

Children's Services Overview and Scrutiny Committee

13th April 2022

Agenda Item No. 6

Children at Risk of Exploitation

Ward(s): All

Portfolios: Cllr Tim Wilson. Children's

Executive Summary:

The purpose of this report is to provide Members with an update in respect of Walsall's arrangements to support Children and Young People that may be at risk of exploitation. The issue of Child Exploitation remains a core and significant component of activity and leadership focus of Walsall Council, the Local Safeguarding Partnership and Community Safety Partnership.

Child Exploitation (CE) is a term with a broad definition. It includes Child Sexual Exploitation, Child Criminal Exploitation, County Lines, Modern Slavery and Trafficking. Local Authorities have overarching responsibility for safeguarding all children in their area. Their statutory functions under the 1989 and 2004 Children Act(s) include specific duties in relation to children in need and children suffering, or likely to suffer, significant harm (under sections 17 and 47 of the Children Act 1989).

Local agencies, including police and health services, also have a duty under section 11 of the Children Act 2004 to ensure they consider the need to safeguard and promote the welfare of children and young people when carrying out their functions.

Reason for scrutiny:

This is an annual updating report outlining previous and current partnership activity relating to tackling Child Exploitation here in Walsall.

Recommendations:

This report aims to provide assurances and updates of the work that has taken place across the partnership since last presented to this committee in March 2021. It invites this committee to note and endorse the current plans in regards to the work being undertaken here in Walsall to safeguarding children at risk of exploitation.

Background papers:

Child exploitation is a continued concern across the country and both government and local authorities have seen the impact that exploitation has had on its children. Through research there have been lessons learnt and so local authorities now have a better understanding of how all forms of exploitation links to other behaviours which put children at risk of exploitative harm.

Previous reports in regards to Child Exploitation have been presented to this committee on the following dates:

March 2021

January 2020

September 2019

September 2018

January 2017

November 2016

April 2015

October 2014

There have been a number of regional and national reports published since Alexis Jay's Independent Enquiry into Child Sexual Exploitation in Rotherham was published in August 2014. Since that time, the focus of what constitutes Child Exploitation has shifted and professionals working in this arena are now more educated as to its impact and how partners should work together in an attempt to reduce any risk within their communities.

Most recently, the National Child Safeguarding Practice Review Panel, funded by the DfE published its 2020 report into criminal exploitation. This report entitled '*It was hard to escape*' focused on the question of whether children and young people at risk of criminal exploitation receive state protection when they need it. This national review focussed on 21 young people from 17 Local Authorities where young people had died or suffered significant harm owing to them being criminally exploited.

In addition, Professor Alexis Jay has just last month (Feb 2022) published her latest report into child sexual exploitation by organised networks. Again, this review focussed on 6 case study areas and undertook a detailed analysis of information held by agencies to better understand the experiences and responses to children who were currently being, or had been, sexually exploited by organised networks.

Resource and legal considerations:

Responding to children at risk of significant harm is a statutory duty placed on local authority Chief Executives, Directors of Children's Services, Strategic Partnership Chairs and senior managers within organisations who commission and provide services for children and families. The resources required to respond to this statutory requirement come from within the existing resources across the partnership of organisations working in Walsall to protect vulnerable children and those at risk of harm.

Council Corporate Plan Priorities:

One of our corporate priorities is that children have the best possible start and are safe from harm, happy, healthy and learning well. We also aim to provide people to have increased independence, improved health, and can positively contribute to their communities. In Walsall, we strive to ensure that communities are prospering and resilient and that our children are living in safe and healthy places that build a strong sense of belonging and cohesion.

Citizen impact:

The effective delivery of high quality services to protect children and young people from significant harm, including the risk of child exploitation has a direct impact on the welfare and well-being of children and young people in Walsall. It directly links to the corporate priority to Improve Health and Wellbeing and the Children's Services objective that all children in Walsall are safe and supported.

Environmental impact:

Not applicable for this report

Performance management

Protection from abuse is a fundamental right for all children and exploitation is a form of child abuse. Our vision is to ensure that children, young people and their families whose lives are affected by exploitation will receive a high level of support, protection, and that offenders are held accountable for their actions, and brought to justice. We currently collate and track information in regards to exploitation by both the hub performance data, Mosaic and manual tracking from within the Exploitation team. We are currently in the process of ensuring our mosaic workflows are more effective in pulling out the data in regards to our young people at risk of exploitation.

Reducing inequalities:

Our Walsall All Age Exploitation Strategy sets out the vision that Walsall Council has to ensure the co-ordinated provision of services designed to address the protection of children and the disruption and prosecution of activities by adults. It provides specific support for those children and young people who are at risk of significant harm, including those with protected characteristics of gender, disability, race and religion.

In line with our corporate priorities, Walsall sets out the response to secure improvements in the equality of services, which when achieved, will have a positive impact on our most vulnerable children and young people. Local Authorities, Police and Health Services as key local partners must provide a robust safeguarding approach to ensure they have arrangements in place to provide adequate protection for children at risk of exploitation.

Consultation:

In order to make sure that all children and young people's voices are heard, we must make sure that appropriate and accessible participation opportunities are available. This includes ensuring that children and young people have the skills and support they need to take part in a way that works for them and their families. This will be outlined within Walsall's Participation Strategy.

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Introduction

The child exploitation landscape is a complex one with ever-shifting characteristics and challenges for local partnerships. The term 'extra familial harm' is one now embedded within current social work practice and local safeguarding partnerships are tasked with ensuring that those at risk within their communities are protected from those that wish to exploit them. Traditional approaches to protecting children/young people from harm have focussed on the risk of violence and abuse from inside the home, usually from a parent/carer or other trusted adult and don't always address the time that children/young people spend outside the home and the influence of peers on young people's development and safety. It is now recognised that children may be affected by 'modern day risks' and that exploitation does not recognise race, ability, disability, sexual orientation, gender or class and that all children can be at risk of exploitation.

Every year, thousands of children in the UK are exploited. Some have been groomed into county lines drug trafficking, others face sexual abuse from within their own community. Although the forms of exploitation are changing, the methods stay the same as an adult will target a child, trick them into trusting them, and then abuse their power for their own needs. This is known as 'grooming' and it is used for both criminal and sexual exploitation. The term 'Contextual Safeguarding' is now used to describe an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form within their communities, schools and online can feature violence and abuse. Contextual safeguarding recognises the impact of the public/social context on young people's lives, and consequently their safety. It seeks to identify and respond to harm and abuse posed to young people outside their home, either from adults or other young people. It's an approach that looks at how interventions can change the processes and environments to make them safer for all young people, as opposed to focussing on an individual.

There are some young people that are defined as being at greater risk of exploitation. For example, criminals are more likely to exploit children who live in poverty or face significant vulnerabilities such as being excluded from school or being a child in care. As such, it is important that professionals involved with these children recognise their needs and minimise any opportunity for them to be targeted.

Local Authorities approaches to tackling exploitation differs significantly but the one constant is that any approach needs to sit alongside the framework of tackling violence reduction. Exploitation is not an issue in itself but as a type of serious organised crime and as such any exploitation strategy needs to recognise the issues and what is being done in terms of tackling serious organised crime and violence reduction across the region.

Local Response – what we do here in Walsall

Exploitation Strategy

Since 2019, Walsall Safeguarding Partnership has moved to an All Age Exploitation approach and has now developed an overarching All Age Exploitation Strategy. The governance of this approach has been reviewed and is managed through the Exploitation Sub Group and operationally through the Exploitation Panel. Both of these are multi agency meetings with members from Childrens and Adults Social Care, Education, Licencing, Youth Offending, West Midlands Police, Health and voluntary organisations.

Regionally, as one of the seven metropolitan Local Authorities across the West Midlands, we continue to be represented at various forums that feeds into the Regional Strategic Exploitation Framework. The West Midlands Violence Reduction Unit continue to work jointly across the safeguarding partnerships to establish a comprehensive dataset/dashboard which will provide an overview of exploitation and abuse across the West Midlands. This is part of the overall public health approach across the region of which our revised strategy will feed into.

Operational response

In Walsall we operate a 'hub' which is a virtual multi-agency approach to identifying, screening, and sharing of intelligence around those at risk of exploitation. The hub performance data continues to be shared at Exploitation Operational Delivery Groups. This is where exploitation triage leads meet on a weekly basis to review any themes or issues emerging from the hub, which are then raised at our monthly Exploitation Panel and shared with all agencies. The hub seeks to clarify intelligence around current CSE/CE risk, victims, perpetrators and locations as well as learning from historical investigations. .

The development of the exploitation delivery groups has been key in bringing partners together and strengthening multi-agency relationships, to enable a clear and robust exploitation pathway to be developed and embedded across the partnership. The two delivery groups continue to be split between adults and children's so that issues relating to these particular cohorts can be focussed and agreed with relevant agencies.

Walsall's Exploitation Pathway and Assessment has been in place since September 2020. Through regular promotion by multi-agency updates, school briefings and webinars, we have been able to successfully embed the process, so that they are now regularly used by professionals making referrals for both vulnerable adults and children. The pathway works alongside our MASH and promotes effective sharing of information between agencies. These discussions include, virtual schools, street

teams, Youth Justice Service, NPU police, Locate police, adult social care and a member of our exploitation team.

Our Exploitation Team is led by our Principle Exploitation Reduction Officer, Katie Storer-Young. This is currently a non-case holding team that offers consultation and support in regards to all types of child exploitation including sexual, criminal and children at risk of being trafficked. This role is now well established, with a key focus on strengthening partnership responses to missing and exploited children, young people and vulnerable adults here in Walsall.

The team consist of the following staff:

- 1 x Principle Exploitation Reduction Officer (full time)
- 2 x Exploitation and Missing workers (full time)
- 2 x RHI Missing officers (full time)
- 1 x Specialist Practitioner (full time)

Team key activities:

- Is responsible for monitoring and reporting on all aspects of performance around exploitation and children who go missing across all Children's Services
- Holds daily exploitation triage in consultation with external agencies as part of all age exploitation strategy
- Has oversight of all missing children episodes and service responses
- Will offer 1:1 support sessions for practitioners and manager to complete exploitation assessments and use of toolkits and to consider/reflect upon potential support and disruption for individual children
- Will prompt allocated workers and Team Managers when missing children strategy meetings are required and attend these meetings
- Will attend planning or decision making meetings where there are indicators of any child being exploited, or going missing
- Works with all statutory and community partners to prompt and assist joined up working in respect of safeguarding and disruption in Walsall
- Has links to neighbouring authorities and regional forums where Local Authority/external agencies responses to vulnerable children are discussed
- Collaborates with west midlands VRU and have secured additional funding for 1 x additional exploitation worker within the team.
- Provides regular data and team overview to Senior Managers, where all of the above is presented and shared
- Is available for consultation, advice and support across all teams in Children's Services and Targeted Help in relation to exploitation.

Access to police support via the Exploitation Hub now consists of the following officers:

- 1 x Full time Sgt – Exploitation
- 1 x Full time PC – Exploitation
- 1 x Part Time PC – Exploitation
- 1 x CSE Sgt, 2 days a week
- 1 x CSE Coordinator, full time
- 1 x LOCATE Missing PC, full time

Triage 'hub' Data

The following is a breakdown of the numbers of children that have come through exploitation triage between 1st March 2021 and 28th February 2022.

Total number of children discussed is 334 and the breakdown of risk is as follows:

Level of risk	CE (Criminal Exploitation)	CSE (Child Sexual Exploitation)	CE and CSE	Youth Violence	Missing	Other
No risk	19	7	2	0	0	8
Low	142	56	9	3	1	0
Med	38	18	13	1	1	0
High	8	7	0	0	1	0
Total	207	88	24	4	3	8

In regards to referrers, the following breakdown applied:

CSC	Education	Street Teams	Police	YJS	Health	Early Help	Other
196	67	2	16	16	5	21	11

The team are currently working directly with a total of 13 children that are all medium and high risk. In addition, the team offers support to locality safeguarding teams in regards to issues of exploitation which is incorporated into the care planning for each of those children. The team are also working to try and map, track, build relationships and develop a direct youth work offer within key areas that have higher rates of youth violence and criminal activity. This is supported by mentors funded via the VRU, St Giles, Youth Connect and other organisations working with children across the area.

Utilising the support we have from the virtual school, we continue to link in with secondary schools in these areas, with a plan of offering prevention work in primary schools from March as a preventative approach to tackling the risk of exploitation in these key areas. This offers the schools the opportunity each week to discuss connections, actively engage children and work with mentors to support those children on the periphery of gang involvement and youth violence.

As we are now 18 months in, our Principle Exploitation Reduction Officer, is leading on a review of the paperwork and its effectiveness as part of the delivery Group. This review will consider overall effectiveness, consistency of information provided and collation of where referrals come from in regards to which agencies refer and those that do not. This will allow us to have a greater understanding of where to target further learning and development and if the forms used continue to be fit for purpose.

All missing children notifications from police and all exploitation assessments for children, young people and adults, continue to be discussed at the daily triage within 24 hours of receipt. This ensures a coordinated and timely response to information received and allows for appropriate intervention and support to be identified and implemented at the earliest opportunity. This work supports the primary and secondary interventions outlined within the Exploitation Strategy.

Over the course of the pandemic, the number of children going missing has fluctuated with significant periods during lockdown when the numbers have stayed low. Since restrictions have lifted, the number of missing logs have again reverted to pre pandemic numbers. In December 2021, the team received 99 missing logs (this was an increase of 12 from Nov 2021). Out of that 99, 10 were for children who live in our area but are from a different local authority so those notifications are forwarded onto the responsible authority. Of the 89 left, these were in respect of a total of 42 children.

The team continues to have direct contact with children who have been missing and all children are offered and/or are visited after a missing episode, usually within 72 hours of the episode. The missing worker completes return home conversations with the children and young people looking at the reasons why they were missing, provides a chance for them to talk about what happened whilst they were away and how they may be feeling now that they have returned. Whilst all children are offered this opportunity immediately once they return, not all may wish to receive it but the option to do so at a later date is available should they choose to do so.

As Covid-19 restrictions have lifted, there is now a greater push to get more disruption work being undertaken on the ground. This will include group work activities, community based support and how we best support these young people and their families. This has been further supported by some agreed funding through the VRU which has allowed us to utilise 1 x full time post from within our Turning Point Service to be dedicated to work community exploitation work across the borough.

We continue to work in partnership with the St Giles Trust and currently our Exploitation Team has a mentor from St Giles working with us for two days a week. This mentor works directly with children and young people from the Caldmore and Palfrey areas as we know this area has a high population of gang related referrals into exploitation triage. These children are also supported by YJS and street teams as part of the overall partnership response and is part of the wider work of Operation Bowbrush tackling exploitation and youth violence across the region.

In October 2021, Walsall Childrens Services was subject to a full ILACS inspection of which our response to exploitation was a key line of enquiry. In their final report that was published on the 26th November, they highlighted the following points:

'The response to children at risk of exploitation and children reported missing from home and care has improved significantly since the previous inspection in 2017 and a focused visit in December 2019. Professionals have a shared understanding of thresholds for exploited and missing children, enhanced by the daily multi-agency triage meeting in the MASH. This includes a range of specialist workers from the police, youth offending team, education, street teams, Turning Point, specialist sexual and criminal exploitation workers and the early help service. Professionals work closely together and collaborate well'.

Governance

Walsall now has an All Age Exploitation Reduction Strategy which is governed by the Safeguarding partnership. The Exploitation Sub Group continues to be held bi monthly and continues to be jointly chaired by Police and Local Authority. Information is also provided in regards to the partnership work around exploitation through Operations and Scrutiny Group and Performance and Quality Assurance meetings.

Exploitation Panel continues to be held monthly to ensure that there is a partnership understanding of risk, threat and harm and to provide a multi-agency coordinated response to safeguard and protect vulnerable children and young people. Themes from exploitation triage, exploitation work and any relevant areas of concerns form the basis of the agreed agenda items and a greater focus on partnership updates has been included within recent panels. It is also a forum whereby national publications are shared and discussed providing partners with the opportunity to reflect on how any recommendations that may arise from these, can be considered within their respective agencies.

Key focus points of the panel include:

- Raise awareness of exploitation across the partnership
- Discuss the need for expert consultation and analysis
- Help identify contextual risks and “map” known intelligence
- Gather and share intelligence from within and out of the area
- Collate data to create a local understanding of need
- Increase understanding of geographical “hotspots” and local themes

- Keep up to date with current practice research and themes.

The Exploitation Risk Register is in place and has now been updated to focus on issues such as capacity and resources within the hub. As a partnership, this is a strategically owned risk register around All Age Exploitation and so is owned by panel and is a permanent agenda item so that professionals can consider the impact of this within their respective roles. This then assists with identifying areas for development and learning locally, regionally and nationally across the partnership.

Investment from across the partnership is critical to fully tackle all facets of exploitation and here in Walsall we are having some real success in our responses to those at risk. As a partnership we work well to identify risk and intervene as appropriate and our systems rely heavily on the investment from partner agencies with clear assessment frameworks, referral pathways and sharing of resources in order to offer both support and intervention alongside the need to pursue prosecutions.

Partnership Updates

Police

Operation Yinto

In July 2021 there was a number of concerns around the sexual exploitation of young people in and around William House Walsall. This was a disused building that had become a 'hotspot' of activity in relation to potential exploitation of young people and vulnerable adults from Walsall and across the west midlands. Following further enquiries and multi-agency mapping activities, we were able to identify those at risk and implement safeguarding plans to protect them. As part of this operation, we were also able to obtain a closure order on the building and secure the area as a way of disrupting the activity that had been taking place.

We are now in the second phase of Operation Yinto which is focused on enforcement and disruption of perpetrators of Child Sexual Exploitation. Multi agency visits are taking place across the borough by visiting hotels, fast food restaurants, pubs, schools and children's homes to provide staff with awareness and gather intelligence. In addition, we continue to maximise opportunities to prosecute potential perpetrators for any offences and bring them to justice by working much more closely together to tackle CSE across the region. Regular partner updates are provided at exploitation panel and areas of concern and/or emerging themes are discussed and actions agreed.

The joint working within the hub continues to work effectively and allows for the opportunity for us to expose risk and respond to it early. A recent example was when a referral was received from a DSL that had raised concerns in regards to one of her pupils that appeared to have been receiving gifts from an adult male. This led to direct

work being undertaken with the young person and after some time and building of trust, he was able to confide in professionals about what was happening to him which ultimately led to an arrest of this individual. In addition, since the arrest has been made, other potential victims have come forward strengthening the case against this adult that has for some time been exploiting vulnerable young people. This, amongst others, is a prime example of what the hub is designed to do and how it aims to keep our children in Walsall safe from those that wish to exploit them.

Violence Reduction Unit

The West Midlands Violence Reduction Unit continues to work across the region and have a number of projects in place across the west midlands. One project is the 'step together' which provides youth workers on key locations to and from schools so that young people fearing exploitation and violence have a trusted adult as a point of contact to support them. This project is targeted at key schools whereby young people are at greater risk of becoming exploited and coincides with the support and education programmes that the VRU continue to offer schools across Walsall.

Walsall Childrens Social Care have recently received some funding from West Midlands VRU to enable us to increase the hours of our violence coordinator. This ensures that there is a focus directly on youth violence and it is in tune with our exploitation work as there are many overlaps between youth violence and exploitation within our communities. This work has been really useful in mapping local urban street gangs and understanding what the local picture looks like in terms of how our children and young people are connected here in Walsall and across the region. Our violence co coordinator also currently works with four high risk schools within Walsall and connects children who are victims of violence directly to services. In addition, for those young people that have perpetrated violence against others, we are able to identify mentors to work with them in an attempt to reduce the levels of violence and support those at risk of further criminal exploitation. This level of work is closely aligned with our Youth Justice Services as many of these young people may be known to both YOS and Childrens Social Care.

Health – CCG

Black Country and West Birmingham acknowledge and support the Walsall Safeguarding partnership priority in responding to the risks of exploitation of children, young people and vulnerable adults. The designated nurse for safeguarding adults and the designated nurse for children in care are both active members of the exploitation partnership forums.

Black Country and West Birmingham CCG- Walsall Place continue to chair the All-Age Health Exploitation Group. The meeting has developed over the last 12 months with a range of attendees from across the health economy. The purpose of the Health Exploitation Group is to provide a structure in facilitating and embedding learning within the member health organisations to support systems in preventing abuse of children and adults at risk of exploitation. The group employ joint working to consider the impacts on all critical areas of business in protecting and recognising children and adults from exploitation and organised criminality. These arrangements seek to ensure each health partner/organisation will safeguard their stakeholders and promote the welfare of children and young people, vulnerable adults and protect the public in Walsall.

The Black Country and West Birmingham CCG are represented on the NHSE/ Regional Tackling Serious Violence Forum. In addition, the Designated Nurse for Safeguarding Adults is an active member of the West Midlands Anti-Slavery Network. Information from these strategic meetings is then fed in at a local level.

The CCG continues to assist with the co-ordination of the health response at a strategic level, ensuring there is correct representation at appropriate meetings from CCG and Provider Organisations with the intention of a health response in the Exploitation Hub and understanding the link between both the Safeguarding Partnership and Community Safety Partnership.

The CCG presented the Tackling Child Exploitation (TCE) Community Resilience Project that Walsall had been fortunate to undertake to regional Safeguarding Leads at an NHSE Meeting. In addition, the CCG is currently facilitating work with the Violence Reduction Unit, to gain accurate health data to inform regional dashboards with the view to possibly commissioning a local response to support Walsall Accident and Emergency Dept.

As a commissioning organisation the CCG monitors their providers Safeguarding Training (including Exploitation) compliance via system wide Safeguarding Dashboards. This gives assurance that all staff have the appropriate level of training to respond to Safeguarding Risks. The Safeguarding Team ensure all communications relating to Exploitation is disseminated accordingly across the health economy in Walsall.

Street Teams

Street Teams continue to be a key partner in our work with young people at risk of exploitation. They run a multi-faceted prevention programme involving outreach work directly with young people as well as offering education and training programmes with schools and health agencies.

They continue to offer support to a number of our young people here in Walsall and aim to help them understand the risks, raise their self-esteem as part of their heal and repair journey and allow them to build aspirations for their future. Street Teams continue to be an active member at Walsall Exploitation Panel and continue to work alongside Walsall Childrens Services Exploitation Team.

Regional work

We continue to be involved in national initiatives and this month (March) are heavily involved in County Lines Awareness, National Exploitation Day and Operation Aidant. Operation Aidant is coordinated by the National Crime Agency (NCA) and is run nationally every year based on a key theme and involves local police forces working alongside partner agencies to focus on modern slavery and human trafficking (MSHT). The campaign works to highlight the signs of modern slavery which people may encounter in their everyday lives, and encourage them to confidently report it. This is a key area for development and continues to be supported across the region by the 7 west midlands Local Authorities.

Next steps

Exploitation Pilot

In terms of operational strategies, we have linked in with the National Working Group and sought advice from other Local Authority's around their exploitation journey and how we can learn from and avoid mistakes of others. As we know, the national picture on how Local Authorities and partner agencies tackle exploitation differs significantly and we need to identify what is best for us here in Walsall. Understanding what we have, what our pinch points are and how we can best utilise our resources is crucial and we are now getting a much clearer picture overall. As such, we are now building on our work by developing a 12 month exploitation pilot team.

This pilot programme will focus on delivering bespoke packages of support to individual children that will be identified and selected through exploitation triage. This team will have case hold responsibility for up to 20 young people at risk of either criminal or sexual exploitation. The work of the team will be trauma informed and will focus on the use of motivational interviewing as a way of disrupting the pattern of exploitation. Caseloads within the team will remain small (approximately 5 each) so that the team have the dedicated time available to ensure that the required level of direct work is undertaken.

The pilot team will be set up to act as a 'pod' as an addition to the current Exploitation Team managed by Kirsty Storer-Young. The 'pod' will consist of a Consultant Social Worker, 1 x Social Worker and an ASYE Social Worker. The management of the Consultant Social Worker will, in the interim, sit under the Group Manager, Rebecca Warren. These posts have now been advertised internally as secondment

opportunities across the current social work teams and two of the 3 roles have now been filled.

The work with these young people would be undertaken in line with the Family Safeguarding Model using motivational interviewing in order to develop an assessment of need leading to a programme of tailored support. Group case supervision with input from all professionals would then be used to build on strengths and identify positive changes. In addition to the social workers, the team will consist of detached youth workers in partnership with Early Help and Street Teams. We will have dedicated support by being able to utilise resources from Youth Services and input from a dedicated CASH (contraception and sexual health) nurse.

Following a dedicated training programme being completed with the team, we are aiming to go live in May 2022. An evaluation framework has been devised in consultation with Wolverhampton University so that the impact of the team can be captured in order to inform us of whether this should become a permanent structure in our future service delivery.

Zoe Morgan
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