



**Guildhall Feoffment Community Primary
School**

Child Exploitation Policy

Approved by the Governing Body

Signed: _____

A handwritten signature in black ink, consisting of a large, stylized 'R' followed by a smaller, more complex signature.

Chair of Governors

Document Title	Child Exploitation Policy
Description of Document	Policy
Origin (School/Local Authority)	School
Version Date	11.6.24
Next Review Date	June 2025
Reviewed By	Full Governing Body

Contents

1.0 Introduction

2.0 What is Child Exploitation?

3.0 Child Sexual Exploitation (CSE)

4.0 Child Criminal Exploitation (CCE)

5.0 Risk Factors

6.0 Trafficking

7.0 Criminal Exploitation and County Lines

8.0 Serious violence

9.0 What to do if you have concerns that a pupil is being exploited

10.0 What to do if a young person discloses that they have been exploited

11.0 Local procedures

1.0 Introduction

Guildhall Feoffment Community Primary School puts the safety of the people we support as the highest priority and is committed to ensuring that children and young people are effectively safeguarded at all times, this includes in the offline and online worlds.

The school recognises the growing risk in relation to the exploitation of vulnerable young people, particularly those who are looked after or have physical, learning, emotional and/or mental health difficulties. For this reason, the school has high expectations in relation to the safeguarding of young people in our care, and the prevention of exploitation.

This policy must be read in conjunction with the School's Child Protection policy and Online Safety Policy.

All staff must be safely recruited and have all relevant checks completed and on file. Please see the Safer Recruitment Policy for further information.

2.0 What is Child Exploitation?

2.1 "Child exploitation refers to the use of children for someone else's advantage, gratification or profit often resulting in unjust, cruel and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimisation, oppression or ill-treatment." (Save the Children, 2020)

2.2 **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)** are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity. CSE and CCE involve an element of exchange and can still be exploitation even if the activity appears consensual. It can involve force

and/or enticement based methods of compliance and is often accompanied by violence or threats of violence. It is typified by some form of power imbalance in favour of those perpetrating the exploitation. CCE involves children who are UK residents and can also involve children who are trafficked into the UK in order to be criminally exploited. Children may be trafficked for criminal exploitation such as cultivating cannabis or committing street crimes. Victims are forced to provide labour to offenders for illegal purposes.

Different forms of harm often overlap, and perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation and sexual exploitation.

3.0 Child Sexual Exploitation (CSE)

3.1 Child sexual exploitation is a form of child sexual abuse and happens when anyone under the age of 18 is coerced, manipulated or deceived into taking part in sexual activity. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Child Sexual Exploitation can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge. For example, through others sharing videos or images of them on social media. It can affect any child, who has been coerced into engaging in sexual activities. Children may not realise they are being exploited, for example, they believe they are in a genuine romantic relationship.

It requires knowledge, skills, professional curiosity and an assessment which analyses the risk factors and personal circumstances of individual children to ensure that the signs and symptoms are interpreted correctly, and appropriate support is given.

3.2 **Child sexual exploitation is not a choice. It is a form of abuse.** It is important to remember that even when a relationship appears consensual, it may be an exploitative relationship. There can be an interchangeable status between victim and perpetrator. Young people can be both victim and perpetrator. Males and females can be both victims and perpetrators.

3.3 It can include assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. Child sexual exploitation involves perpetrators grooming children and young people and then forcing, enticing, threatening, and/or being violent towards them.

3.4 It is child sexual exploitation when the young person receives or thinks that they will receive something that they want or need in exchange for the sexual activity. This can take the form of gifts, drugs, alcohol, or if young people perceive that they are getting love, affection, protection or protecting their families/friends, increased status within their peer group or community. Young people are still victims even if they accept what the perpetrator is offering in exchange for sexual activity. Perpetrators take advantage of an imbalance of power.

3.5 While it may appear that some young people are 'choosing' to exchange sex to meet their needs, it is vital to remember that young people have limited options and so it is not a 'choice' as such but rather 'constrained choices' or 'survival strategies.'

4.0 Child Criminal Exploitation (CCE)

4.1 Criminal exploitation is child abuse where a child or young people under the age of 18 is coerced, controlled, manipulated or deceived into committing crimes. The victim may have been criminally exploited even if the activity appears consensual. It does not always involve physical contact; it can also occur through the use of technology. Criminal exploitation often happens alongside sexual or other forms of exploitation.

4.2 Criminal exploitation is common in county lines (See Section 7), but it is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft. Children can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

4.3 Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

4.4 Children involved in criminal exploitation often commit crimes themselves; their vulnerability as victims is not always recognised by adults and professionals, particularly older children. They are not **treated as victims despite the harm they have experienced. They may still have** been criminally exploited even if the activity appears to be something they have agreed or consented to.

4.5 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

5.0 Risk Factors

5.1 'Peer relationships are increasingly influential during adolescence, setting social norms which inform young people's experiences, behaviours and choices and determine peer status. These relationships are, in turn, shaped by, and shape, the school, neighbourhood and online contexts in which they develop. So if young people socialise in safe and protective schools and community settings, they will be supported to form safe and protective peer relationships. However, if they form friendships in contexts characterised by violence and/or harmful attitudes these relationships too may be anti-social, unsafe or promote problematic social norms as a means of navigating, or surviving in, those spaces' (Contextual Safeguarding Briefing).

5.2 Young people's peer groups, communities and social media activity are either key risk factors or key protective factors. For example, if a young person socialises with peers who have a positive influence on their thinking and behaviours, this will more than likely protect them within their communities and neighbourhoods. Likewise, if young people socialise with peers who are themselves involved in risky activities such as substance misuse, gangs or exploitative relationships, this too may impact on the young person's safety and wellbeing in the community and their neighbourhoods.

5.3 Key risk factors and vulnerabilities for young people:

- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories).
- Having a prior experience of neglect, physical and/or sexual abuse.

- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example).
- Going missing (for short or long periods).
- Substance misuse issues.
- Disengagement or absences from education.
- Lack of positive activities or hobbies.
- Gang-association/involvement and/or criminal behaviour.
- Recent bereavement or loss.
- Social difficulties, such as anti-social or violent behaviour.
- Social isolation, such as a lack of a friendship group or support network.
- Lack of insight into vulnerabilities and risks.
- Emotional and/or communication difficulties.
- Absence of a safe environment to explore sexuality, sexual identity or gender identity.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Low self-esteem/ Poor self-confidence.

5.4 Key risk indicators are:

- Unexplained money or gifts
- Going missing (for short or long periods)
- Regularly missing from school or education or not taking part in education
- Being distressed or withdrawn on return
- Disengaging from existing social networks
- Secrecy around new associations
- Additional mobile phones or concerning use of technology
- Sexual health problems or becoming pregnant
- Displaying sexual behaviours beyond expected development age
- Disclosure of rape/sexual assault (and reluctance to report)
- Changes in temperament/emotional wellbeing
- Drug or alcohol misuse
- Unexplained physical injuries.

5.5 Staff **must** remember this is not an exhaustive list. Staff must remain alert to possible signs of child sexual exploitation even if young people do not have any of the above risk indicators or vulnerabilities evident.

6.0 Trafficking

6.1 Child trafficking is when children are recruited, moved or transported for the purposes of exploitation, slavery, or abuse. children can be trafficked as part of sexual exploitation, criminal activity such as the selling of drugs, forced marriage, forced labour and benefit fraud. The Modern Slavery Act 2015 establishes that a person commits an offence if the person arranges or facilitates the travel of another with a view to being exploited. Wherever a child has been recruited, transported or transferred for the purpose of exploitation, they should be considered to be a victim of trafficking. This includes whether or not they have been forced, deceived or the child/young person believes that they are traveling willingly from one location to another, for example, where a child takes a bus or walks from one location to another for the purpose of exploitation.

6.2 Children who are trafficked will **usually** experience physical, sexual and emotional abuse. Children are groomed and then threatened, coerced or intimidated. Children who are victims of trafficking will suffer significant trauma and this can have a long-lasting detrimental impact on their mental health and emotional wellbeing.

6.3 Possible signs of trafficking include a child who:

- spends a lot of time doing household chores
- rarely leaves their house, has no freedom of movement and no time for playing
- is orphaned or living apart from their family, often in unregulated private foster care
- lives in substandard accommodation
- is not sure which country, city or town they're in
- is unable or reluctant to give details of accommodation or personal details
- might not be registered with a GP practice
- has no documents or has falsified documents
- has no access to their parents or guardians
- is seen in inappropriate places such as brothels or factories
- possesses unaccounted for money or goods
- has injuries from accidents
- gives a prepared story which is very similar to stories given by other children.

6.4 Staff must report any concerns regarding trafficking to the Designated Safeguarding Lead who can then follow local authority procedures for reporting and referring trafficking concerns.

6.5 Trafficking concerns must be immediately reported to the local authority, who will make a referral to the National Referral Mechanism (NRM). The National Referral Mechanism (NRM) is a framework for identifying victims of human trafficking and ensuring they receive appropriate care. When a child or young person is trafficked, a range of agencies may be involved such as the police, the UK Border Agency (UKBA), local authorities and non-governmental organisations such as charities. The NRM makes it easier for these agencies to co-operate, share information and facilitate access to advice, accommodation and support.

6.6 If there are immediate concerns that a pupil is being trafficked, staff must report this immediately to the Designated Safeguarding Lead and police.

6.7 For further information about reporting trafficking concerns or making a referral to the NRM, staff must speak to the Designated Safeguarding Lead and seek guidance from NSPCC Child Trafficking Advice Centre **0808 800 5000**.

7.0 Criminal Exploitation and County Lines

7.1 "County Lines" is a national term used by police and law enforcement to commonly describe the approach taken by gangs and criminal networks originating from urban areas, who travel to locations such as county or coastal towns to sell class A drugs. Gangs typically use children, young people and vulnerable adults to deliver drugs to customers and this often involves the child being subjected to deception, intimidation, violence, financial exploitation and grooming.

7.2 County lines relates to a group (not necessarily affiliated as a gang) establishing a network between an urban hub and county location, into which drugs (primarily heroin and crack cocaine) are supplied.

7.3 A mobile phone is used to communicate and take the orders for drugs (The 'county line'). The 'line' is controlled by a third party, and customers are 'introduced' to the drugs market via this phone line.

7.4 The group exploits young or vulnerable people to achieve the storage and/or supply of drugs, movement of cash proceeds and to secure the use of dwellings (commonly referred to as 'cuckooing').

7.5 The group, or individuals exploited by them, regularly travel between the urban hub and the county market, to replenish stock and deliver cash.

7.6 The group is inclined to use violence or threats and weapons, including knives, corrosives and firearms.

7.7 County Lines is a form of exploitation. Research says that some young people are more vulnerable than others to potential County Lines activity. Staff must ensure that they remain vigilant to potential risk factors in order to prevent risk from increasing and that they consider young people's vulnerabilities and risk factors as well as risk factors of the area.

7.8 Key risk factors for young people are:

- Young people/adults who have substance misuse issues living in 'cuckooed' premises.
- Young people who are looked after or who have been looked after and who are exploited for drug running purposes.
- Young people with mental health difficulties.
- Young people who go missing from their parents/carers.
- Young people who are withdrawn, who do not engage in school and have limited trusted adults around them. They are targeted by County Lines offenders due to their ability to operate without drawing attention to themselves.

7.9 Key risk factors of areas are towns:

- with high unemployment
- with high levels of social housing and deprivation
- which are close to a prison

- which have a probation centre nearby
- which have a drug treatment centre
- which have children's homes
- which have a train station or easy vehicle access

7.10 Further advice is provided in the Home Office guidance: [Criminal exploitation of children and vulnerable adults: county lines guidance](#) and [The Children's Society County Lines Toolkit](#)

8.0 Serious violence

8.1 All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include:

- a change in friendships or relationships with older individuals or groups
- a significant decline in school performance
- increased absence from school
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

8.2 Risk factors which increase the likelihood of involvement in serious violence, include:

- being male (although girls can be involved):
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery.

8.3 Further advice is provided in the Home Office guidance: [Preventing youth violence and gang involvement](#)

9.0 What to do if you have concerns that a pupil is being exploited

9.1 If there are immediate concerns for the pupil's safety, staff **must** immediately report their concerns to the Designated Safeguarding Lead. The police must be notified if there are immediate concerns for a pupil's safety or wellbeing because of exploitation. Staff must share any concerns that they have with the Designated Safeguarding Lead, who will then support them to refer their concerns to the local authority and the placing authority within one working day.

9.2 The Headteacher must ensure that a preventative approach is taken and that all pupils are educated around the risks associated with grooming, online safety, safe/healthy relationships, sex

including what consent means, and child sexual exploitation. This will be delivered at an age appropriate manner using PSHE curriculum.

9.3 Phones and internet use can be a key risk factor relating to child sexual exploitation. If there are known risks relating to child sexual exploitation, wherever possible staff must supervise internet use.

9.4 Any concerns relating to online grooming **must** be immediately documented on CPOMS and reported to the Designated Safeguarding Lead. Staff must be aware of the Web Filtering & Monitoring requirements within the Child Protection Policy.

9.5 Where risks or activities relating to possible exploitation are identified, staff **must** escalate this to the attention of the Designated Safeguarding Lead immediately. The placing authority **must** be notified within one working day unless there are immediate safeguarding concerns. It is recommended as best practice that all steps are taken to convene a multi-agency professional meeting to review any potential child exploitation risks and agree actions to be taken to safeguard the young person/young people.

9.6 Child exploitation risks must be reviewed within Safeguarding Team meetings. The purpose of this is to ensure that information is being shared and that proactive measures are being taken to safeguard the young person/young people.

9.7 The Home Office [Child Exploitation Disruption Toolkit](#) outlines useful tools that the police and other safeguarding professionals can use to disrupt the sexual and criminal exploitation of young people and emphasises the importance of information sharing and multi-agency working.

10.0 What to do if a young person discloses that they have been exploited

10.1 If a pupil discloses that they are being exploited, it is likely that this will be very traumatic for them. Staff must be aware of the potential impact that this could have on pupil's mental health and emotional wellbeing. Safety measures must be put in to support the pupil.

10.2 Staff must listen, ask open questions, write as much detail down as possible, and never promise to keep things secret. It is important that staff are open and honest with the pupil and show them unconditional positive regard. It is likely that the pupil will need reassurance that they are safe and that they are not to blame. **Staff must document all information onto CPOMS.**

10.3 After a pupil has disclosed, staff **must immediately** report the information to the Designated Safeguarding Lead who will then support the staff member to report the information to the police, local authority immediately.

10.4 Staff must ensure that the language they use is not 'victim-blaming'. Staff must show young people that they are non-judgmental and do not blame the young person for the abuse. If a young person has been sexually exploited by someone who they perceive as being their boyfriend, they may find it very traumatic to see this relationship as being exploitative and that the boyfriend did not love them as they perceived. It may take time for young people to understand and recognise that they have been exploited and so staff must be patient and support young people to get to this stage at the young person's own pace.

10.5 Designated Safeguarding Leads must ensure that staff know and understand the Local Safeguarding Partnership's procedures for safeguarding young people against exploitation.

10.6 Children who have been exploited will need additional support to help maintain their education.

10.7 Any concerns about staff, volunteers or contractors must be immediately reported to the DSP or deputy. Please see the school's Child Protection Policy for further information about reporting concerns.

11.0 Local procedures

The local procedures are:

County Lines - [Suffolk Police: Schools Intelligence Reporting Tool](#)

If you are concerned about anyone who might be at risk of becoming radicalised, or if you are worried about someone travelling to, or returning from abroad, then you should speak to the police on 101. **In an emergency, or to report a suspected terrorist incident, call the police on 999**

