
West Mercia Police and Crime Commissioner

**Response to the independent inquiry into Telford Child Sexual
Exploitation (IITCSE) recommendations**

September 2022

Executive Summary

The report of the independent inquiry into Telford Child Sexual Exploitation chaired by Tom Crowther QC was released on the 12th July 2022. The Terms of reference for the investigation was to examining the nature, extent and patterns of Child Sexual Exploitation (CSE) in Telford; the impact of CSE; the history of changes made to practice, policy and legislation as they affect response to CSE in Telford; prevailing attitudes and changes in attitude; the taxi industry and night-time economy; and, most significantly, the response of third-party organisations to CSE, or suspected CSE, and the adequacy of those responses.

The PPC was one of the agencies that were included in the scope of the inquiry and continues to have an important role in seeking assurance that West Mercia Police are providing an adequate response to CSE across the region, working with partners, to support victims and identify and deal with perpetrators.

The Office of the PCC have considered what response is required to the recommendations and issues raised and provide advice to the PCC as to the best and most appropriate courses of action. The inquiry made 47 recommendations of which 2 mentioned the PCC directly. Whilst the majority of recommendations are primarily the responsibility of other organisations the OPCC have considered the implications given the role the PCC has in police governance and partnership work

This report sets out the actions that the OPCC will take to respond to the issues raised in the report and also sets out in the appendix where the OPCC will take action to the respond to the recommendations raised.

Action Plan for OPCC

OPCC Actions	Who	When
Additional one-off Holding to Account (HTA) will be added into the programme. This will focus on the WMP response to the IITCSE report but also following up on CSE provision across West Mercia. Expectation that this will result in actions that will need to be followed up on. Any additional work will be captured in the OPCC work programme at that point.	Policy	Mar-23
The commissioning team will complete a review of Branch provision in West Mercia and make recommendations for future provision of CSE support services in the Telford area The response to the Safer West Mercia Plan includes a Commissioning Team review of whether the service provision in Telford should include Branch, which would make then provide consistency of service provision across West Mercia.	Commissioning	Mar-23
The Head of Commissioning will liaise with WMP and specifically SP&I over the work programme for a CSE Needs Assessment West Mercia Police (WMP) are proposing to carry out a Needs Assessment (including a problem profile) on CSE across West Mercia. The outcomes from the	Commissioning	Mar-23

Needs Assessment will be reviewed and inform any additional work needed to improve CSE service provision across West Mercia.		
<p>Provide relevant training to the OPCC employees related to identifying and understanding how to respond to issues of CSE</p> <p>OPCC agreed that it is important that all staff within the OPCC receive relevant training in relation to CSE. Trauma Informed training is being done in WMP, which will be applicable to some members of the OPCC team. We will work also with our commissioning providers to identify relevant training for the rest of the team, who are not involved in front line service provision.</p>	Commissioning	Dec-22
<p>The OPCC will work with Partners to ensure that there is a co-ordinated approach to CSE issues across the region.</p> <p>The OPCC has identified the Crime Reduction Board and Community Safety Partnerships (CSP) as an important partner in tackling CSE in the region. A CSP summit is happening in September and Crime reduction Board meeting in November. These provide a good opportunity to discuss with them the response to the threat of CSE in their areas. The OPCC will review outcomes from the meetings and identify whether any further action is required</p>	Commissioning	Sep-22
<p>The OPCC will review the response from WMP to the IITCSE recommendations.</p> <p>By reviewing the WMP response the OPCC can identify whether there is further work that is required by the PCC to monitor implementation by WMP.</p>	All	Sep-22

Next Steps

The OPCC will deliver the action plan over the next six months and provide regular feedback on progress to the PCC through the governance structures in place. The expectation is that there will be further work that is identified to ensure that appropriate governance structures, processes and support are in place to tackle CSE across West Mercia.

Response to recommendations raised in the ITTCSE report

No'	Heading	Detail	Agreed response from OPCC
1	Establishment of a 'Joint CSE Review Group'	<p>The Council and WMP should take the lead in establishing a joint group, and shall identify and include other key stakeholder authorities, to include education and health sectors and such third sector agencies as the Council and WMP as lead agencies deem appropriate. The Joint Group's function will be to meet every six months, in order to:</p> <ul style="list-style-type: none"> • Consider data and information gathered – such data to include: the incidence, trends and locations of CSE within the borough; missing persons/truancy data; referral numbers and investigations/complaints; licensing and night-time economy information; and any other data considered relevant; • Analyse such data and information in order to provide a reliable set of statistics against which the threat/risk and prevalence of CSE can be measured, and any apparent increase or decrease in the number of CSE cases considered; • Maintain minutes of each meeting, with appropriate action plans attached; and • Publish a report setting out the results of the analysis and accounting to the public for the action being taken in response – as set out in Recommendation 2. 	<p>Expectation that the OPCC will be part of the Joint CSE Review group (expecting it to be at a senior level). Will therefore ensure that a representative is sent to the meeting and that any actions are brought to management team.</p> <p>Action - Ensure OPCC representation at Joint CSE Review Group</p>
2	'Joint CSE Review Group' to publish an annual CSE Report	<p>The Council and WMP should lead the 'Joint CSE Review Group' in publishing an annual report, titled "Joint CSE Review Group Annual Report" (or similar). This report should include, at a minimum:</p> <ul style="list-style-type: none"> • The output of the statistical analysis carried out in accordance with Recommendation 1; • Current staffing numbers/caseload ratios within the WMP CE Team and the Council's CATE Team; • The extent of collaboration and support sought from third sector organisations, including transparency about the level of funding ring-fenced for such support; • Details of steps taken in relation to CSE training and awareness campaigns; • Details of PCC funded resources and initiatives relevant to CSE; • Statistics regarding the number of NRM referrals; • Updates as to work undertaken to improve relevant services to children within the health and education sectors; and • A summary of any complaints received by any of the member authorities regarding the handling of a CSE matter. Each member organisation should publish a copy of the report on its website. 	<p>This will be managed through being a member of the group.</p> <p>Action - Ensure OPCC representation at Joint CSE review Group</p>

3	WMP to prepare mapping and prevalence data to be shared with the Joint CSE Review Group	<p>In line with Recommendations 1 and 2: in advance of each Joint CSE Review Group meeting, and for the purposes of its Annual Report, WMP should prepare the following:</p> <ul style="list-style-type: none"> • An analysis of the incidence of, and its response to, CSE within Telford (a “prevalence report”). Subject to the need to protect the integrity of ongoing investigations and policing tactics, this should include reference to the numbers of complaints, reports, investigations, arrests, charges and conviction rates, as well as geographical distribution of CSE ‘hotspots’ within Telford. • A CSE activity analysis (a “mapping report”) based on intelligence received from its own sources (including that collated via the ‘Joint CSE Review Group’), in order to ensure that an ongoing and targeted approach to CSE is maintained. Copies of the prevalence report and mapping report should also be shared with the PCC in line with Recommendation 41. 	Action - To be included in the HTA session to obtain confirmation that WMP are mapping data and ensuring that it is shared
4	Council to prepare CATE data to be shared with the ‘Joint CSE Review Group’	<p>In line with Recommendations 1 and 2: in advance of each ‘Joint CSE Review Group’ meeting, and for the purposes of its Annual Report, the Council should prepare the following:</p> <ul style="list-style-type: none"> • An analysis of its response to CSE within Telford & Wrekin to include numbers of CSE cases dealt with by Safeguarding processes, those dealt with by CATE processes, and to detail how many are new cases, how many are active, and how many have been closed. 	Action - Ensure OPCC representation at Joint CSE review Group
5	Schools and colleges to prepare data to be shared with the ‘Joint CSE Review Group’	<p>Secondary schools and colleges should prepare the following, in association with the Council:</p> <ul style="list-style-type: none"> • A six-monthly CSE statement (to be submitted prior to the six-monthly ‘Joint CSE Review Group’ meeting) giving details of specific children showing indicators which may be indicative of CSE (the “children at risk report”), whether or not that behaviour merits immediate referral to CATE or Safeguarding; and • A further six-monthly report (to be submitted prior to the six-monthly ‘Joint CSE Review Group’ meeting) containing such information as may allow effective mapping of CSE (“school mapping report”), including but not limited to, ages of children involved, the place of exploitation where known, their general places of residence, and any information which may establish the identities of perpetrators. • The above information should also include statistics and information relating to any missing from school episodes/ truancy records, in order to agree any steps that should be taken in relation to children that are shown to have regular difficulty attending school. The children at risk report and the mapping report should be shared with the CATE Team, which in line with Recommendations 1 and 2 will share the reports with the ‘Joint CSE Review Group’ meeting for the purposes of its Annual Report. 	Action - Ensure OPCC representation at Joint CSE review Group

6	Information sharing training to be implemented in order to clarify responsibilities around confidentiality, information sharing and safeguarding	<p>All organisations with safeguarding responsibilities, to the extent it is not already in place, should:</p> <ul style="list-style-type: none"> • Implement an immediate programme of information sharing training for all those dealing with children, or in positions where referrals to Safeguarding is a possibility, to include at a minimum, police officers, PCSOs, social workers, CATE practitioners, youth workers, licensing officers, teachers, school counsellors and nurses, sexual health advisors, GPs, GP practice nurses, A&E doctors and nurses; • Ensure such training sets out the principles of when information should not be shared and when it must be, including practical exercises; and • Ensure that the above training is mandatory for any future recruits, and is repeated for existing team members no less than every two years, with training records to be made and retained. 	Action - To be included in the HTA session on how information sharing around safeguarding is operating.
7	Ring-fencing of CATE Team resource	<ul style="list-style-type: none"> • The Council should commit to the continued existence of the CATE Team within Telford at no less than its current strength in both numbers and budget (adjusted for inflation), for a period of no fewer than five years from the date of publication of this Report. • Following the expiry of that period, in the event of no such further ongoing commitment, the Council should state publicly the reasons why, and the proposals for future management of children at risk of CSE. • The Council should ensure that (i) CATE practitioners are protected from abstraction to cover other work; and (ii) practitioner caseload remains no higher than the current level. • The Council should publish information regarding the resourcing and workloads of the CATE Team as part of the 'Joint CSE Review Group's' Annual Report. 	Action - Ensure OPCC represented at strategic exploitation meetings. Ensure funding over medium term is discussed and that provision of services is appropriate over the medium term.

8	Ring-fencing of WMP's CE Team resource	<ul style="list-style-type: none"> • WMP should commit to the continued existence of the CE Team within Telford – at no less than its current strength in both numbers and budget (adjusted for inflation), for a period of no fewer than five years from the date of publication of this Report. • Following the expiry of that period, in the event of no such further ongoing commitment, WMP should state publicly the reasons why, and the proposals for future management of CSE investigations within WMP. • WMP should publish information regarding the resourcing and workloads of the CE Team as part of the 'Joint CSE Review Group's' Annual Report. 	Action - To be included in the HTA session on how the force will manage risk and demand in CSE across west Mercia.
9	Council should review its subgroups	<ul style="list-style-type: none"> • The Council should review the number, membership and remit of all groups and subgroups – internal and with partners - dealing with CSE. • Group membership should be limited, to ensure effective meetings, and be open to those most qualified to bring value - not be based simply on seniority. • Strategic meetings should always include a practitioner – someone working directly with children and their families 	No specific action - oversight role as part of Joint CSE review group
10	CATE Pathway to be reviewed	<ul style="list-style-type: none"> • The Council should carry out an immediate and thorough review of the published CATE Pathway to ensure that it sets out, with clarity, the model of response, intervention and support to be expected where a child has been sexually exploited, or is considered at risk of future sexual exploitation, including the circumstances in which a child on the child protection pathway can obtain CATE support, and vice versa. • This review should include consideration of current research and national best practice. • The CATE Pathway should be reviewed annually to ensure that it remains fit for purpose. 	No specific action - oversight role as part of Joint CSE review group
11	Implementation of an adulthood transition meeting	The Council should commit to immediate implementation of an adulthood transition meeting as part of the CATE Pathway for cases where a CATE child transitions to adulthood.	No specific action - oversight role as part of Joint CSE review group

12	Training of CATE Team and social workers	<p>The Council should ensure that all CATE Team members and social workers in Safeguarding receive regular external training covering:</p> <ul style="list-style-type: none"> • The concepts of risk and harm; and • The importance of rigorous recording of information (including detailing the exploitation suffered and naming children and perpetrators). 	No specific action - oversight role as part of Joint CSE review group
13	Case File Review/Audit	<p>The Council should commit to an annual external audit of no fewer than ten randomly selected CATE case files and of no fewer than ten randomly selected Safeguarding case files relating to children who have been exploited or are at risk of exploitation, to ensure proper emphasis is established and maintained. The Council should also ensure that:</p> <ul style="list-style-type: none"> • Safeguarding and CATE Team members focus appropriately on contextual safeguarding and not simply upon child behaviour modification; and • The extent and quality of information sharing is properly assessed. 	No specific action - oversight role as part of Joint CSE review group
14	CATE's information sharing protocols with schools to be reviewed	The Council should review the information sharing protocols in place with schools, and update them as necessary to ensure that the CATE Team shares information with schools that identifies CSE threat levels, trends and groups as well as individuals; with a view to allowing schools to react, monitor and protect children better.	No specific action
15	Treating parents as partners	The Council should commit to treating parents as partners in CSE cases and should set out publicly what a parent is entitled to expect when their child is being supported by the CATE Team.	No specific action
16	Approach to victims/survivors as adults	The Council should undertake a review of social care cases to establish whether there is any identifiable bias in respect of parents who are victims/survivors of CSE and actions that have been taken in respect of safeguarding their children, and the reasons for such actions. If the review reveals any patterns, future policies should be reviewed and training provided to ensure no unconscious	No specific action
17	Counselling for victims/survivors	The Council should commit to the provision of contingency funding for continued access to counselling for affected victim/survivors and family members following the publication of this Report.	No specific action - OPCC will respond to any requests for support for victims commissioning in Telford CSE.

18	Council to review annually all CSE therapeutic support services	<p>The Council should annually review its CSE therapeutic support offering, to include services it provides directly and services it commissions, to ensure that:</p> <ul style="list-style-type: none"> • The offering is sufficiently broad in scope, encompassing mental health support and specialist trauma based support; • The support is available for victims/survivors as children, when transitioning to adulthood, and ongoing support for victim/survivors in adulthood, including a focus on relationships and parenting; • Such support is sourced from a range of providers, including national and local third sector groups; • The support offering as a whole is clearly signposted to CSE victims/survivors and their families; and that • The allocated budget is sufficient for need. <p>The review should be published annually as part of the 'Joint CSE Review Group's' Annual Report.</p>	<p>WMP/OPCC are commissioning a strategic needs assessments.</p> <p>Action - Results will be reviewed by OPCC and actions identified.</p>
19	Youth support	The Council should commit to collaborating with those bodies best able to offer replacement for community support services for children - for example, youth club provision - no longer provided by the Council.	No specific action
20	Council, WMP and CCG to review processes relating to information sharing in respect of risk of HIV	<p>The Council, in association with the CCG and WMP, should review its processes relating to information sharing in the event of discovery of risk of exposure to HIV by a perpetrator of CSE and, if no such document exists, draft an infection protocol which makes clear:</p> <ul style="list-style-type: none"> • When information relating to risk of HIV exposure must be shared and with which bodies; • The legal basis for that sharing, to avoid doubt; and • Which body should take the lead on matters relating to information sharing, including identification of at risk contacts. Furthermore the Council, WMP and the CCG should consider whether their existing individual and joint processes allow for the effective identification of risk of HIV exposure when a complaint is made of (particularly non-recent) exploitation; and if it is considered they do not, to amend those procedures, or to indicate why such procedures cannot be amended to allow such effective identification of risk 	Action - OPCC to review WMP action plan in response to recommendations and identify any further oversight required
21	Council should refresh its system for reporting of concerns	<ul style="list-style-type: none"> • The current website based system for reporting of concerns via Family Connect requires registration. This could serve as a barrier to reporting. • The Council should institute and publicise a system whereby such concerns can be reported truly anonymously via a number of channels, whether by whistle-blowers or members of the public. 	No specific action

22	Council to review its CSE complaints procedure	<p>The Council should carry out a full review of its complaints process, insofar as this relates to the handling of CSE cases. This should include:</p> <ul style="list-style-type: none"> • Preparing and publishing a comprehensive complaints procedure for complaints relating to CSE which should be readily accessible and published on its website; • Setting out a uniform process for dealing with all complaints relating to CSE, led by a named team within the Council; • Establishing a suitable repository for all complaints relating to CSE, so that all documents relevant to a complaint including, ultimately, its outcome, are readily accessible; • Ensuring that all staff, in particular CATE practitioners, are suitably trained so as to identify complaints, or feedback from service users which is not in the form of a complaint but which suggests cause for concern; • Signposting to assistance which can support individuals with the process and substance of a complaint; and • Publishing annually, as part of the Joint CSE Review Group's Annual Report, a summary of suitably anonymised CSE complaints and a review of complaints or concerns relating to CSE to include themes and lessons learned. 	No specific action
23	23. Licensing information sharing with neighbouring authorities	The Council should seek to agree with its neighbouring authorities a stricter information sharing agreement, a joint enforcement protocol and a common licensing pricing structure.	No specific action
24	Taxi driver training	The Council has an established CSE training programme for taxi drivers; this course should be offered, at a cost, to drivers licensed elsewhere. In the interim, the Council should publicise the high standards that Telford licensed taxis are already required to meet and raise awareness of how to recognise a locally licensed taxi.	No specific action
25	Council to review and improve its complaints process for public complaints or concerns in relation to licensing and/or taxi drivers	<p>The Council should:</p> <ul style="list-style-type: none"> • Review the ways in which the public can report licensing complaints, to include consideration of instant reporting by way of text or online services; • Publicise its role in taxi regulation, the need for the public to report concerns, and the ways in which concerns can be reported, to include prominent advertising in night-time economy 'hotspots' and a requirement for in-taxi notices; and • Ensure a continuing programme of public awareness raising the requirement for licensed drivers to display their licence, so as to address 'badge-swapping'. 	No specific action

26	Council to collate data relating to complaints against taxi drivers	<p>The Council should publish annually, as part of the 'Joint CSE Review Group's' Annual Report, a taxi licensing review to include:</p> <ul style="list-style-type: none"> • How many complaints it has received about taxi drivers; • How many of those complaints related to drivers licensed by the Council; • How many complaints related to sexual behaviour, including use of sexualised language or harassment, and of those, how many related to complaints involving such behaviour towards children; and • How many complaints resulted in action by the Licensing Team, and what action resulted. 	No specific action
27	Council to implement a protocol for the sharing of safeguarding information for the purposes of taxi licensing	<p>The Council should draft and publish within six months of this Report a protocol for the sharing of safeguarding information for the purposes of taxi licensing, setting out:</p> <ul style="list-style-type: none"> • The procedures by which, on receipt of a new application, renewal, or a complaint about a driver, information will be requested by the Licensing Team from Safeguarding, WMP, neighbouring local authorities and such others as are deemed appropriate; and • The circumstances in which the Licensing Team will share information with Safeguarding, WMP, neighbouring local authorities and such others as are deemed appropriate, upon the receipt of a complaint and, if applicable, later imposition of a sanction against a taxi driver. 	Action - PCC to review WMP action plan and identify any further oversight required
28	Council to explore implementation of CCTV in taxis	<ul style="list-style-type: none"> • The Council should explore the possibility of installing CCTV in taxis. It should begin by carrying out a full consultation amongst interested parties, in the borough and in the region. • The Council should consider any funding applications that may be available to assist in this regard. 	No specific action
29	WMP role in taxi licensing enforcement to be reviewed	<ul style="list-style-type: none"> • WMP should carry out a review of its current involvement in joint taxi licensing enforcement exercises in order to ensure that the exercises are sufficiently regular and rigorous, and that any information or intelligence of concern relating to CSE activity is captured and acted upon. • This should include considering which officers are involved in such enforcement exercises, and that those officers are of an appropriate rank and level of training. • If not already in place, a named officer should be designated to liaise with colleagues in the Council's Licensing Team to ensure appropriate sharing of information relating to taxi drivers who may pose a risk/concern. 	No specific action
30	Council to review historic premises licences	<ul style="list-style-type: none"> • The Council should take steps to ensure that appropriate conditions are applied in respect of any premises operating under a historic licence; and • Whatever the terms of a historic licence, the Council should make clear its expectation that any nightclub should operate an '18 or over' entry policy. 	No specific action

31	Council to review its oversight of restaurant and take-away establishments	<ul style="list-style-type: none"> • In association with its Night-Time Economy officer, Licensing Team and WMP, the Council should review information collection and sharing with regard to CSE concerns involving restaurants, takeaways, mobile food outlets and associated residential premises. 	No specific action
32	All schools and colleges to review and refresh training around CSE	<p>Where this is not already happening, all schools and colleges, in association with the Council, should:</p> <ul style="list-style-type: none"> • Commit to annual training of all teachers and staff in CSE awareness; • Repeat such training at least every two years; • Set out a programme of age-appropriate CSE awareness raising sessions for their pupils, whether that programme is delivered in the context of PSHE or otherwise; and • Arrange a CSE awareness raising session for parents, no less frequently than annually, in the opening months of the academic year. Where the school in question is a primary school, such CSE awareness should be aimed at pupils in Year 5 and above, or, if not felt appropriate, a letter should be sent to all parents explaining why such a programme is regarded as undesirable within the school, and enclosing written information on CSE 	No specific action
33	Schools and colleges to appoint a CSE Lead	All secondary schools and colleges in Telford, in association with the Council, should designate a CSE Lead (who should not be the Designated Safeguarding Lead ("DSL")), but whose identity should be known to parents and children, and who must be easily accessible to children. The CSE Lead should compile the children at risk report and the mapping report (in accordance with Recommendation 5) in consultation with colleagues, including the DSL	No specific action
34	Schools to review CPOMS policy and systems for information sharing	<p>In association with the Council, all schools and colleges in Telford using the CPOMS system should ensure that:</p> <ul style="list-style-type: none"> • The school or college has a written policy in place to govern the recording of CSE related information onto CPOMS; • The policy sets out how information from CPOMS should be shared with partner agencies (namely WMP and Safeguarding) and considers the practicalities for doing so; • All relevant information is routinely recorded on CPOMS; • The information should include a statement of what the concerns are, what action was taken, and what follow up was thought to be needed; and that • A six monthly review is carried out of the information logged on CPOMS, to ensure all relevant information (i.e. information which may have been identified as a possible indicator of CSE) is routinely recorded. <p>This process should be led by the DSL.</p>	No specific action

35	Schools and Colleges to carry out an annual review of site security	In association with the Council, all schools and colleges in Telford should carry out an annual review to consider the adequacy of the school's site security provision, including arrangements for monitoring and recording any unauthorised access, to ensure that pupils are protected from potential perpetrators of CSE while at school, and to ensure appropriate liaison with WMP or Safeguarding where required.	No specific action
36	WMP to review use of CSE marker system	WMP should review the use of the intelligence marker system in CSE cases. The review should include: <ul style="list-style-type: none"> • An assessment of the suitability of training, and of effectiveness of guidance and procedures for the application of CSE markers; and • A historic search (to the extent possible) of CSE cases to ensure markers have been appropriately applied. 	Action - OPCC to review WMP action plan in response to recommendations and identify any further oversight required
37	Police officer and staff CSE training to be reviewed	WMP should ensure that: <ul style="list-style-type: none"> • All its officers, PCSOs and public facing staff receive, as part of their initial induction and learning, training on CSE; • All such staff should also receive regular refresher training and updates on CSE to include: the latest known trends around how CSE may be perpetrated; warning signs to look out for; and reminders as to the action to be taken in response to any concerns about CSE; and • Any such training addresses the appropriate use of language and techniques to encourage victim disclosure and to avoid victim-blaming. 	Action - Review of HTA/WMGB and other governance arrangements to identify effective forum to obtain oversight that WMP can respond effectively to CSE.
38	Review of WMP complaints handling procedures required	<ul style="list-style-type: none"> • WMP should review its internal complaints handling procedures to ensure that any complaint raised in a CSE matter is acknowledged immediately and dealt with in a timely fashion. If there are any existing timescales for a response, the review should consider whether those timescales are being met, and if not, it must consider why not and how this should be rectified. • WMP should also ensure that whenever a complaint is raised about an officer or staff member's conduct which relates to a CSE matter, consideration is given to whether any further training is required on the part of that individual, regardless of any other action that may be taken in relation to misconduct or performance issues. • WMP should publish annually, as part of the 'Joint CSE Review Group's' Annual Report, a review of complaints or concerns relating to CSE to include themes and lessons learned. 	<p>Action - OPCC to review WMP action plan in response to recommendations and identify any further oversight required</p> <p>OPCC will monitor WMP complaints review process.</p> <p>Action - Review the information provided in quarterly meetings with the PSD to ensure that it captures CSE issues (if applicable).</p> <p>Action - Raise with JASC members through Ethics & Standards to see whether they will consider this as an area of focus for their work</p>

39	Multi-agency approach to NRM referrals to be reviewed	<p>The Council and WMP should:</p> <ul style="list-style-type: none"> • Review and enhance the current NRM training provision to ensure that all staff who may deal with trafficked children are appropriately trained; • Ensure that such training includes when a referral should be made, and the appropriate pathways and protocols to be followed in all NRM-qualifying cases. • Liaise with one another to ensure that each organisation's protocols for NRM reporting is clear; that relevant information is shared; and agreement reached as to which authority should be responsible for making the referral, in circumstances where both authorities are involved. 	Action - OPCC to review WMP action plan in response to recommendations and identify any further oversight required
40	PCC to commit to continued funding of CSE initiatives	<p>The PCC should commit to continued funding of the following initiatives:</p> <ul style="list-style-type: none"> • Taxi Marshal scheme; and • Street Pastors. 	<p>Projects currently funded through individual CSPs based on their assessment of need.</p> <p>Action - task CSPs to review current provision across the region (especially in Telford) prior to the CSP Summit</p> <p>Action - ITTCSE report on CSP summit agenda and mapping will be used to inform discussion on whether provision is appropriate across the region</p>
41	PCC Holding to Account ("HTA") Meetings to be improved	<p>The PCC and WMP should ensure that:</p> <ul style="list-style-type: none"> • The Chief Constable provides relevant data and statistics relating to CSE (including risk/threat analysis; case numbers; trends, and the information prepared for the 'Joint CSE Review Group' as per Recommendation 3 above) and raises any related budgetary concerns at the HTA meetings; • Any complaints or concerns reported to WMP relating to the handling of any CSE cases are shared with the PCC as part of the HTA meetings; and • Minutes of the PCC and Chief Constable weekly meetings are to be maintained. 	<p>Action - Points 1 & 2 will be incorporated into HTA meeting</p> <p>Action - Point 3 – Chief Executive to discuss with PCC and CC</p>

42	Quality of CSE training delivered to NHS providers and practitioners	<p>In respect of CSE training, in order to increase the likelihood of training translating into practice, the CCG needs to:</p> <ul style="list-style-type: none"> • Ensure that the training delivered to providers and practitioners includes training on effective ways of engaging with children and encouraging professional curiosity at every contact; • Review the content and format of the training to ensure that it does not simply consist of the dissemination of written information; • Ensure there is creativity in how the training is delivered; for example, practical exercises and/or tests to show understanding, including a minimum pass mark, to ensure the training is embedded in practice; and • Review the method by which assurance is provided as to the percentage of providers/practitioners that have completed the necessary training; for example, simply because a practitioner was on a distribution list is not sufficient assurance. 	No specific action
43	Improvements to trauma-related mental health services for victims and survivors of CSE in Telford & Wrekin	CCG and NHS England should consider all avenues to secure an increase in funding for trauma-related mental health services, in particular for victims/survivors of CSE.	<p>OPCC already supports joint bids for funding and has representation at the Sexual Violence Group.</p> <p>Action - review strategic partnership representation (Health and Wellbeing board / Integrated Care Partnership) to identify where we have oversight when working with partners. Where we do have a strategic partnership with Health organisations that we use it to inform oversight of CSE</p>
44	The Council to consider increasing capacity for health services to sexually exploited children	<p>The Council should review the current capacity (and ability to meet demand locally, compared to the average nationally) of the following services, and where possible commit to a further increase in capacity by 2024:</p> <ul style="list-style-type: none"> • Health visitors; and • School nurses 	No specific actions
45	Guidance for sexual health clinics/to all health providers responsible for giving sexual health advice to be reviewed	<p>Current sexual health guidance issued to practitioners should be reviewed, and kept under review, by the CCG to ensure that it:</p> <ul style="list-style-type: none"> • Reminds professionals of the need to consider the potential for CSE to be a reason that the child is seeking sexual health support; and • Clarifies the policies and referral pathways to follow, in the event they have a concern that a child may be being sexually exploited, or at risk of sexual exploitation. 	No specific actions
46	GPs in Telford & Wrekin to be	<ul style="list-style-type: none"> • The CCG should consult with GP practices in Telford & Wrekin to consider what can be done to implement a system for flagging CSE concerns on a child's medical records. 	No specific actions

	consulted about CSE data collection	<ul style="list-style-type: none"> • The CCG should seek to raise this issue at regional and national meetings, wherever possible. 	
47	GPs to implement review system for children moving to a different practice	<ul style="list-style-type: none"> • The CCG should ensure that the GP practices within the borough introduce a system so that, when a child moves to a different GP practice, the patient records are reviewed and any concerns regarding CSE are flagged to the new GP practice. • GP practices within the borough will be accountable to the CCG to confirm it has a policy in place for such file reviews. 	No specific actions

