

## **Missing, Sexually Exploited or Trafficked (MSET) Intelligence Group**



## **SSCB MSET REFERRAL FORM & MULTI-AGENCY CSE RISK MEASUREMENT TOOL**

## GUIDANCE NOTES

This document should be used by professionals to evaluate the level of risks faced by a young person and whether to make a referral to the SSCB Missing, Sexually Exploited and Trafficked (MSET) Intelligence Group. It is intended to define whether a young person is at 'high', 'medium' or 'lower' risk of Child Sexual Exploitation (CSE). This will allow partners to develop a better understanding on the prevalence and nature of CSE across Sunderland and provide a more consistent approach. It will also provide a means of measuring whether the risk to a young person is increasing or decreasing and therefore put effective measures in place to try to manage this.

A 'lower' risk score does NOT mean that no action needs to be taken, as the effective early intervention can improve the chances of a young person slipping further into sexual exploitation, or even prevent it from happening. Even for cases not ultimately referred into the MSET, the information contained on this form should be shared with all relevant agencies and the young person flagged as appropriate.

This tool is NOT a screening tool – it is designed to measure the level of risk of CSE once some indicators have already been spotted, however the subtle indicators of CSE can often mask significant abuse and there should be a low threshold when considering whether to complete an assessment or not and local knowledge/shared information is vital in identifying indicators of CSE which would otherwise be overlooked e.g. identity of places of risk.

The tool should be completed for ALL young people referred to children's social care showing indicators of CSE. The document should be completed in consultation with partners, to ensure that all relevant information is shared, and **in discussion with the young person themselves so that their wishes, level of understanding and willingness to engage is considered**. When a young person is hard to engage the person with the best relationship with them should lead the work with oversight from the social worker – remember that sexually exploited children are victims of abuse, even if they don't see it as such.

The tool should be repeated whenever incidents occur which could change the level of risk to the young person and also as and when directed by MSET meetings, e.g. it may be appropriate for some young people to repeat scoring process every three months as a matter of course. All completed versions should be retained and not overwritten so that the risk to the young person can be monitored over time. The tool should enable professionals to be able to show that they have reduced the risk to an individual as part of their exit strategy. Interventions which appear to help lower the risk to individual young people should be shared with the MSET so that they can be considered for other young people.

**Normal safeguarding procedures should be followed by agencies where there are urgent concerns.**

## HOW TO COMPLETE THE TOOL/REFERRAL FORM

The tool is broken down into 11 main categories with a separate section for professional judgement. The scores are then added together to provide a RAG rating of risk. The first page of the document provides a summary of the scores and a guide as to whether the score has increased or decreased over time if appropriate.

The professional completing the tool should go through it with the young person to find the description that best suits their current situation. For example: Section 1 – Episodes of missing from home or care – if there have been no missing episodes then circle (1) and write the score of (1) on the corresponding section on the front summary page. You can then record further detail, observations or intelligence in the box marked “child and assessor’s comments”. Continue with the rest of the questions until all 11 are complete. Use all of the information contained and also the wishes and feelings of the young person and insight offered by partner agencies to complete the Professional Judgement section and provide an analysis of what this tells you as a professional.

It is vital that all practitioners present themselves as at ease with whatever a young person might want to say or disclose in particular young person may not understand their own sexuality or gender identity. A young man may have been coerced into sex with men but yet not think themselves as gay, alternatively a young woman considering their lesbian or bisexual identity may have been coerced into sex with men who have convinced them this might ‘cure’ them of their desire for women. Practitioners should consider asking whether there are any persons supportive of the sexuality/gender identity

Remember that all children can be sexually exploited, but some are more vulnerable due to the existence of circumstances which could leave them more vulnerable to being preyed on or exploited and behaviours exhibited should not be taken as lifestyle choices. A breakdown of some of these vulnerability factors is included on page 12 of this document. These vulnerability factors should be considered when analysing your perceived risk to an individual in the Judgement section. It is important to remember that children without pre-existing vulnerability factors can still be sexually exploited. You should then provide a score of 1-10 (with 10 being a higher risk) and also carry this forward to the first page summary sheet.

When all the scores from the 11 categories are added together with your score for professional judgement you will then have a total score of 11-65 and this will then enable you to determine the RAG rating:-

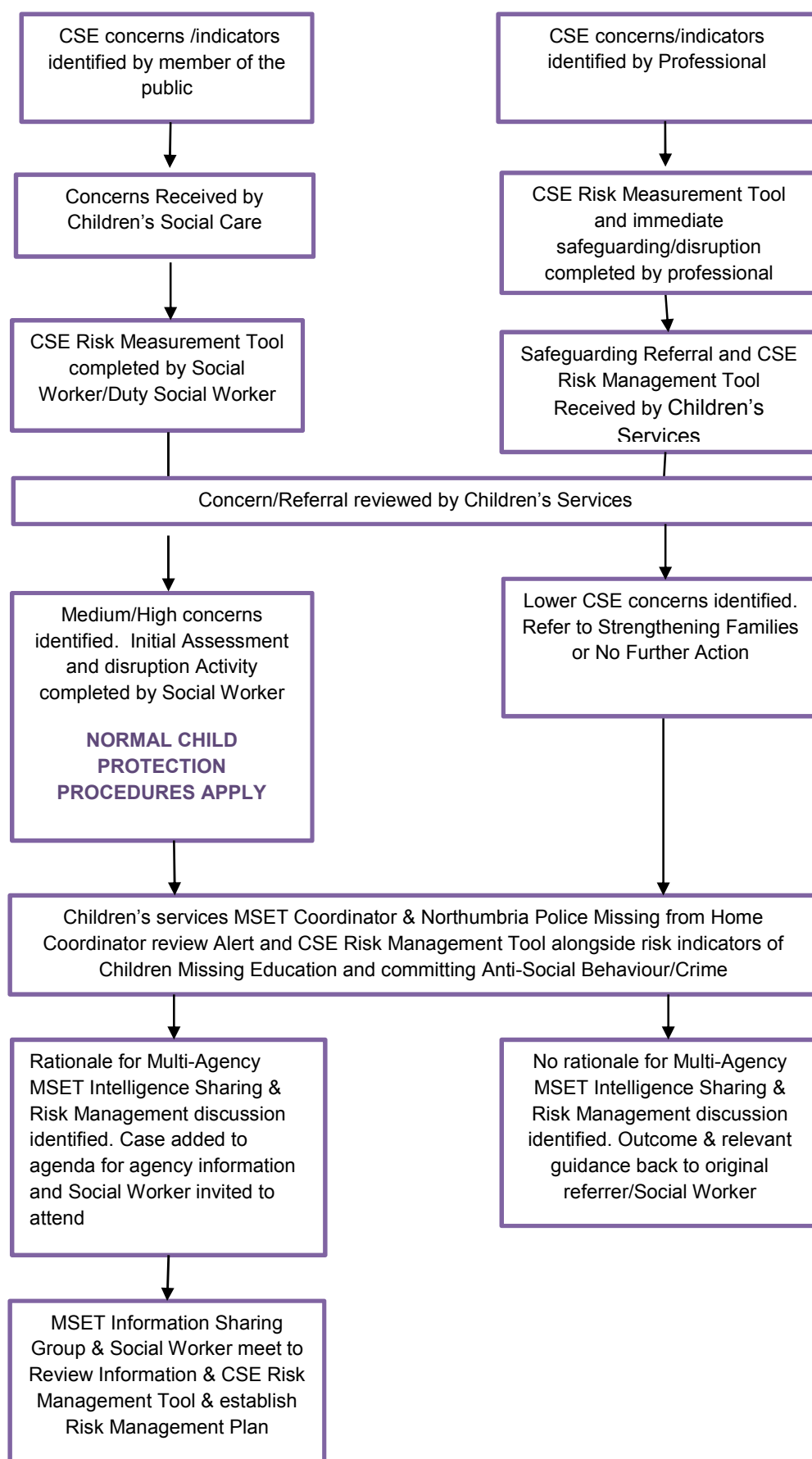
- **Score 41 – 65**                      **High Risk**
- **Score 21 – 40**                      **Medium Risk**
- **Score 11 – 20**                      **Lower Risk**

There are also sections to complete on protective factors and a disruption plan. Protective factors should include parents’ and carers’ views and any positive engagement. The disruption plan should detail what immediate steps have been taken and what specific interventions need to happen to decrease risk and improve the safety of the young person.

All criminal matters should be referred immediately to the police but other orders can be considered to restrict the liberty of persons seeking to exploit young persons and a list of some considerations can be found at page 14 of this document. .

Completed forms should accompany the referral of concern to Sunderland Children’s Services and a copy e-mailed securely to [MSET@sunderland.qcsx.gov.uk](mailto:MSET@sunderland.qcsx.gov.uk) and any relevant information should also be shared with the police at [forceintelligence@northumbria.pnn.police.uk](mailto:forceintelligence@northumbria.pnn.police.uk)

## SSCB CHILD SEXUAL EXPLOITATION FLOWCHART



**Missing, Sexually Exploited or Trafficked (MSET) Intelligence Group**  
**REFERRAL FORM & MULTI-AGENCY CSE RISK MEASUREMENT TOOL**

Young Person's Information									
Name:							D.O.B.		
Is the child in any of the following categories? (Please tick)	LAC		CP		CIN		CAF	L/Care	
Address									

Referrer			
Completed by		Contact Number	
Agency & Job Title			
Date Completed		Date Referred	
Reason for completing form	i.e.: Review of risk dated **/**/**** or detail of incident leading to assessment		

Indicator	Score	Indicator	Score
1. Episodes of missing from home/care		6. Ability to identify abusive/exploitive behaviour	
2. School/college attendance		7. Engagement with appropriate service	
3. Misuse of substances		8. Sexual Health	
4. Parent/carer – young person relationship		9. Association with risky peers/adults	
5. Accommodation		10. Social Media (internet / mobile etc)	
11. Other issues		<b>Sub Total</b>	
Professional judgement score:		<b>Overall score</b> (total from 11 categories plus professional judgement score)	

RAG Rating			
<b>High (41 – 65)</b>		<b>Medium (21 – 40)</b>	
		<b>Lower (10 – 20)</b>	

Circle/highlight either 1,2,3,4 or 5 on each of the 11 categories which best describe the current situation for the young person. The score for each section should be recorded on the front summary page and added to the score you give for professional judgement, which will give an overall total

1. Episodes of missing from home/care		
Score	Indicator	Evidence Child and assessor's comments - Times missing? Where do they go? Why do they go? Is carer aware of missing episode?
1	No missing episodes.	
2	Stays out late, no missing.	
3	Occasionally goes missing, whether for short or prolonged episodes	
4	Frequent and short missing episodes	
5	Frequent and prolonged missing episodes	

2.School/College attendance		
Score	Indicator	Evidence Child & assessor's comments
1	Engaged / re-engaged in education or training, or in work or actively seeking employment	
2	Is participating in education or employment <b>but attendance is a concern</b> . Education could include: <ul style="list-style-type: none"> <li>On a roll at a school or PRU</li> <li>On a roll at a school or PRU with alternative provision in place</li> <li>On roll at a college</li> <li>Employed with training</li> </ul>	
3	Young person is on a reduced timetable, or persistently absent from school, or there is a sudden noticeable change in attendance, performance or behaviour at school	
4	Young person is excluded from school with no planned provision, or a NEET (not in education, employment or training) but where the young person is <b>showing an interest in accessing opportunities</b> .	
5	Young person is not attending school or is a NEET and <b>shows no interest</b> in accessing educational or training opportunities.	

### 3. Misuse of drugs or alcohol (including use of “legal highs”)

Score	Indicator	Evidence Child and assessor's comments - Where do they take them? How do they fund it? Who with? Type / class of substance?
1	No concerns	
2	Some concerns about drugs or alcohol (or cigarettes in younger children)	
3	Uses drugs or alcohol– increasing concerns	
4	Alcohol/drug dependency suspected	
5	Young person is dependent on alcohol / drugs. Known / disclosure or appears dependent on alcohol/ drugs.	

### 4. Parent/Carer – Young Person Relationships

Score	Indicator	Evidence Child & assessor's comments
1	Parent/carer and young person have a positive relationship and communicate effectively. Carer demonstrates emotional warmth and provides stability for young person. Young person responds to boundaries.	
2	Parent/carer and young person generally have a positive relationship. Appropriate boundaries are in place. The young person does not always adhere to them.	
3	Sudden negative change in quality of relationship, or relationship between parent/carer and young person is strained	
4	Historic abuse in family (emotional, neglect, physical or sexual) or poor or negative communication with young person not responding to boundaries	
5	Current / suspected abuse in family (emotional, neglect, physical or sexual) or poor communication, low warmth, attachment or trust. Parent/Carer does not implement age appropriate boundaries.	

### 5. Accommodation

Score	Indicator	Evidence Child & assessor's Comments
1	Young person & assessor are satisfied accommodation meets the young person's needs i.e.: the environment is a stable place where the young person feels safe.	
2	Young person & assessor are generally satisfied with accommodation and accommodation meets most of the needs of young person, or there are some concerns about longer term stability.	
3	Unstable or unsuitable accommodation. Young person & assessor are not satisfied where the young person is living, or recent placement change	
4	Frequent placement changes	
5	Temporary accommodation /sofa surfing /homeless	

## 6. Ability to identify abusive/exploitive behaviour – both young person & parent/carer

Score	Indicator	Evidence Child & assessor's comments
1	Young person has a good understanding of exploitative / abusive behaviour and can use it to keep themselves safe	
2	Reasonable understanding of abusive/exploitative behaviour	
3	Some understanding of abusive/exploitative behaviour. May recognise risks in theory or risks to their peers but cannot apply it to keep themselves safe.	
4	Very limited recognition of abusive/exploitative behaviour	
5	No recognition of abusive/exploitative behaviour, or parent/carer cannot identify or recognise the risk of abuse or exploitation	

## 7. Engagement with appropriate services

Score	Indicator	Evidence Child & assessor's comment
1	Good engagement with all appropriate services	
2	<ul style="list-style-type: none"> <li>Reasonable engagement with all relevant services, or</li> <li>Good engagement with a single service provider but less so with others</li> </ul>	
3	Some engagement with services, occasional contact.	
4	Brief engagement with service: early stages or sporadic contact	
5	Not engaging with service / no contact	

## 8. Sexual health activities and awareness

Score	Indicator	Evidence Child & assessor's comments
1	Is not sexually active but is aware of where to get support and advice when needed. No concerns re: sexual health	
2	Young person is sexually active and in an equal consensual relationship with a peer. Young person does not feel pressured, they feel they can say 'no' and is following 'safe sex' advice.	
3	Is not sexually active but is feeling pressured to become sexually active, or there are some sexual health concerns	
4	Young person is sexually active but is not receiving support from any sexual health services.	
5	<ul style="list-style-type: none"> <li>Young person feels pressured to have sex or to perform sexual acts in exchange for status, protection, possessions, substances or affection, or</li> <li>Young person is in a sexual relationship with an adult or there is a wide age gap, or</li> <li>Young person is under 13 and sexually active, or</li> <li>Young person has many sexual partners /many tests for STIs or pregnancy, or</li> <li>Sex is non-consensual – young person is experiencing violence or coercion with sex, or are unable to consent due to intoxication, or Young</li> </ul>	



	person is made to watch sexual acts being performed on others.	
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## 9. Association with gangs/criminals or adults and peers who pose a risk

Score	Indicator	Evidence Child and assessor's comments - <i>In this context 'risky' means that they either present a direct risk to the young person (i.e. in terms of domestic abuse / physical violence or sexual abuse / exploitation) or they are likely to draw the young person towards other adults / peers who present this risk.</i>
1	Young person not at risk. May have some contact with vulnerable peers but has other positive networks.	
2	Young person is aware of gang activity in their area but is not actively involved.	
3	Young person socialises with vulnerable peers or is in contact with peers who pose a risk	
4	Young person is in contact with risky adults. They are developing an awareness of risks/exploitation but contact has <b>not</b> significantly reduced	
5	Young person is known to be habitually associating with risky adults and/or peers and does not act on this, or young person is actively involved with a gang or criminal group or associated to gang members through peers or family.	

## 10. Social Media (Internet and mobile usage)

Score	Indicator	Evidence Child & assessor's Comments
1	Young person uses the internet and/or has an instant messaging account e.g. Whatsapp, BBM, Snapchat etc. They have good awareness of potential risk/danger of internet use and there are suitable parental controls in place	
2	Young person has accessed one or more social networking sites and may have links to, or is 'friends' with numbers of unknown people (i.e.: doesn't know them in real world)	
3	Some concerns about risk of grooming, including unmonitored/secretive use of internet, texts/calls/messages from unknown people or in possession of a mobile phone which parent/carer has no or limited knowledge of.	
4	Young person proactively exposes themselves to online dangers and grooming– e.g. regularly posts inappropriate images of themselves online unprompted or use of dating sites NB particular note should be made of sites such as <b>Tinder, POF, Grindr, Gaydar &amp; Pink Sofa</b>	
5	Young person has posted inappropriate language/information/sexual pictures when contacted by an adult/older peer/unknown person. Does not acknowledge the risks of this, or plans to meet face to face person they only know online	

11. Other concerns		
Score	Indicator	Evidence Child & assessor's comments
1	No other known issues	
2	One or more of the following: <ul style="list-style-type: none"> <li>Issues with physical health including issues under the care of a hospital consultant and issues self-managed with support of parent/carer</li> <li>Disclosure of physical assault followed by withdrawal of complaint</li> <li>Found at locations of concern linked to CSE</li> </ul>	
3	One or more of the following: <ul style="list-style-type: none"> <li>Mental and emotional health issues including low self-esteem, low mood, anxiety, suicidal ideation, eating issues, diagnosed mental illness</li> <li>Clipping .e. offering to have sex with the intention of robbing the victim then running before sexual activity</li> <li>Unaccounted monies and/or possessions such as clothing, accessories</li> </ul>	
4	One or more of the following: <ul style="list-style-type: none"> <li>Begging (where there are known/suspected links to other people and/or substances)</li> <li>Self-harm and/or suicide attempts</li> </ul>	
5	Concerns that the young person is being bought/sold/trafficked NB trafficking does not just include travel across international borders, it can involve transportation within the UK and locally for the purposes of exploitation	

**Consultation – this risk assessment must be carried out in consultation with the young person involved and multi-agency partners**

**Young Person's view of the risks and their wishes and feelings**

**Parent's or Carer's views**

**Other professionals involved in completing this form and additional comments**

Name	Designation	Additional comments

**Please provide details of any professionals you have chosen not to consult with and why:**

**Protective factors (please include any positive engagement with young person, including indirect engagement with parents/carers)**

**Professional judgement (please score this section 1-10, with 10 being a higher risk, and carry the score forward to your overall score).**

*Use this section to provide an analysis of what the information that you have from all agencies is telling you about the young person and their life. Highlight any concerns that have been raised which add to their vulnerability such as recent bereavement, domestic abuse, learning disabilities etc. Also, please reference any previous referrals (even if NFA).*

**Score:**

#### **Disruption plan**

<b>What specific intervention needs to happen to decrease risk and improve safety</b>	<b>By who?</b>	<b>By when?</b>	<b>Progress to date</b>

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## Factors to consider when applying the Scoring Matrix

This list is not exhaustive or exclusive to CSE and is for guide purposes only:-

Indicator	Factors To Consider (those * are a criminal offence and require reporting to the police)
Missing from Home/Care	<ul style="list-style-type: none"> <li>• Abducted or forced imprisonment*</li> <li>• Regularly coming home late or going missing (whether reported or not).</li> <li>• Returning home after long periods appearing well cared for.</li> <li>• Is evasive about who they were with when missing and where they have been/activities engaged in.</li> </ul>
Child's Presentation	<ul style="list-style-type: none"> <li>• Changes to physical appearance i.e. new clothes, more/less makeup</li> <li>• Overt sexualised dress</li> <li>• More secretive/withdrawn or isolated from peers or not mixing with usual friends</li> <li>• Increasingly disruptive, hostile or physically aggressive at home or school including sexualised language</li> </ul>
Gang Association	<ul style="list-style-type: none"> <li>• Association with gangs</li> <li>• Fear of victimisation from other gangs</li> <li>• Constrained by gang rules</li> <li>• Fear of gang leaders</li> </ul>
Associates	<ul style="list-style-type: none"> <li>• Displaying signs of harassment/unwanted attention</li> <li>• Unusual associations with others, particularly groups of adults.</li> <li>• Entering/leaving vehicles with unknown adults</li> <li>• Introducing peers to CSE adults</li> </ul>
Social Media	<ul style="list-style-type: none"> <li>• Concealed/concerning use of the internet including web cam and online gaming.</li> <li>• Use of social media</li> <li>• Social media accounts</li> <li>• Evidence of sexual harassment through social media/networking sites *</li> </ul>
Lifestyle	<ul style="list-style-type: none"> <li>• Association at known CSE hotspots</li> <li>• Involved in criminal activity</li> <li>• Unexplained amounts of money, mobiles, credit, clothing, jewellery or other items/gifts</li> <li>• Having multiple phones or sim cards or use of a phone that suggests concern e.g. multiple callers or texts, increase in messages, conceals phone and usage.</li> <li>• Possession of hotel keys/cards of keys to unknown premises</li> <li>• Being taken to/visiting brothels/massage parlours</li> <li>• Frequenting areas known for on/off street sex work</li> </ul>
Family and Personal Relationships	<ul style="list-style-type: none"> <li>• Reports of being taken to hotels, nightclubs, takeaway or out of areas by unknown adults</li> <li>• Associating/relationships with significantly older men or women who encourage emotional dependence, loyalty and isolation from safe relationships</li> <li>• Physical or emotional abuse by boyfriend/girlfriend or controlling adult including manipulation, violence and/or threats</li> <li>• Associating with other sexually exploited children</li> </ul>

	<ul style="list-style-type: none"> <li>• Evasive/concealing new relationships</li> <li>• Parents fail to understand or actively manage risks.</li> <li>• Lack of positive relationships with protective/nurturing adult</li> <li>• Recent experience of loss/bereavement</li> <li>• Distancing themselves from social or support networks including family and friends</li> <li>• Child is unsure about their sexuality and/or their gender identity, unable to disclose this to their families, friends, communities and/or have experienced sustained homo-bi-transphobia</li> <li>• Historic or current concerns about neglect, witnessing domestic violence, physical or sexual abuse.</li> <li>• Forced marriage/honour based violence/familial sexual abuse*</li> <li>• Family history of exploitation or prostitution</li> <li>• Bullies others or and/or is a victim of bullying</li> </ul>
<b>Physical, Sexual, Mental Health</b>	<ul style="list-style-type: none"> <li>• Increased health/sexual health related problems, including of complaining of illness without physical cause</li> <li>• Marks or scars of physical injuries on the body which they try to conceal</li> <li>• Expressions of despair e.g. depression, mental ill health, suicide thoughts, attempts, overdose, eating disorder</li> <li>• Increase in self harming behaviour</li> <li>• Branding type marks on body i.e. gang logos</li> <li>• Repeat or unplanned pregnancy or pregnancies</li> <li>• Under 13 engaging in penetrative sex with someone over 15*</li> <li>• Under 18 engaging in unwanted sexual activity*</li> <li>• Sexually Transmitted Infections</li> <li>• Sexualised risk taking (including on internet or mobile such as texting, sending explicit messages or photos)*</li> <li>• Young gay/bisexual exploring sexuality in an unsupported way</li> <li>• Disclosure of sexual/physical assault followed by withdrawal of allegation</li> <li>• Reports of being taken to hotels, nightclubs and engaging in sexual activity</li> <li>• Sexual exploitation has been identified previously as a concern</li> </ul>
<b>Drug, Alcohol</b>	<ul style="list-style-type: none"> <li>• Increase use of drugs or alcohol</li> <li>• Current substance/alcohol misuse in family</li> <li>• Limited financial means to support substance/alcohol use</li> </ul>
<b>Education attendance, punctuality and attainment</b>	<ul style="list-style-type: none"> <li>• Exclusion from school</li> <li>• Unexplained absences</li> <li>• Not engaging in ETE/behaviour changes in school</li> <li>• Missing from education</li> </ul>
<b>Accommodation stability and suitability</b>	<ul style="list-style-type: none"> <li>• Living in a chaotic or dysfunctional household</li> <li>• Poor home conditions</li> <li>• Homelessness</li> <li>• Sofa surfing</li> <li>• Unable to access home for significant periods during the day or night.</li> </ul>

## Response & Disruption Plan Considerations

Securing prosecution and conviction must be the absolute priority against adults committing serious sexual offences upon children. However where there is grooming, low level harassment or other behaviour which suggests a risk of CSE, civil remedies are available to the police and local authorities.

These include remedies which specifically relate to sexual offences or grooming and other wider nuisance and anti-social behaviour injunctive and closure powers. These powers are important not only as methods of disruption or prevention. They also function as a trail of concern to be used in subsequent prosecutions, providing third party evidence.

### CIVIL REMEDIES

**A Child Abduction Warning Notice<sup>1</sup>** authorised by a child's parent and issued by the police (or the local authority in the case of a looked after child aged 16-18) warns a suspected perpetrator to stop associating with a named child. As such, the adult is made aware that a concern has been raised about the relationship and that authorities are watching.

Abduction Notices can be used as evidence in criminal proceedings that the adult knew the age of the child, which is clearly stated on the warning notice. Moreover, breach of an Abduction Notice can become grounds for the issuing of the new Sexual Risk Order.

There are new powers introduced by the Anti-Social Behaviour and Crime and Policing Act 2014<sup>2</sup>:

**The new Sexual Risk Order<sup>3</sup>** (SRO) can be issued against an individual who has 'done an act of a sexual nature which suggests that they pose a risk of harm to the public in the UK or children and vulnerable adults abroad'.

An 'act of a sexual nature' has not been defined in the legislation and the guidance states this 'will depend to a significant degree on the individual circumstances of the behaviour and its context', which means this order may be used by police and the NCA to disrupt grooming activity. An SRO lasts a minimum of two years and has no maximum duration. Breach of an SRO is a criminal offence, which can attract a term of imprisonment of up to five years.

**The new Sexual Harm Prevention Order<sup>4</sup>** (SHPO) can be made against a person who has been convicted or cautioned in relation to a sexual offence to protect any members of the public in the UK, or vulnerable adults and children abroad, from sexual harm, including protecting children from grooming activity.

The SHPO must be made for a minimum of 5 years and can be made for an indefinite period if necessary. The order can contain any prohibitions aimed at protecting children and others. Breach of a SHPO is a criminal offence, which can attract a term of imprisonment of up to five years

**Closure notice:** The police can issue a closure notice in respect of premises which they have reasonable grounds for believing have been, or are likely to be, used for activities related to specified child sex offences. The changes mean that closure powers will now capture a wider range

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<sup>1</sup> Section 2 Child Abduction Act 1984; Section 49 Children's Act 1989.

<sup>2</sup> The Anti-social Behaviour and Crime Policing Act 2014 came into effect on 8 March 2015.

<sup>3</sup> Sexual Risk Orders replace Risk of Sexual Harm Orders

<sup>4</sup> Anti-social Behaviour and Crime Policing Act 2014

of offences relating to child sexual exploitation and the police will be able to take proactive action if they believe the premise is going to be used for child sex offences.

**Child sexual exploitation at a hotel – requirement to disclose information or comply with notice served by police:** A police officer can serve a notice on a hotel requiring them to disclose the names and addresses of guests where there is reason to believe there is child sexual exploitation. Failure to comply is a criminal offence.

## **TOOLS AND POWERS TO TACKLE NUISANCE AND ANTI-SOCIAL BEHAVIOUR**

The following gives an overview of some of the tools currently available to councils and police in relation to nuisance and anti-social behaviour:

- § **Civil injunctions** under the Anti-Social Behaviour, Crime and Policing Act 2014 (previously Anti-Social Behaviour Orders, ASBOs). These are civil orders which replace the powers previously available to councils through ASBOS and Housing Act injunctions.
- § **Closure Orders** associated with Nuisance and Disorder. Closure orders are civil orders available in the Magistrates Court which stop anyone entering or residing at a named property. There are three types of closure order - drug closure orders, brothel closure and anti-social behaviour closure orders.
- § **Section 222 Local Government Act 1972.** A local authority can bring criminal or civil proceedings in its own name, including applying for injunctions, where it considers it expedient for the promotion or protection of the interests of the inhabitants of their area. Local authorities may use this provision to enforce their Children Act duties – as such wide-ranging injunctions could be obtained against known perpetrators.
- § **Injunction under the High Court's inherent Jurisdiction.** The recent case of Birmingham City Council v Riaz demonstrates that the High Court is willing to exercise its inherent jurisdiction to grant Injunction Orders against perpetrators of CSE. It is important to note that the High Court does not have jurisdiction to attach powers of arrest to any term of the injunctions, which makes the policing of these orders very difficult.