



# Organised and Complex Abuse Policy

**Responsible for policy:**  
**Chair of Directors**

**CC3: Quality Provision and Performance**

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## Definitions

In this **Organised and Complex Abuse Policy**, unless the context otherwise requires, the following expressions shall have the following meanings:

- i **'The Romero Catholic Academy'** means the Company named at the beginning of this **Organised and Complex Abuse Policy** includes all sites upon which the Company is undertaking, from time to time, being carried out. The Romero Catholic Academy includes; **Corpus Christi, Good Shepherd, Sacred Heart, Blue Sky, SS Peter and Paul, St Gregory, St John Fisher, St Patrick, Cardinal Wiseman, Shared Services Team.**
- ii **'Romero Catholic Academy'** means the Company responsible for the management of the Academy and, for all purposes, means the employer of staff at the Company.
- iii **'Board'** means the board of Directors of the Romero Catholic Academy.
- iv **'Chair'** means the Chair of the Board or the Chair of the Local Governing Body of the Academy appointed from time to time, as appropriate.
- v **'Governance Professional'** means the Governance Professional to the Board or the Governance Professional to the Local Governing Body of the Academy appointed from time to time, as appropriate.
- vi **'Catholic Senior Executive Leader'** means the person responsible for performance of all Academies and Staff within the Multi Academy Company and is accountable to the Board of Directors.
- vii **'Diocesan Schools Commission'** means the education service provided by the diocese, which may also be known, or referred to, as the Birmingham Diocesan Education Service.
- viii **'Local Governing Body'** means the governing body of the School.
- ix **'Governing Body Representatives'** means the governors appointed and elected to the Local Governing Body of the School, from time to time.
- x **'Principal'** means the substantive Principal, who is the person with overall responsibility for the day to day management of the school.
- xi **'School'** means the school or college within The Romero Catholic Academy and includes all sites upon which the school undertaking is, from time to time, being carried out.
- xii **'Shared Services Team'** means the staff who work in the central team across the Company (e.g. HR/ Finance)
- xiii **'Vice-Chair'** means the Vice-Chair of the Governing Body elected from time to time.
- xiv **'Local Authority Designated Officer (LADO)'** means the officers working on behalf of Coventry City Council and the Coventry Safeguarding Children Partnership to address, advise and manage allegations and concerns against staff, carers and volunteers by addressing matters of safety and wellbeing of children and young people
- xv **'Designated Safeguarding Lead (DSL)'** means the person appointed to take lead responsibility for child protection issues in school

## 1. Definition

Complex and organised abuse may be defined as abuse involving one or more abusers and a number of related or non-related abused children. The adults concerned may be acting together to abuse children, sometimes acting in isolation or may be using an institutional framework or position of authority to recruit children for abuse.

Such abuse can occur both as part of a network of abuse across a family or community and within institutions such as residential settings, boarding schools, in day care and in other provisions such as youth services, sports clubs, faith groups and voluntary groups. There will also be cases of children being abused via the use of social media and digital technology.

Although in most cases of complex and organised abuse the abuser(s) is an adult, it is also possible for children/young people to be the perpetrators of such harm, with or without adult abusers.

## 2. Investigation

Each investigation of complex and organised abuse will be different, according to the characteristics of each situation and the scale and complexity of the investigation. All will require thorough planning, collaborative inter-agency working and attention to the needs of the child victim/s involved.

The investigation of complex abuse requires specialist skills from both Police and social work staff which usually involves the formation of dedicated teams of professionals and will need consideration of the needs for victims for therapeutic services. The consequent legal proceedings may add to the timescales of such investigations.

Some investigations become extremely complex because of the number of places and people involved, and the timescale over which abuse is alleged to have occurred. In these circumstances a specialist Investigation Management Group (see *the following link online* [Section 7, The Investigation Management Group](#)), as well as a Strategic Management Group (see *the following link online* [Section 6, The Strategic Management Group](#)) may be set up.

The complexity is heightened where, as in historical cases, the alleged victims are no longer living in the setting where the incidents occurred or where the alleged perpetrators are also no longer linked to the setting or employment role. These will all need to be taken into consideration when working with a child.

A senior Police Officer may convene a Gold Group if a particular investigation merits senior oversight from a Police perspective. Police may invite senior members of staff from all agencies, so that information can be shared and strategy agreed. It is not the remit of the Gold Group to direct investigations. These meetings are minuted and those minutes may be revealed to the prosecution, should criminal proceedings be undertaken.

The confidentiality of the information relevant to any Section 47 Enquiry and criminal investigation must be strictly maintained by those involved and must not be disclosed to others, including others within the agency, unless absolutely necessary.

## 3. The Child

The most important consideration is the safety and well-being of the child or children.

In reconciling the difference between the standard of evidence required for child protection purposes and the standard required for criminal proceedings, emphasis must be given to the protection of the children as the prime consideration.

The investigation and enquiries must also address the racial, religious, cultural, language, sexual orientation and gender needs of the child, together with any special needs of the child arising from illness or disability.

A victim support strategy and protocol should be established at the outset. Support will be required in pre-trial, trial and post-trial periods if the case/s proceed to court. Minimum periods for contact should be established. It is clear from experience in research about complex investigations that many victims and families feel strongly that it is important that they remain in contact with the same staff throughout the investigative process.

#### 4. Referral

When receiving information or a referral, which may indicate complex and organised abuse, the recipient should immediately refer the matter to the Police and a manager in Coventry Children's Social Care.

If there is any suspicion that any staff or managers in a position of trust are implicated, the matter should be referred to the Chair of Coventry Safeguarding Children Partnership or in their absence, the Vice-Chair and a Senior Officer within the Police.

#### 5. The Strategy Meeting

A Strategy Meeting should be arranged to take place as a matter of urgency to assess the need for future action to be taken and, in particular, whether a criminal investigation should take place.

The Strategy meeting, chaired by a senior manager of Coventry Children's Social Care, must take place within **one** working day of the receipt of the referral and be formally recorded. The Safeguarding Children Partnership Business manager must be informed and will inform the Independent Chair of the Coventry LSCB, if appropriate.

The nominated senior staff of Coventry Children's Social Care and the Police should attend the meeting. The meeting will involve senior staff from health, education and other agencies as required and, where necessary, must ensure coordination across local authority boundaries.

The Strategy meeting must carefully note:

- An assessment of the information known to date:
  - The children named;
  - The children who may be in current contact with possible abusers;
  - Children who were, but no longer are, in contact with possible abusers;
  - Possible victims who are now adults.
- Decide what further information is required at this stage and ensure that appropriate steps are taken to obtain the information required;
- Establish if / to what extent complex abuse has been uncovered;
- Undertake an initial mapping exercise to determine the scale of the investigation and possible individuals implicated as well as prepare:
  - Witnesses to be interviewed prior to the interviews of children;
  - Multiple and simultaneous interviews.
- Consider a plan including resource implications, for investigation to be presented to the management and resources strategy group;
- Consider any immediate protective action required.

A strategic decision will need to be made by senior managers from the involved agencies as to whether the social work input into the enquiries/investigation can be managed in the conventional way or whether a specialist approach is required for example from a dedicated team outside the service.

This will usually depend on the number, geographical spread and age range of potential interviewees, as well as whether those implicated are foster carers or employees of any member agency.

Where the Strategy Meeting confirms that the investigation will relate to complex and organised abuse, it will appoint a multi-agency Strategic Management Group (see *the following link online* [Section 6, The Strategic Management Group](#)) to oversee the process.

Where a member of staff of any agency is implicated in the investigation, his or her line manager must not be a member of the Strategic Management Group.

## 6. The Strategic Management Group

The Strategic Management Group will be chaired by a senior officer in Coventry Children's Social Care and will:

- Complete the mapping process started by the Strategy Meeting as set out in *the following link online* [Section 5, The Strategy Meeting](#);
- Establish ownership of the strategic lead in the investigation;
- Decide the terms of reference and accountability for the investigating team, including the parameters and timescales of their enquiries/investigation;
- Bring together a team of people with the necessary training, expertise and objectivity to manage and conduct the criminal investigation and/or Section 47 Enquiry on a day to day basis. NB: Line managers or colleagues of any person implicated in the investigation must not be involved and the involvement of any person from the work place under investigation must be considered with particular care;
- Decide whether there is a need for an independent team to investigate the allegations, for example, the NSPCC, particularly where the alleged perpetrators are foster carers, prospective adopters or members of staff employed by a member agency of the Coventry Safeguarding Children Board;
- In cases of greater scale and complexity, appoint an Investigation Management Group (IMG) (see [Section 7, The Investigation Management Group](#));
- Ensure that appropriate resources are deployed to the investigation including access to legal and other specialist advice, resources and information;
- Ensure that appropriate resources are available to meet the needs of the children and families or adult survivors, including any specific health issues arising from the abuse;
- Ensure the investigating team are themselves supported with personal counselling if necessary and that issues of staff safety are addressed;
- Ensure that suitable accommodation and administrative support are available for the investigation;
- Ensure that an appropriate venue is available for interviews and the interviews are conducted in accordance with Achieving Best Evidence Guidance;
- Liaise as necessary with the Crown Prosecution Service at an early stage before arranging services for a child in need of counselling or therapeutic help so that the help can be given in a way which is consistent with the conduct of the criminal investigation;
- Agree a communications strategy including the handling of political and media issues, and communication as necessary with the Regulatory Authority (e.g. Ofsted, CQC);
- Ensure that records are kept safely and securely stored and a high level of confidentiality maintained at all times;
- Hold regular strategic meetings and reviews, which must be recorded, to consider progress, including the effectiveness of the joint working, the need for additional resources and next steps.

## 7. The Investigation Management Group

In cases of considerable complexity and scale, an Investigation Management Group will be appointed.

Membership of this group should include representatives from Coventry Children's Social Care, the Police, designated health professionals and the local authority's legal services, with other agencies being invited to participate as appropriate.

The tasks and functions of the Group will be subject to the terms of reference agreed by the Strategic Management Group (SMG), and will include the following:

- To provide a forum where professionals can meet, exchange information and discuss the implementation of the agreed investigation strategy;
- To ensure a consistent strategy for interviewing victims within and outside the councils area;
- To keep the SMG informed of resources and any shortfalls;
- To ensure a consistent and appropriate inter-agency approach to support victims and their families;
- To co-ordinate the inter-agency response to families and provide consistent information;
- To ensure information is shared appropriately with other agencies not represented on the SMG or the IMG;
- To ensure clarity of roles and responsibilities for staff involved in the investigation. Investigators will have full access to all records and key information;
- To ensure that relevant intelligence is passed between agencies and to the Police Major Incident Room (MIR)

## 8. End of Enquiry/Investigation Meeting and Report

[The Waterhouse Inquiry report](#) has noted the importance of adequate referral of information about suspected abusers. It is probable that an investigation will identify individuals who are suspected abusers but against whom prosecutions are not brought. If a suspected abuser is working with children in a child care position, or in the education service, evidence and information should be shared to support disciplinary proceedings and to enable, where appropriate, the referral of suspected abusers to the Disclosure and Barring Service (DBS) and the relevant regulatory bodies.

At the conclusion of the enquiry/investigation, the Strategic Management Group must evaluate the investigation, identify the lessons learned and prepare an Overview Report with recommendations and an Action plan for the Coventry Safeguarding Children Board, highlighting any practices, procedures or policies which may need further attention and require either inter-agency or individual agency action plans.

## 9. Links to other policies

This Organised and Complex Abuse Policy is linked to the following policies which can be found [www.romeromac.com](http://www.romeromac.com)

- Allegations of abuse against Staff Policy
- Whistleblowing Policy

## 10. Monitoring and Review

The Board of Directors delegate the implementation of this policy to the Governing Body.

This policy will be reviewed by CC3 Quality Provision, Performance and Standards.

## Useful Contacts

Service	Tel	Email	Website
<b>Coventry Safeguarding Children Partnership</b>	02476 975477	<a href="mailto:CoventryCSCP@coventry.gov.uk">CoventryCSCP@coventry.gov.uk</a>	<a href="#">Coventry CSCP</a>
<b>LADO</b>	02476 975483	<a href="mailto:lado@coventry.gov.uk">lado@coventry.gov.uk</a>	<a href="#">LADO</a>