to be presented to the Strategic Management Group, including resource implications, if a complex investigation is initiated.

If the meeting decides that the case is likely to be sufficiently complex and resource intensive, then a full meeting of the Strategic Complex (Organised and Multiple) Abuse Management Group (SCAMG) should be convened.

If the meeting decides the case does not meet this threshold but does need a specific and focused operational response, an OCAMG should be convened, overseen by an Operational Manager, to identify and deploy the necessary resources to manage and complete any resulting investigation.

If, after further enquiries are made, it becomes clear that the situation is more complex, the scoping meeting should be re-convened and consideration given to defining the investigation as complex and convening a Strategic Complex

(Organised and Multiple) Abuse Management Group (SCAMG). [See Sequence of Events Flowchart](#).

If the case does not meet this threshold, then the investigation will be managed under the normal arrangements for Section 47 Enquiries (see [Wales Safeguarding Procedures 2019 - S47 enquiries: key considerations](#)). Where the extent of the complexity is unclear, there should be a further scoping meeting arranged to review the progress of the case, including DCI / AD / OM.

If, after further enquiries are made, it becomes clear that the situation is more complex, the scoping meeting should be re-convened.

**Professionals who need to be Informed** - Once the decision has been taken at the scoping meeting to initiate a complex investigation, the lead officer for Children's Social Care must be informed. (S)he must inform the Safeguarding Manager, the Director of Children's Services, head of the media / press office and senior managers of relevant agencies e.g. designated child protection professionals and legal services.

**Strategic Complex (Organised and Multiple) Abuse Management Group (SCAMG)** - To ensure a coordinated response, a Strategic Complex Organised and Multiple Abuse Management Group meeting, is chaired by either Children's Social Care or the Police, must be convened as early as possible. The agency initiating the meeting will provide the administrative support.

The membership of the SCAMG should comprise senior staff able to commit resources and will normally include the following:

- Lead officer for Children's Social Care or nominee;
- Assistant Chief Police Officer or nominee;
- Police senior investigating officer (SIO);
- Senior child protection manager or nominee;
- Senior legal adviser (local authority);
- Crown Prosecution Service;
- Assistant Director, Education or nominee;
- Senior health representative;
- Press officer;

Other individuals and agencies as appropriate.

Line managers of any staff implicated in the allegations of abuse must not be included in the SCAMG or the investigation team.

The terms of reference of the SCAMG should be recorded at the first meeting. All subsequent meetings held in accordance with this procedure must be recorded, the minutes classified as 'confidential' and all copies individually numbered. Any copying of minutes should be agreed with the chair.

The minutes should be arranged in the following format:

- Time, date, location of the meeting;
- Persons present;
- Apologies;
- Details of all individuals subject of the enquiry (genogram);
- Facts and circumstances known to date;
- Identified actions;
- Parameters of investigation;
- Terms of reference;
- Resources and management issues;
- Media issues;
- Miscellaneous;
- Exit strategy;
- Date of next meeting.

Decisions and explanatory reasoning should be recorded in the policy book, a document used by the senior investigating officer to record strategic and tactical decisions, who should also ensure the production of an action list for subsequent monitoring purposes.

The meeting must consider a wide range of issues and agree a plan that includes:

- A decision on the scale of the investigation and the staff required for a Joint Investigation Management Group (see Investigation Management Group below);
- The focus of the investigation: protection versus prosecution and what will and what will not be investigated;
- Any cross boundary issues and planning of appropriate liaison and sharing of resources;
- Identification of staff to manage the investigative process (usually the Safeguarding Investigations Unit DI and social work service / operational manager);
- Identification of sufficient trained staff for the investigation (see below);
- Organisation of adequate accommodation including a dedicated major incident room and facilities for interviewing and recording interviews;
- Arrangements for medical staff to conduct assessments;
- Arrangements for sufficient administrative staff and information technology resources to support the investigation;

- Proper legal advice including consultation with the Crown Prosecution Service, litigation and any other legal implications;
- Sufficient resources to ensure that children are protected from further abuse and that their welfare remains paramount (this should include appropriate foster, day-care or residential placements, medical, therapeutic, educational and practical services);
- Victim care;
- Child witness support, if relevant;
- Sufficient support, supervision and de-briefing of staff involved;
- Availability of expert advice where necessary;
- Liaison arrangements for inter-agency working;
- Time scales for the stages of the investigation;
- Allocation of specific tasks to personnel involved in the investigation together with line management responsibilities;
- Management of public relations and media interest in the case;
- Management of political arena;
- Confidentiality / need to know arrangements;
- Disclosure policy / information sharing;
- Professional association interest (e.g. Trades Unions);
- Free phone application - helpline for victims / information line;
- Issues around financial compensation for victims;
- Exit strategy;
- Safety / security of records and appointment of disclosure officer.

The SCAMG must ensure that any current risks to children are acted upon immediately, whenever they emerge during the investigation the AD / Senior Manager must make arrangements to convene the SCAMG regularly during the investigation to:

- Monitor the progress, quality and integrity of the investigation;
- Review risk indicators for the children involved;
- Consider resource requirements;
- Consider the appropriate timing of the termination of the investigation;
- Plan a de-brief meeting with the investigation management group to identify lessons learnt.

The SCAMG should remain in existence at least until the Crown Prosecution Service has made a decision about the alleged perpetrators.

The SCAMG must inform the regional safeguarding board partnership of the investigation and consideration given to the need for a child practice review.

### **Operational Complex (Organised and Multiple) Abuse Management Group**

**OCAMG** - This group led by the Assistant Director, should include representatives of Children's Social Care, education, health and local authority legal services. Other agencies should be invited as appropriate.

The role of this group will vary, but should include:

- A forum for the exchange of information, tactics and strategy, and to monitor the progress of the investigation;
- Ensuring consistent strategy for interviewing victims;
- Updating the SCAMG of the progress of the investigation;
- Updating the SCAMG on any resource shortages;
- Ensuring consistent support for victims and their families;
- Maintaining support for investigation team staff;
- Sharing information with agencies not represented on the SCAMG
- Ensuring compliance by the investigation team of policy and parameters set with regard to information sharing and confidentiality;
- Ensuring cross-flow of intelligence between agencies and the police major incident room;
- Setting policy.

**Investigation Team** - The SCAMG should identify individuals within and outside their organisation with the required expertise. This may include experience of investigating allegations of abuse, compiling profiles, understanding methods of abusers, child protection processes, disciplinary proceedings and working with victims, survivors and their families.

In selecting staff, consideration should be given to requirements arising from the individual needs of the relevant child(ren) - e.g. gender, culture, race, language, and where relevant, disability.

The team members must be trustworthy and display sensitivity, honesty, empathy and personal maturity. They must all be wholly independent from any of the parties that are the subjects of the investigation.

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Consideration of personnel seconded to the Investigation Team should be dedicated to the investigation and have no other responsibility.

The location of the team must take account, both geographically and organisationally, of the need to maintain confidentiality, especially crucial where the investigation concerns staff or carers.

Appropriate facilities must be available for video interviews and paediatric assessment.

Administrative support, information technology and accommodation requirements must be addressed at the outset, including the storage of confidential records.

**Access to Records** - One of the most difficult issues in complex abuse investigations relates to the tracing, use, management and disclosure of documentary information relevant to the investigation. The Investigation Team should consider what information is required and where it is likely to be, and take immediate steps to secure it within each agency.

A vast range of documentary information will exist on personal files, personnel files, e-mails, general establishment records and registers. Clear protocols and procedures for investigative access to this material will need to be established at an early stage.

Where vital information may have been lost, damaged or destroyed over a period of time, consideration should be given to the establishment of a database containing details of known or potential witnesses and victims.

**Information Sharing** - Complex abuse investigations rely critically on sensitive or highly confidential information being made available, including any information known about alleged perpetrators identified in the investigation.

The principles set out in the [Wales Safeguarding Procedures 2019](#) and [A Practitioner's Guide. Basic Legal Principles National Independent Safeguarding Board Wales 2019](#)) should be applied to all complex abuse investigations and team members should be familiar with these provisions.

The need to maintain the integrity of shared information is vital, and all investigative staff must be aware and comply with the principle of a 'need to know basis'. Consideration should be given to the use of confidentiality agreements with regard to individuals employed to undertake the investigation. In addition to the issues regarding access to files and information sharing, consideration must be given for the need to share information about any known or suspected offender identified in the investigation.

Whenever a statement of complaint is received in respect of an alleged perpetrator, a risk assessment must be immediately undertaken with regard to what current risk that person may pose to other young children.

Members of the Investigation Team should not undertake this task, but ensure that the appropriate information is shared with the multi-agency risk panel situated

in the area where it is believed the perpetrator is currently residing ([see South Wales Police Multi-Agency Public Protection Arrangements - MAPPA](#)).

**Crossing Geographical and Operational Boundaries** - It may be recognised at the outset, or during the investigation, that there are suspected or potential victims in more than one geographical area.

At the outset, the responsibility for managing the investigation lies with Children's Social Care where the abuse is alleged to have occurred/ where the alleged perpetrator(s) are alleged to operate.

Once it is recognised that there are suspected or potential victims in other areas a joint approach should be made by the SCAMG to the appropriate police and Children's Social Care.

The initiating Investigation Management Group and Investigation Team should undertake the investigation on behalf of the other geographical areas. A senior manager from each area should join the initiating SCAMG to discuss this and agree any resource implications involved.

If the number of victims outside the geographical boundaries of the original joint Investigation Team increases to the extent that it cannot respond, then an OCAMG and / or an Investigation Team in the new geographic area should be established.

It is essential that there is a joint SCAMG to provide overall planning. If it is necessary to have more than one Investigation Team, there must be close working between coordinators and processes for full information sharing.

**Closure** - There must be a clearly defined exit strategy not only in relation to the closure of the investigation, but also with regard to the victims and witnesses, who may require on-going support at the conclusion of any trial or investigation.

Staff involved directly in the investigation as well as other operational staff who have kept day to day services running where colleagues have been seconded into the investigation team, need to be thoroughly debriefed.

At the conclusion of the investigation each agency should undertake a review, with a view to identifying any changes to policy, practice or disciplinary processes

that may be necessary. Such a review will complement any Child Practice Review that may be concurrent or have been completed.

The SCAMG should have a final meeting where concluding information and debriefing can be shared. An overview report should be compiled and presented to the safeguarding partnership.

Consideration must also be given to the storage and security of the files relating to the investigation. Access to such records may well be necessary in relation to any on-going appeals, civil proceedings or applications for compensation.

Best practice is for the files to be centrally archived at a single location, and retained for a minimum period of 6 years from the completion of the investigation, or six months beyond the completion of any sentence, whichever is the longer.

## 5. Putting Policy into Practice

This policy outlines the key duties and requirements in relation to complex (organised and multiple) abuse cases involving children and young people. More detailed guidance notes and procedures will be available to support and assist practitioners with the interpretation of this policy and the relevant sections of the Act.

## 6. Policy Approval and Review

Policy Approved By:	
Date Approved:	
Review Frequency:	Every three years
Date Policy To Be Reviewed:	Apr 2022
Responsible Officer(s):	

