

**CONSULTATION SUMMARY REPORT ON DRAFT  
GUIDANCE ON UNDER-AGE SEXUAL ACTIVITY:  
*MEETING THE NEEDS OF CHILDREN AND  
YOUNG PEOPLE AND IDENTIFYING CHILD  
PROTECTION CONCERNS***

**CONSULTATION SUMMARY REPORT ON DRAFT GUIDANCE ON UNDER-AGE  
SEXUAL ACTIVITY: *MEETING THE NEEDS OF CHILDREN AND YOUNG  
PEOPLE AND IDENTIFYING CHILD PROTECTION CONCERNS***

**SCOTTISH GOVERNMENT RESPONSE TO CONSULTATION**

**December 2010**

**Introduction**

1. The Scottish Government held a consultation on the draft national guidance, *Under-age Sexual Activity: Meeting the Needs of Children and Young People and Identifying Child Protection Concerns*, between 26 April and 23 July. The following consultation report sets out the background to the consultation, a review of the key issues arising from the responses and the Scottish Government's own response, particularly setting out changes to be made to the guidance as a result. The final version of the guidance is expected to be published before the end of 2010.

2. The guidance has been developed to help practitioners and local services and agencies in considering what protocols and policies need to be in place to effectively meet the needs of children and young people who are engaged in under-age sexual activity. It was written from the perspective of how issues arising from under-age sexual activity should fit with child protection procedures at local level, while also recognising that not all under-age sexual activity above the age of 13 is a child protection matter.

3. The need to revise the guidance was prompted by changes to the current legislative and policy context regarding sexual offences, and children and young people. In particular, there was a clear need for guidance to support practitioners in understanding what the new Sexual Offences (Scotland) Act 2009, due to commence on 1 December 2010, will mean for how they deal with incidents of under-age sexual activity. The Act maintains the age of consent as 16.

4. The guidance also recognises that research has shown that over a quarter of young people engage in sexual activity under the age of 16, often as part of typical sexual development. It would not be appropriate to treat all under-age sexual activity as a child protection issue, although there may be other types of support required by the young person. This guidance needs to strike a balance between assuring the freedom of young people to make decisions about their own lives, within the framework of rights established by the UN Convention on the Rights of the Child, while protecting them from activity which could lead to significant harm. For practitioners, what is critical is being able to recognise the risks to children and young people and knowing and acting on effective local procedures to help assess the risks, share information and escalate if required.

5. The guidance must be read within the context of the wider review of Scotland's National Child Protection Guidance – indeed, this was an explicit question in the consultation. The National Guidance was also issued for consultation over the

summer – that consultation ended in September 2010 and the responses are currently being reviewed with the intention of the revised national Guidance being published before the end of this year. The National Guidance addresses wider issues such as risk assessment, roles and responsibilities, information-sharing, responding to child protection concerns and definitions of a child in much more detail, and as such, this guidance has been deliberately drafted to have a light touch on these issues.

6. This consultation report is structured as follows: a brief description of the background to the consultation and the guidance; a summary of the key issues highlighted by respondents to the consultation; and the actions that the Scottish Government will take in response. This is not intended to be a comprehensive report of all the issues raised in the consultation, but those noted by several respondents and those which raise important questions about parts of the guidance.

7. The publication of the consultation report will be accompanied by the publication of the final version of the guidance, which will be available on the Scottish Government website and disseminated to Child Protection Committees and key bodies as soon as possible.

## **Background**

8. *Under-Age Sexual Activity: Meeting the Needs of Children and Young People and Identifying Child Protection Concerns* was originally drafted by a stakeholder working group in September 2008. This group included representation from Child Protection Committees, police, health professions, the Crown Office and Procurator Fiscal Service as well as the third sector and was led by a member of the Scottish Government's Child Protection Policy team.

9. Further development of the draft guidance was delayed because of passage of the Sexual Offences (Scotland) Bill, whose outcome would have a significant effect on guidance in this area. The draft guidance was shared with the Scottish Parliament Justice Committee as part of their Stage 1 considerations on the Bill, and then set aside until the Bill was resolved.

10. The Sexual Offences (Scotland) Bill was passed by Parliament on 10 June 2009, becoming the Sexual Offences (Scotland) Act 2009. It is due to come into force on 1 December 2010. The legislation introduced provision to:

- provide for the first time a statutory definition of consent, as 'free agreement', enshrined in the law;
- replace the common-law offence of rape with a broader statutory offence (which includes male rape);
- define new statutory crimes, including specific offences of sexual assault by penetration and of voyeurism, and others targeting coercive sexual conduct such as the sending of sexually-offensive emails or texts, and sexual exposure;
- enable Scottish law enforcement agencies to pursue anyone from Scotland who commits a sex crime under Scots law against someone under-18 abroad

(including child pornography and child prostitution offences) regardless of the law in that country; and

- include 'protective offences' to safeguard those with limited or no capacity to consent due to their young age or a mental disorder – this includes equalising at 16 the age of consent for boys and girls.

11. The draft guidance on under-age sexual activity was updated to reflect the Act, with input from the working group. The draft guidance was shared with Child Protection Committees and subsequently revised to take account of comments.

12. A full public consultation was undertaken on the guidance between 26 April and 23 July 2010, through the Scottish Government's website, with provision for both written and online responses. The consultation was designed to be generic enough to be useful for all types of organisations – police, health, social work, education, third sector.

13. The consultation document set out a series of specific questions, and also invited general comments on the guidance. These were:

- *Do you agree with how this document describes the relationship between under-age sexual activity and child protection?*
- *Is the guidance clear in relation to the scale of response required depending on whether a child or young person is at risk of significant harm, or has other support needs that do not constitute a child protection risk?*
- *How would this guidance add value to your local policies and procedures? How could it be improved to add more value?*
- *The document deliberately offers limited information about issues discussed in further detail in the National Child Protection Guidance. Do you agree with this approach, or would you prefer to see less/more detail about other issues (and if so, which)?*
- *Is the terminology and descriptions used throughout the document relevant to your specific agency or service?*
- *Are the processes described in this document relevant for your particular agency or service? What elements of the guidance are not compatible with your current practices?*
- *Is this guidance targeted at the right people?*

### **Responses: Common Themes**

14. In total, 62 responses were received through the consultation from a range of agencies and individuals, but with a strong representation among those who worked in services for children. Those which have signalled their willingness have had their responses published on the Scottish Government website.

15. Although a number of more minor issues were raised, the following common themes emerged from the consultation.

16. Overall, the need for the guidance was recognised and its current draft was widely approved. That being said, one set of issues was highlighted above all, which, if not addressed, could affect whether the guidance would be fit for purpose. This related to issues around confidentiality and referral to the police – in particular, paragraph 18 was the most contentious part of the draft guidance, as it stated that information should be shared with all relevant agencies and that the police must be informed if a crime has been committed. The first part raised concerns regarding the confidentiality rights of a child while the latter part caused controversy, as it would appear that all incidents of under-age sexual activity would consequently need to be reported to the police.

17. Respondents gave a multitude of different arguments as to why changes had to be made to paragraph 18 and these are discussed in more detail under Question 2 below. Arguments included, that it would result in a child's confidentiality rights being breached, that it makes the document contradictory, that it goes against the ethos of some sexual health services and lastly, it would deter young people from using these services, which could lead to increases in STIs, under-age pregnancies etc.

18. A few respondents suggested that these concerns would be diluted if there was greater clarity over the police's role in terms of their response and degree of powers in reporting discretion and it was suggested that all children should be consulted before making a referral or sharing information with other agencies. However, the consensus was that referral to the police should only be limited to the circumstances where child protection is a factor and that information should only be shared on a need-to-know basis, after consulting with the child involved.

### **Responses: Question-specific Issues**

#### **Question 1: Do you agree with how this document describes the relationship between under-age sexual activity and child protection?**

##### **Comments**

19. Of the 57 respondents to this question approximately:

- **53%** – considered the draft document to describe the relationship adequately
- **40%** – felt that the document only described that relationship in part
- **3%** – did not feel the document described the relationship adequately
- **13%** – drew attention to the issue of reporting instances of under-age sexual activity to the police as set out in paragraph 18

20. A key goal of the document was to present clearly and concisely the potential links between under-age sexual activity and child protection in a way that would provide effective advice to professionals when faced with the issue. There was a clear majority of respondents who regarded the document as setting out, at least in part, an adequate description of the circumstances in which under-age sexual activity can lead to child protection concerns and the factors that professionals should take account of when considering how to support children and young people.

As one respondent noted, typically of the positive responses: “We consider this to be a balanced document, which aims to acknowledge that under-age sex occurs, but also indicates a proportionate response.”

21. Of those that qualified their view on how well the document set out the issues, there were a number of comments made on different issues, most of which recur in the responses to later questions. The recurring comments were the following.

22. As noted above, nearly one in eight of the respondents to this question highlighted the issue of how the criminality of any under-age sexual activity should be addressed by professionals, particularly requirements to report to the police. Comments focused on the stipulations in paragraph 18, and surfaced in several of the consultation questions. As a result, a more detailed discussion of the issue – and the Scottish Government’s response – is set out under Question 2 below.

23. A few respondents felt that there was a need for clearer definition of what constituted ‘child protection’ and what was meant by a ‘child’ in the guidance. The terms can have different definitions in different contexts, so it was essential the guidance set out at the start the key concepts for practitioners and ensured that they fully reflected the use of those terms in the revised National Child Protection Guidance.

24. A few respondents felt that the exclusive focus on child protection in the context of under-age sexual activity meant that the wider, well-being of young people was not fully reflected in the issues for professionals to consider and the responses they should take. One respondent noted: “[the document] is weak on the support needs and health and well-being implications of under-age sexual activity, which could lead to these issues being forgotten by other agencies to the detriment of the welfare of young people.”

### Scottish Government Response

25. On the definition of key concepts, the relevant text has been strengthened in the guidance, in particular: a longer, clearer description of how ‘child’ and ‘young person’ are employed as concepts in the guidance, based on the more comprehensive descriptions in the National Child Protection Guidance; and a more consistent use of terms such as ‘harm’ and ‘significant harm’ as the defining concepts for information-sharing and child protection action respectively.

26. On the suggestion that the guidance fails to take into account wider needs, the guidance is clear that it must remain focused on under-age sexual activity in the context of child protection. It should not duplicate the existing guidance – especially at local level – that is available on the other services to support these young persons. However, the text in the guidance has been revised to highlight the importance of practitioners addressing wider, well-being issues and being aware of relevant services and guidance/protocols available locally which could support young persons.

**Question 2: Is the guidance clear in relation to the scale of response required depending on whether a child or young person is at risk of significant harm, or has other support needs that do not constitute a child protection risk?**

Comments

27. Of the 53 respondents to this question approximately:

- **36%** – agreed that the guidance was clear on the scale and nature of the response required
- **30%** – felt that the guidance was not sufficiently clear on this issue
- **34%** – regarded the guidance as only being partially clear on how to respond to the child protection or other needs of children and young people
- **55%** – drew attention to the issue of reporting instances of under-age sexual activity to the police, particularly as set out in paragraph 18

28. As has already been noted, and as the above figure of responses to this question makes clear, the issue of automatic referral to the police raised more concerns among respondents than any other single issue. Concerns focused on paragraph 18 in particular, which, in the consultation draft, stated:

“Information –sharing with all relevant agencies is essential to ensure the best possible decisions are made. The police must be informed if there is suspicion that a crime or offence has been committed or that a child or adult is at risk.”

29. Criticisms of the implications of the paragraph – especially the issues surrounding police needing to be informed of a ‘suspicion that a crime or offence has been committed’ (which would effectively mean all young persons involved in under-age sexual activity) – raised three different sets of questions (the points are drawn from all the comments made on the issue, not just those arising under this question).

- Is this requirement effective? Many respondents – particularly those involved in the provision of sexual health advice – noted that this requirement would put strains on advisory services to support young persons. By compromising their confidentiality, it could deter young persons from accessing these services and compromise the ability of practitioners to discover those cases of under-age sexual activity where child protection concerns are present. Although it was not stated that referral would automatically result in prosecution of young persons, several respondents felt that the act of referral itself could undermine the efficacy of the wider range of services to support children and young people and the relationships of trust on which many of them are founded.

- Is this requirement proportionate? Several respondents noted that the reporting of a crime to the police is a serious matter. One respondent commented: “[The police] have no discretion regarding under-age sexual activity, which must be investigated. This is, therefore, inconsistent with a proportionate response.” Subject to further specific guidance to the police on how reported under-age sexual activity cases should be investigated, it is not clear to what extent the police could exercise discretion in this area. That uncertainty gave rise to the criticism that this requirement was not proportionate in its treatment of different cases of under-age sexual activity.
- Is this requirement consistent? The most frequent set of questions raised by respondents under this issue was the apparent inconsistency of approach suggested by paragraph 18 and other parts of the guidance. One respondent gave an example of this inconsistency: “[Paragraph] 18 states that the police must be informed if there is a suspicion that a crime or offence has been committed and then [paragraph] 60 states that the overriding principle should be that the confidentiality rights of children and young people should be respected unless there is a child protection concern. It appears that different sections of this document are providing conflicting guidance.” Inconsistency was highlighted in several parts of the document, but in general, the emphasis on a proportionate approach, which highlighted the specific instances of under-age sexual activity requiring a child protection approach, clashed with the directive under paragraph 18 suggesting a more blanket, automatic approach. Overall, this approach ran the risk of making the guidance incoherent on a crucial issue.

30. The issues raised by paragraph 18 were not the only ones raised in responses to the question. Some respondents highlighted difficulties in the sharing of information about a young person arising from the confidential nature of the services they were using, not least with respect to the risks it also put on the relationships of trust on which these services often depended.

31. Another recurring issue was the need for the guidance to provide more active signposting to support services for young persons, particularly where child protection concerns may not be present but other needs have been identified.

### Scottish Government Response

32. With respect to the issue of automatic referral to the police, the Scottish Government has removed the suggestion that all instances of known under-age sexual activity must be reported to the police. The new text in paragraph 18 will now read as follows:

“Information-sharing with all relevant agencies is essential to ensure the best possible decisions and the police are often an important part of this process. When the police are made aware of cases of under-age sexual activity – either directly or through information from another agency – they will consider how to proceed based on the best interests of the child and young person and the nature of the sexual activity, for example, the age of the individual or whether there is information that coercion has taken place. It is down to local discretion whether police decide to pursue an investigation or alternatively to



pass information on to the most appropriate partner to progress. Even where an investigation may take place, the police are not obliged to refer every case for prosecution. The information below provides more detail about this process.”

33. With respect to the sharing of information about a child and young person, the text in the guidance has been revised to make clear the child protection circumstances in which this should take place. The importance of sharing information in a child protection context is set out in more detail in the National Child Protection Guidance.

34. With regards to signposting to support services, while it would not be possible for the guidance to highlight all the local services that are available, it does make clear the importance of ensuring that the needs of children and young people should be actively met even when child protection concerns are not present as well as the importance of local protocols being in place and used by practitioners.

**Question 3: How would this guidance add value to your local policies and procedures? How could it be improved to add more value?**

Comments

35. Of the 54 respondents to this question approximately:

- **50%** – had suggestions about how the guidance could be improved
- **28%** – were happy with the guidance and said it would add value to local policies and procedures

36. As noted above, respondents had strong concerns about the detrimental effect infringing the confidentiality of a child and young person could have and had strong reservations over the reporting all under-age sexual activity to the police (particularly with relation to paragraph 18). They believed that these areas would add no value to local policies or procedure and would instead have a negative impact. The issues around this have been discussed in detail under Question 2 above.

37. Many respondents felt that in order for the guidance to add proper value to local policies, training would have to be undertaken, particularly around training staff to deal with issues sensitively and educating them about confidentiality protocols. Therefore, it was suggested that a clear training plan linked to the document would make a helpful tool box for practitioners. Similarly, there were suggestions that Annex B could be developed into a more comprehensive risk assessment tool, by including various additional indicators, such as knowledge of sexual activity inappropriate to age and sexualised behaviour.

38. Furthermore, several respondents felt that in order to add value to local policies more information and clarity was needed on some specific issues within the guidance. In particular, respondents wanted explicit guidance around thresholds, additional information regarding the outcomes of under-age sex and greater clarity around risk assessments and the roles and responsibilities of practitioners. It was

suggested that more flow charts and examples could help clear up some of the ambiguity within the guidance.

39. Positively, several respondents believed that the guidance would help create a national baseline and would further develop and add to local policies and procedures.

#### Scottish Government Response

40. On the issue of training, wider issues of training in child protection are addressed in the National Child Protection Guidance. That guidance makes clear that training remains a local responsibility, but one that is multi-agency in nature and shared under the responsibility of Child Protection Committees.

41. On the further development of Annex B, while it is not the intention of the annex to act as a comprehensive risk assessment tool – it is clearly designated as an aid to practitioners and only highlights an indicative rather than an exhaustive list of issues and questions – nevertheless, the Annex has benefited from a number of useful suggestions of factors that should be included.

42. On the requests for more information and clarity around certain issues, the Scottish Government's view is that clarity around roles, responsibilities and processes need to be addressed in local guidance, including the use of any graphics to illustrate how these procedures work in a particular locality. With regards to wider child protection issues, the National Child Protection Guidance does provide clarity around many of these issues and should be used as the primary source of national information.

**Question 4: The document deliberately offers limited information about issues discussed in further detail in the National Child Protection guidance. Do you agree with this approach, or would you prefer to see less/more detail about other issues (and if so, which)?**

#### Comments

43. Of the 54 respondents to this question approximately:

- **42%** – either said they did not know if they agreed due to the lack of information or commented elsewhere on this
- **30%** – wanted more detail included
- **26%** – agreed that offering limited information about issues contained in the national child protection guidance was the right approach
- **2%** – wanted less information

44. The majority of respondents, felt they were unable to properly answer this question as, at the time of answering, the draft National Child Protection Guidance was unavailable.

45. For those who answered later and were, therefore, able to read a draft copy of the National Guidance (as the latter was out to consultation), a few issues were highlighted. The most problematic being that the documents did not mirror each other, especially as no contentious directive similar to paragraph 18 appeared in the draft National Guidance.

46. For those respondents, who asked for more detail, the requests were diverse and ranged from clarification on whether voluntary and independent agencies had to involve local authorities, to a request to reference the national policy approach around sexual health and HIV.

### Scottish Government Response

47. The consultation on the National Child Protection Guidance overlapped with the consultation on this guidance by only a few weeks, so it was not possible for some respondents to address the question sufficiently. To ensure that there is a proper fit between this guidance and the National Guidance, the Scottish Government is taking the following steps. The guidance on under-age sexual activity will be published before the National Guidance is finalised, but will take account of the responses to the consultation on the latter set of guidance. This will ensure that the National Guidance can be revised to take full account of the revised text to this guidance as well as the issues raised in the consultation.

### **Question 5: Is the terminology and descriptions used throughout the document relevant to your specific agency or service?**

#### Comments

48. Of the 54 respondents to this question approximately:

- **59%** – agreed that the terminology used was relevant
- **19%** – partially agreed that terminology was relevant
- **2%** – found terminology and descriptions ‘ambiguous, vague and open to challenge’

49. Positively, the majority of respondents were happy with the descriptions and terminology used throughout the guidance. Despite this broad consensus, a few respondents did ask for greater clarification around some of the terminology used: for example, ‘single agency’, ‘single worker’, ‘mutually-agreed sexual activity’ and ‘sexual activity’ that is ‘abusive or exploitative’.

50. Additionally, a few respondents highlighted that the language and style used within the guidance could be more consistent and should be modified to appeal to younger readers.

51. Concerns were also raised around the issue of homosexuality and how this was represented within the guidance. The guidance, was criticised for its lack of information regarding the problems specifically faced by LGBT children and for the lack of statistics referring to homosexual under-age sexual activity, especially since heterosexual statistics were included in paragraph 14.

52. Similarly, some respondents wanted more general evidential facts regarding the dangers and outcomes of under-age sexual activity to be included in paragraph 13.

### Scottish Government Response

53. With respect to clarification of terminology, the Scottish Government has revised some of the text to ensure greater consistency in the use of key terms. However, it was clear from the nature of the responses that many terms were highly contested. As with many child protection issues, a reliance on the judgement of practitioners is both inevitable and appropriate, when backed up by the proper local protocols and oversight arrangements. The guidance makes clear the importance of practitioner judgement and the need for clear consensus around local procedures.

54. With respect to language and style, the original draft of the guidance was written to be as clear and simple in its wording as possible. While some changes have been made to ensure consistency, the language has not been further modified to appeal to younger readers as the guidance is primarily aimed at practitioners and such changes would not be appropriate given this focus.

55. On the issue of how the guidance addresses homosexuality, the guidance is designed to focus on under-age sexual activity as a whole. Issues of sexual orientation should be considered as appropriate within the wider context of the individual circumstances of each young person that a practitioner addresses, and the guidance makes clear that the full range of factors – and how they combine together – should be considered when considering child protection issues.

56. With regards to the issue of evidence, paragraph 13 (as numbered in the consultation draft) has been altered to remove the citation of figures specific to particular groups of children and young people. The paragraph is meant to be context-setting so a fuller description of the research on these issues has not been included as it would not be appropriate given the practical focus of the guidance.

**Question 6: Are the processes described in this document relevant for your particular agency or service? What elements of the guidance are not compatible with your current practices?**

### Comments

57. Of the 54 respondents to this question approximately:

- **43%** – asked for further clarification in certain areas or felt that there were elements of guidance they were not compatible with current practice
- **33%** – agreed that the processes described were relevant for their particular agency or service

58. Respondents again highlighted how referring all cases of under-age sexual activity to the police would not be compatible with their current or indeed, good practice, how this would shame and stigmatise young people and how this could

lead to genuine child protection cases being missed because of the increased workload caused by reporting and investigating all under-age sexual activity. Within these responses there were arguments put forward on the health and welfare implications for young people if they could not access confidential sexual health services. The issues around this have been discussed in detail under Question 2 above.

59. Additionally, there were strong reservations about recording all information including decisions made on whether to refer to police, as this is not standard practice for most sexual health services and would be very laborious especially for those cases where there are no child protection concerns.

#### Scottish Government Response

60. With regards to the issue of recording, the guidance has been developed within the context of good practice principles set out in the *Getting it right for every child* approach. Effective planning and information sharing around children, particularly in a child protection context, requires effective recording of information – however, such recording must take full account of the information rights of the young person. The guidance sets out the issues involved in the treatment of information about children and young people when child protection concerns have been raised and refers practitioners to the more detailed discussion of the issues in the National Child Protection Guidance.

#### **Question 7: Is this guidance targeted at the right people?**

##### Comments

61. Of the 54 respondents to this question approximately:

- **61%** – agreed that the guidance was targeted at the right people
- **17%** – were unsure whether the guidance was targeted at the right people

62. The majority of respondents agreed that the guidance was targeted at the right people. Several respondents did suggest that the guidance would be improved if it specifically mentioned doctors, voluntary sector, young people and the public at particular points in the guidance.

63. Similarly, to earlier comments it was once again suggested that the document could be written in a more youth-friendly way.

#### Scottish Government Response

64. Where specific suggestions have been made to include specific mention of particular groups, these have largely been made throughout the guidance.

65. The issue of the youth-friendly tone of the document has been addressed under Question 5.

## **Question 8: Do you have any additional comments?**

### Comments

66. Of the 54 respondents to this question approximately:

- **52%** – had additional comments to make

67. Responses under this question were mainly used to reiterate the points made throughout the previous questions. The majority of comments referred either to the sharing of information or automatic referral to the police (issues which have already been discussed under Question 2).

68. Training implications were again raised, but this time in regards to implementing the GIRFEC framework and the carrying out of risk assessments. A few respondents also wanted clarification on what is meant by ‘appropriately qualified and trained’ in paragraph 19 of the guidance as this could have training implications for staff. The issue of training has been addressed under Question 3 above.

69. Similarly to the points raised in Question 5, there were concerns from a few respondents about the lack information and guidelines relating specifically to issues that affect LGBT children. The issue of how this should be addressed in the guidance has been covered under Question 5 above.

70. There was also a detailed response with regards to paragraphs 13, 14 and 15 in which it is claimed that these paragraphs give an erroneous impression about the numbers and experiences of children and young people taking part in under-age sexual activity; it was suggested that other research should be included within the guidance to rectify this. The issue of citing more research in the guidance has been addressed under Question 5 above.

71. Other issues raised within this section included asking for clarification around:

- single agency as opposed to a multi-agency approach;
- requests for more information on local protocols and who would be responsible for them, and;
- clarification on whether there is local variation on the way police forces deal with under-age sexual activity.

### Scottish Government Response

72. As noted, most of the issues raised under this question have been addressed elsewhere. Of those which have not:

- single vs. multi-agency approach: child protection typically takes place in a multi-agency context, and the procedures for handling this are described in greater detail in the National Child Protection Guidance – appropriate signposting has been strengthened at points in this guidance;

- local protocols: local protocols around child protection processes are determined by Child Protection Committees, as highlighted in this guidance and described in detail in the National Child Protection Guidance; and
- local variation among police forces: each police force will be operating to common standards within their local procedures – where national protocols exist, these have been identified in the guidance and the guidance sets out clear processes in how all police forces should handle cases of under-age sexual activity in a child protection context.

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