

Child Sexual Exploitation

Guidance for Licensed Premises



SPEAK OUT
AGAINST CHILD
SEXUAL EXPLOITATION

Recognise the signs and speak out. Contact the Child Safeguarding Team on **0300 126 1000** or Northamptonshire Police on **101** or **999** in an **emergency**



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What is Child Sexual Exploitation (CSE)?

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It happens where a person or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

How does this affect Licensed Premises?

Licensed Premises are often used as a place to exploit and abuse victims of CSE. They provide an ideal environment for the grooming and sexual exploitation of children and young people. As part of the grooming process adults may meet young people or take them to licensed premises, to develop a relationship of trust and make them feel special by giving them 'treats' such as meals or alcohol, or by involving them in adult parties. A premise could be misused for this kind of activity by the people who are socialising or working there.

Under the Licensing Act 2003, premises licence holders and designated premises supervisors have a legal responsibility to make sure that children and young people are protected from harm at their premises. It is therefore important that the risk of child sexual exploitation is managed at your premises.

There are a number of criminal offences associated with child sexual exploitation which could have damaging consequences for a hospitality business, including a possibility of prosecution, action being taken against a premises licence and reputational and/or financial damage.

It is the responsibility of premises licence holders and their managers to make sure that suitable control measures are in place at licensed venues for the protection of children from harm.

What actions are required to protect the business?

Under the Licensing Act 2003, the 'due diligence' defence can be used to protect your business if you can demonstrate that all reasonable steps have been taken to manage risk. Here are some suggested safeguarding measures to help evidence 'due diligence' and keep children safe:-

- Undertake a written children and young people's risk assessment and use it to inform your operating policy and staff training
- Staff should be trained to recognise indicators of child sexual exploitation and know how to report concerns
- Staff should be trained to operate an age verification scheme, know what types of identification are acceptable and recognise signs of proxy purchase of alcohol
- Staff training records should be maintained
- Activity of premises should be monitored (for example, using CCTV or a regular patrol)
- Suspicious activity should be reported to the Police (including details such as vehicle registration numbers, description of individuals) and should be recorded in your incident log
- If you, or your staff are in a situation involving the supervision of a vulnerable young person at your premises, it is important to follow a consistent and auditable protocol
- If you have a delivery service (for example hot food) enforce a Code of Conduct to promote good safeguarding when deliveries are made to unaccompanied children



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SAY SOMETHING IF YOU SEE SOMETHING



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In what way might Licensed Premises be used for CSE?

- Adult venues (for example, nightclubs/sexual entertainment venues) that are frequented by children or young people
- Venues where underage drinking takes place
- Premises providing goods or services that can be offered to children as gifts in exchange for sexual favours (for example, free food, drinks or cigarettes; free transport; free access to a venue in exchange for sexual favours)
- Areas of premises that are not supervised or security checked (toilets, beer gardens, play zones)
- Premises where information technology equipment is used (for example, internet access, mobile phones). Social media can be used to groom vulnerable young people and cameras may be used to record or distribute indecent images of children
- Premises providing facilities for private parties, private dancing/entertainment booths or overnight accommodation



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Indicators of CSE for Licensed Premises:

- Young people in the company of older guests
- Older person purchasing alcohol for a young person/young people
- Young person who appears under the control or instruction of others
- Young people trying to buy alcohol without ID or with a fake ID
- Young people being taken/collected from Licensed Premises
- Young people that look distressed, intimidated, frightened, dishevelled or disorientated
- Young people under the influence of drugs or alcohol
- Young people with injuries such as bruising or blood stains
- Change in the personality, wellness or demeanor of a young person you see regularly
- Young people displaying inappropriate sexualised behaviours or dressed inappropriately for their age
- Young people being taken to areas of licensed premises that are not supervised or security checked
- Victims may have more money than a young person ordinarily would or may own expensive phones and clothing than you would expect for someone their age
- Men requesting regular taxi rides to and from locations with young people
- Adults who appear edgy in the company of young people
- You may overhear conversations or witness sexual activity within the premises
- Frequent suspicious activity in the same place
- A frequent guest of the premises seen with different young people

REMEMBER – Young People will often try to make themselves look older than they actually are. Always consider the age of the young person even if, at first glance, they may look over 18.

What to do if you have concerns about a young person in Licensed Premises

If you think the young person is at imminent risk of harm, call 999 to report your concern.

Offer support to the young person:

- Ask if they are ok
- Don't serve them any alcohol or allow anyone to buy them another drink
- Check that they are not receiving unwanted attention
- Check whether they know who they are with and if they feel safe being/leaving with them
- Offer to call a licensed taxi for them
- Offer to call a parent/carer
- Ask CCTV to monitor them
- Make sure any person you are unsure of knows you have seen their face

Notify your Manager and gather any relevant information:

- Document detailed descriptions of any suspected offenders
- Document detailed descriptions of the children and young people who you are concerned about
- Download and secure any CCTV
- Identify methods of payments i.e. cash/credit/debit cards
- Report any relevant registration number plates
- Record any observations that concern you in your incident logs


Report the concerns:

- Call the Police non-emergency number 101 or in an emergency 999
- Have a Manager meet Police Officers on their arrival
- Provide a written record of your concerns and descriptions of individuals to the Police



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Safeguarding Checklist	
Nominate a safeguarding representative	
Keep refusal records	
Maintain an incident log book	
Distribute and display literature and materials in staff areas	
Undertake age verification checks	
Only accept photo ID	
Undertake patrols	
Install CCTV monitoring and retain CCTV recordings	
Require visitors to use the main entrance to the premises	
Include CSE in your Business Risk Assessment	
Establish a whistle blowing policy	
Share information and intelligence appropriately	
Report suspicious activity to local Police	
Invest in CSE staff training and keep up to date training records	

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