



**Diogelu Gwent**  
**Gwent Safeguarding**

**Children Complex Abuse Protocol**  
(Including non-recent/historical abuse  
perpetrated against child victims)



Ratified by Board  
December 2022

Protocols and Procedures  
Sub-Group

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## 1. Introduction

Complex and organised abuse may be defined as abuse involving one or more abusers and a number of related or non-related abused children and may take place in any setting. The adults concerned may be acting collectively to abuse children, sometimes acting in isolation, or may be using an institutional framework or position of trust such as a teacher, coach, faith group leader or celebrity position to access and 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 electronic devices, such as mobile phones, computers, games consoles etcetera which all access the Internet.

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. Wherever children are involved in a complex abuse investigation, interviews should be conducted under Achieving Best Evidence guidelines and measures would need to be taken to safeguard the child.

Each investigation 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. Whether this be through the voice of the child or additional support for adult survivors of abuse occurring in childhood.

The investigation requires specialist skills from both Police and Social Care practitioners which usually involves the formation of dedicated teams of professionals and will require consideration to the needs of the victims for therapeutic services. The consequent legal proceedings may add to the timescales of such investigations.

Some investigations become more complex due to the number of places and people involved, and the timescale over which abuse is alleged to have occurred. In these circumstances a Joint Investigation Group as well as a Strategic Management Group may be set up.

## 2. Definition - What is Complex Abuse?

This is a multi-agency protocol where all agencies work together in accordance with the Wales Safeguarding Procedures 2019 [Social care Wales \(safeguarding.wales\)](#), and supplementary guidance Safeguarding Children: [Safeguarding Children: Working Together Under the Children Act 2004](#)

Complex and organised abuse is defined as abuse involving one or more abusers, and a number of related or non-related abused children. It can take place in any setting. The abusers may be acting in isolation or in concert to abuse children. As previously described, they may be using an institutional framework or position of authority.

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, day care and in other provisions such as youth services, sports clubs, faith groups and voluntary groups.

Children may also be abused via the use of electronic devices, such as mobile phones, computers, games consoles etc., which access the internet, and in particular social networking website. [Safeguarding children from online abuse](#)

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. Agencies should also be alert to the possibility that a child or young person who has harmed another may well also be a victim.

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/non recent abuse.

### **3. General Principles**

Each complex abuse investigation requires thorough planning, good inter-agency working, and attention to the welfare needs of the child victims or adult survivors involved.

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 Joint Investigation Group (JIG) as well as a Strategic Management Group (SMG) may be set up.

There may also be complications from the need for therapeutic input, 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 community provisions such as schools, youth services, sports clubs and voluntary groups. The increase of cases of children being abused using the internet is an added complexity due to the changes in technology. The full extent and complexity of the abuse may only emerge during the course of investigations. Practitioners need to be mindful of this from the onset of the investigations. Due consideration should be given to agencies that need to be involved in the investigation including cross boundary issues.

The complexity is heightened where, as in non-recent cases, the alleged victims are no longer living in the situation where the incidents occurred and/or where the alleged perpetrators are no longer linked to the setting or employment role. Cases of non-recent abuse often come to light when adults disclose abuse, they suffered as children. Such cases should be responded to in the same way as any other concerns. It is important to ascertain if the alleged perpetrator is still working with or caring for children.

Where an allegation involves a post-holder who has a specified role within these procedures, the referral must be reported to an alternative (more senior) manager in line with [Section 5, \(allegations against practitioners and those in a position of trust\) Wales Safeguarding Procedures 2019](#)

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.

Subsequent information generated throughout the investigation should only be shared with practitioners who are relevant to the investigation.

The protection of any children identified as being at risk of harm remains paramount. The investigation should give due consideration to the duty of care and well-being support needs of the alleged offender and the measures needed to safeguard any children who has been identified as potential offenders. These procedures must be implemented in conjunction with Section 5 (allegations against practitioners and those in a position of trust) of the Wales Safeguarding Procedures 2019.

An investigation of organised abuse will be carried out under the auspices of the Gwent Safeguarding Board (GSB) which should be kept informed of its progress. It should be the role of the SMG to liaise regularly with the GSB. However, the GSB should not take any direct role in the management of the inquiry. The lead agency will be the Police while any criminal investigation is taking place, guided by partner agencies regarding wider safeguarding and support matters.

For further guidance see <https://www.app.college.police.uk/app-content/major-investigation-and-public-protection/operation-hydrant/>

#### **4. Referrals - Working with Complex Abuse**

Where there is suspicion of complex abuse, the Social Worker or Police Officer receiving the referral should immediately inform their line manager.

If there is any suspicion that any managers currently employed by a Social Care agency are implicated, or a member of the Police, the matter should be referred to a senior manager and the Designated Safeguarding Person (DSP) in line with the GSB Procedure. [Section 5, \(allegations against practitioners and those in a position of trust\) Wales Safeguarding Procedures 2019](#)

Further advice is available from senior managers. If managers agree that the referral constitutes a complex abuse allegation, the senior Safeguarding Manager and the Detective Inspector should be informed and consulted.

Investigations of complex abuse will be carried out under the auspices of the GSB which should be kept informed of its progress.

This protocol describes the process of events in responding to concerns about potential complex abuse.

#### **5. Initial Strategy Meeting**

The strategy meeting, chaired by a senior manager of Children's Social Care, must take place within 24 hours of receipt of the referral and must be formally recorded.

The strategy discussion/meeting must:

- Assess the information known to date.
- Decide what further information is required at this stage and 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 a plan for the investigation to be presented to the SMG, including resource implications.
- Consider any immediate protective action required.
- Emphasise the importance of confidentiality and that information should only be shared through the agreed communication channels.

This strategy discussion may include the referrer, if appropriate, a legal adviser and anyone else relevant to the discussion. This should be any professional, or anyone with a safeguarding responsibility.

Having considered and discussed the information, those involved in the discussion must, if in their view the suspicion is confirmed, pass the information onto the Head of Children's Social Care and the Detective Chief Inspector, Gwent Public Protection Unit (PPU).

If the meeting decides that the case is sufficiently complex and resource intensive, then a meeting of the Strategic Management Group should be convened.

If the case does not meet threshold to be considered under this protocol, then the investigation will be managed under the normal safeguarding arrangements. Should further information which suggest complex abuse becomes available during investigation then re-consideration of this protocol is needed.

Where the extent of the complexity is unclear, there should be a further meeting arranged to review the progress of the case.

## **6. Professionals who need to be informed**

Once the decision has been taken at the initial strategy meeting to initiate a complex abuse investigation, the Senior Police Officer, and Head of Service for Safeguarding for Children Social Care (members of Strategic Management Group) must be informed. They must inform the Gwent Safeguarding Board Chairperson, the Director of Children Services, Head of the media/press office and senior managers of relevant agencies e.g., designated safeguarding person(s).

## **7. Strategic Management Group (SMG)**

To ensure a co-ordinated response, a Strategic Management Group meeting, chaired by either Children 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 group should comprise of senior staff able to commit resources and will normally include the following:

- Head of Service for Safeguarding for Children Social Care
- Senior Officer for Commissioning
- Assistant Chief Police Officer or Head of Public Protection

- Police Senior Investigation Officer (SIO)
- Senior safeguarding child protection manager
- Senior legal advisor Local Authority and Police
- Crown Prosecution Service
- Assistant Director Education Department
- Head of Safeguarding for Health
- Press Officer
- Other individuals and agencies as appropriate

Immediate line managers of any staff implicated in the allegations of abuse must not be included in the SMG.

The SMG 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 Group (JIG).
- Consideration of any cross-boundary issues and planning of appropriate liaison and sharing of resources.
- Identification of practitioners to manage the investigative process (appropriately trained detectives including SIO and Children Social Care/Operational Manager).
- Development of a communication strategy specifying what information can be shared, with whom and at what stage (this should also include the arrangements for urgent communications during out of hours. A confidentiality agreement must be signed by the SMG, the JIG and, where appropriate, any subsequent partner involved.).
- Organisation of adequate accommodation, including a dedicated incident room, where possible, 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.
- Legal advice including consultation with the Crown Prosecution Service (CPS).
- 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, Sexual Assault Referral Centre (SARC) services, and therapeutic, educational, and practical services).
- Consideration of the therapeutic needs of children and adults.
- Sufficient support, supervision and de-briefing of staff involved.
- Availability of expert advice where necessary.
- Liaison arrangements for inter-agency working.
- Timescales 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.
- Witness support, if relevant.
- Management of community impact.
- Disclosure policy/information sharing.
- Helpline for victims/information line.
- Financial compensation for victims.
- Exit strategy.
- Data security and retention and appointment of disclosure officer.

An individual must be designated to act as coordinator between the SMG and the JIG, usually the Police Senior Investigating Officer or the Children's Social Care lead manager.

The responsibility of the coordinator is to ensure the flow of relevant information between the operational and strategic groups.

A member of the SMG must be identified to update the Case Review Sub Group with significant developments and issues.

The SMG must make arrangements to convene regularly during the investigation to:

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

A dedicated team of Police Officers may be formed to deal with a cross-boundary enquiry, or any other partnership (Social Care, Health, etc) to liaise with other Police forces, local authorities, and health commissioners etc.

The SMG should convene until the CPS has made a charging decision and appropriate long-term safeguarding measures are in place for victims.

The SMG must report in writing to the Case Review Sub Group, so that the group can consider whether a case practice review should be initiated.

An SMG will only be convened once a complex abuse investigation has been agreed, and in such cases, there will always be some form of criminal investigation. Given this, the Police will take responsibility for the dissemination and storage of SMG minutes. Alongside the agreement of the SMG terms of reference, there should be discussion to clarify these arrangements to those involved.

The minutes should be arranged in the following format:

- Time, date, location of the meeting
- Terms of reference
- Persons present
- Apologies
- Details of all individuals subject of the enquiry (genogram)
- Facts and circumstances known to date
- Identified actions
- Parameters of investigation
- Resource 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 will supervise the investigation in line with Police policies and protocols for investigation of serious and complex crime.

The SMG must inform the Gwent Safeguarding Board of the investigation outcome and consideration given to the need for a child practice review.

## 8. Joint Investigation Group (JIG)

The role of this group is to carry out a thorough and transparent investigation and discharge safeguarding procedures and should include:

- A forum for information sharing and to monitor the investigative progress.
- Determining victim interviewing strategy.
- Investigative updates to SMG.
- Resource updates to SMG.
- Consistent support provisions for victims and their families.
- Support provisions for investigation team staff.
- Sharing information with agencies not represented on SMG.
- Compliance with information sharing and confidentiality protocol.
- Instigate this protocol and implement the policies and procedures laid out by SMG.

This group led by the Police Senior Investigating Officer, or their deputy should include representative from Children Social Care, Education, Health and Local Authority legal services. Other agencies should be invited as appropriate.

The size of the group will depend on the scale of the investigation, but in the majority of cases both PPU and Children's Social Care should provide a line manager and sufficient staff experienced in interviewing children and trained in [Achieving Best Evidence in Criminal Proceedings](#).

Membership may also be drawn, as necessary, from appropriate Health professionals, Education, CPS, Legal Services, Probation, and victim support services.

In selecting staff, consideration should be given to requirements arising from the individual needs of the relevant child/children, i.e., gender, culture, race, language, and where relevant, disability/special needs.

Any breach of confidentiality (deliberate or unintended) must be reported immediately to the SMG so that they can address this issue and manage the actual or potential impact on the investigation.

## 9. Operational Group

The Operational Group will be responsible for:

- Planning the overall investigation, including record checking, evidence gathering, planning, and undertaking a series of interrelated interviews, and any surveillance required.
- Considering the implications of crossing geographical boundaries.
- Maintenance of written records of regular strategy and operational meetings.
- Holding planning meetings for individual pieces of work, e.g., video interview of a child and/or action to protect a child.
- Gathering other evidence including forensic evidence, interviews with alleged abusers and witnesses, and other corroborative evidence. Communication and liaison with other agencies on a need-to-know basis. There should be no deviation from the SMG's existing communication strategy without the prior approval of the SMG.
- Convening inter-agency meetings and/or child protection conferences as appropriate.
- Coordination and timing of therapeutic services
- Regularly updating the SMG on the progress made and recommending when to close the investigation.
- Consideration of arrangements for court hearings and support to children and families.
- Recommendations as to the placement of children and any contact involving children and their siblings, relatives, or other adults.

This group led by the Police Senior Investigating Officer, or their deputy should include representatives from children social care education health and local authority legal services. Other agencies should be invited as appropriate.

The size of the group will depend on the scale of the investigation, but in the majority of cases both PPU and Children's Social Care should provide a line manager and sufficient staff experienced in interviewing children and trained in [Achieving Best Evidence in Criminal Proceedings](#). From a police perspective, the investigators should also hold a Serious and Complex Child Abuse Investigator's Portfolio.

In selecting staff, consideration should be given to requirements arising from the individual needs of the relevant child/children, i.e., gender, culture, race, language, and where relevant, disability/special needs.

Any breach of confidentiality (deliberate or unintended) must be reported immediately to the SMG so that they can address this issue and manage the actual or potential impact on the investigation.

The team members must be independent from any of the parties that are the subjects of the investigation.

Personnel seconded to the Operational Team should be dedicated to the investigation and have no other responsibility.

## Practical Arrangements

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

Appropriate facilities must be available for video interviews in line with *Achieving Best Evidence in Criminal Proceedings* and paediatric assessment. [\*Achieving Best Evidence in Criminal Proceedings\*](#).

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

## 10. Access to records

One of the most difficult issues in complex abuse investigations relates to the locating, use, management, and disclosure of documentary information relevant to the investigation. The investigative team should consider what information is required and take steps to secure it within each agency.

Agencies should be made aware that they should share files in line with statutory duties, legal requirement, or data protection, this includes information on personal files, personnel files, e-mails, general establishment records and registers.

Where vital information may have been lost, damaged, or destroyed, consider alternative methods to obtain information from known or potential witnesses and victims. Record findings on a database.

## 11. Information sharing

These 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 of information sharing should be applied to all complex abuse investigations and team members should be familiar with its provisions.

The need to maintain the integrity of shared information is vital, and all investigative staff must be aware and comply with the principle and proportionality of GDPR. 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 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 children.

Where members of the investigation team receive such information the appropriate duty to report form should be submitted for multi-agency safeguards this should be for the area in which the victim(s), potential victims and offender and offenders reside.

Further detailed guidance in this issue, together with advice on disclosure of material is contained in <https://www.app.college.police.uk/app-content/major-investigation-and-public-protection/child-abuse/complex-investigations> for further advice and guidance see <https://www.app.college.police.uk/app-content/major-investigation-and-public-protection/child-sexual-exploitation/>

## **12. Crossing geographical and operational boundaries**

It may be recognised at the outset or during the investigation that there are suspected or potential victims and offenders in more than one geographical area.

At the outset, the responsibility for managing the investigation lies with Police in the area where the abuse is alleged to have occurred – where the alleged perpetrator/s are alleged to operate – who will make necessary contact with other affected areas through the SMG (unless exceptional circumstances apply, e.g., online offences or kidnapping).

Once it is recognised that there are suspected or potential victims outside of Gwent, the decision will be made by the JIG as to which agencies are informed and as to how evidence is gathered.

The initiating JIG and Operational Team should undertake the investigation on behalf of the other geographical areas.

If the number of victims outside the geographical boundaries of the original JIG increases to the extent that it cannot respond, negotiations should take place for a JIG with Police and Social Care in the new geographic area.

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

The Local Authority with responsibility for the complex abuse case would be the Local Authority in which the abuse takes place.

A senior manager from each additional area should join the SMG to discuss and agree any resource implications involved.

### **13. End of Enquiry**

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

Practitioners 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.

The SMG should have a final meeting where concluding information and debriefing can be shared. An overview report should be compiled and presented to the Gwent Safeguarding Board.

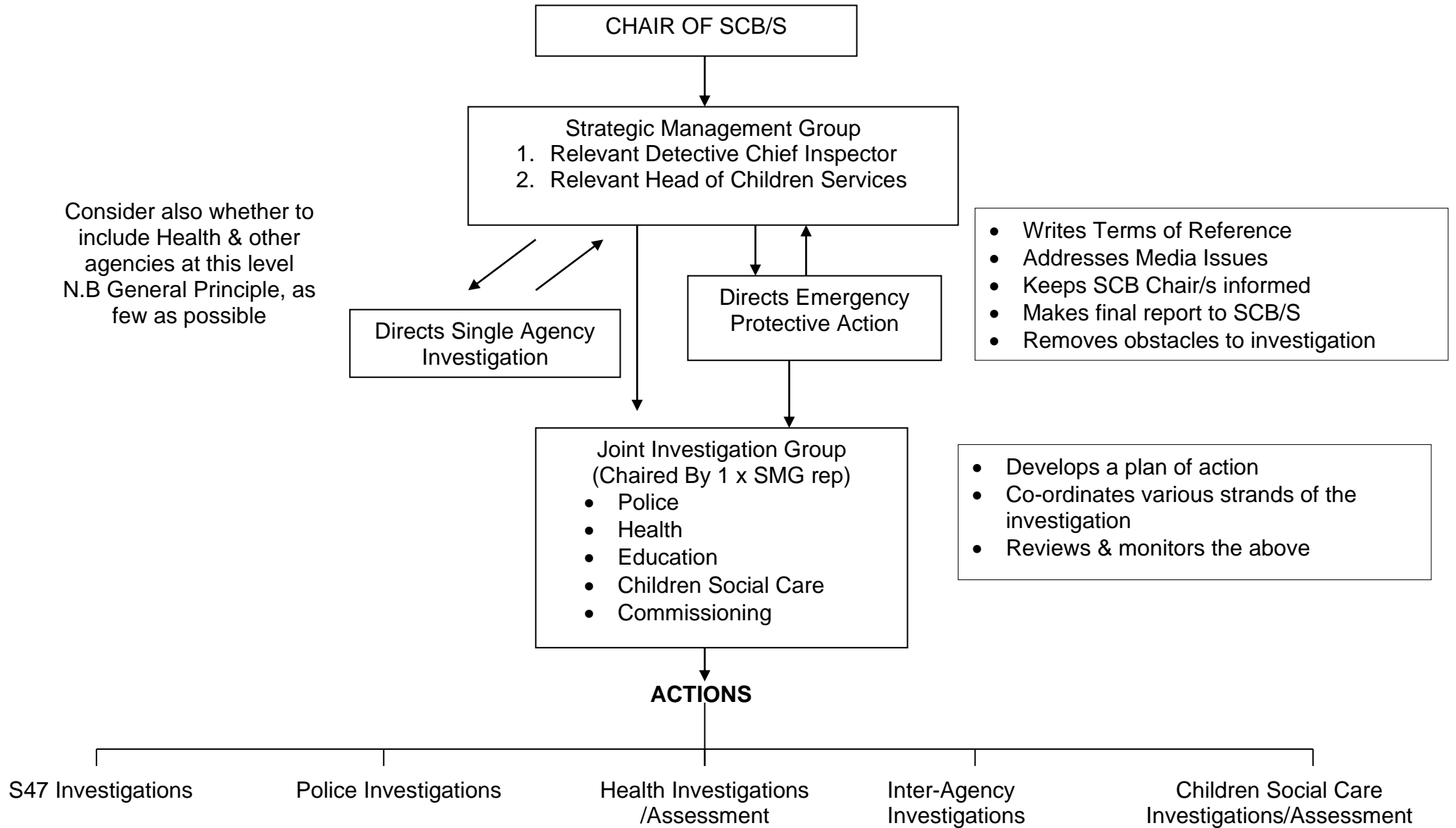
The storage, security and retention of the files relating to the investigation must be detailed. Access to such records may well be necessary in relation to any on-going appeals, civil proceedings, or applications for compensation. This must be compliant with Management of Police Information and GDPR.

At the conclusion of an enquiry/investigation, the SMG should consider whether an evaluation of the investigation should take place so that lessons learned can be identified. Such a review will complement any case practice review that may be concurrent or have been completed.



Appendix 1

**PROCESS FLOWCHART FOR COMPLEX INVESTIGATIONS**



**Appendix 2**

**PROGRESS REPORT TEMPLATE** *(To be completed by the Joint Investigation Group to inform Senior Management Group)*

**Summary of Evidence** - this should include a relationship matrix of who has done what to whom and what the relationship is, examples of which could be genograms, I2 charts, eco map, family systems and connections

**Summary of Corroboration**

**Additional Victims/Perpetrators Identified**

**Actions taken to date and date of completion**

**Identify next steps and actions to take**

**Appendix 3**

**IDENTIFICATION TEMPLATE OF CHILDREN OF CONCERN IN THE INVESTIGATION**

I.D. NUMBER	CHILD'S NAME & D.O.B	CHILD'S LEGAL STATUS	PARENTS/CARERS NAME & D.O.B.	HOME ADDRESS	KNOWN ASSOCIATIONS TO THE ALLEDGED PERPETRATORS	ACTION TAKEN I.A./S.47	NATURE OF DISCLOSURE	CASE OPEN/CLOSED & TO WHICH TEAM