

- Staff should be trained to operate an age verification scheme, know what types of identification are acceptable and to recognise signs of proxy purchase of alcohol.
- Staff training records should be maintained.
- Activity at the premises should be monitored (for example using CCTV or by regular patrols. Patrol records should be maintained.)
- 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 premise, it is important to follow a consistent and auditable protocol – for further advice about this contact the Bromley Safeguarding Children Board.
www.bromleysafeguarding.org
- If you have a delivery service (for example hot food or alcohol) enforce a Code of Conduct to promote good safeguarding when deliveries are made to unaccompanied children.

What to do if you have concerns about child sexual exploitation

- If you have concerns, contact the **MASH** (multi-agency safeguarding hub) team on **(020) 8461 7373 / 7379 / 7026 out of hours (020)8464 4848** or send a referral form (download at www.bromleysafeguarding.org) to email mash@bromley.gov.uk
- You can contact the NSPCC helpline on **0808 800 5000**
- If you wish to remain anonymous, contact Crimestoppers on **0800 555 111** or report online at <https://secure.crimestoppers-uk.org/ams.form.anonymous.asp>

Remember

**“SAY SOMETHING IF YOU SEE SOMETHING”¹,
under the Licensing Act 2003 your premises licence may
be at risk if you do not take action to protect children**

¹ National awareness campaign, Children's Society 2012

Child Sexual Exploitation Information for people working at licensed premises in Bromley



What are your responsibilities working in the licensed trade?

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. The guidance issued under Section 182 of the Licensing Act 2003 requires that children must be protected from “physical, psychological and moral harm”. Therefore premises allowing persons under the age of 18 are expected to have systems in place to safeguard children and young people.

One of the risks associated with licensed premises could be sexual exploitation. To minimize the risk to children and young people, premises need to have preventive systems in place. There may also be a financial and reputational risk, particularly if legal action is taken against a premises, which can result in the suspension or revocation of the licence. So it is important that the risk of child sexual exploitation is managed at your premise ~ to protect children and young people from harm ~ and to protect your business.

What is child sexual exploitation?

The definition of child sexual exploitation in statutory guidance for England is, “Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.”

How might this involve licensed premises?

Licensed premises are places where people usually go to socialise, have a drink, relax and enjoy themselves and as such can 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 premises could be misused for this kind of activity by the people who are socialising or working there. For example:

- Adult venues (such as night clubs/sexual entertainment venues) may attract groomers if the premise is frequented by children or young people.
- Where underage drinking takes place, children and young people are at risk as their judgement is impaired.
- 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), present risks if a groomer is employed there (or works voluntarily) and has regular or private contact with children.
- Children and young people are vulnerable in areas of premises that are not supervised or security checked (for example toilets, beer gardens, play zones).
- Risks may be present at premises where information technology equipment is used (for example, internet access, mobile phones) as social media can be used to groom vulnerable young people; 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, may be used for child sexual exploitation.

Risk management and due diligence

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 any risks. Here are some suggested 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. And review at least yearly.
- Staff should be trained to recognise indicators of child sexual exploitation and know how to report concerns.