Outcomes First Group

CHILD EXPLOITATION POLICY

Kestrel House School

CHILD EXPLOITATION POLICY

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1.0 INTRODUCTION

We put the safety of the children and young people we educate and support as the highest priority and are committed to ensuring that they are effectively safeguarded in all services at all times, this includes in the offline and online worlds.

We recognise the growing risk in relation to the exploitation of young people, those who are looked after or have physical, learning, emotional and/or mental health difficulties may be particularly vulnerable.

This policy must be read in conjunction with the setting's Safeguarding Policy, Protecting Children and Young People from Radicalisation and Extremism Policy, the Web Filtering & Monitoring Policy, and the Staying Safe Online Policy.

2.0 TRAINING AND RECRUITMENT FOR TEAM MEMBERS

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

In addition to the Introduction to Safeguarding and Safeguarding Children Foundation courses, all team members must complete the Exploitation - An Introduction course which includes information on Prevent and this must be refreshed every 3 years. These training courses are available on Shine.

3.0 WHAT IS CHILD EXPLOITATION?

3.1 "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 illtreatment." (UN/Save the Children)

3.2 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,(a) in exchange for something the victim needs or wants, and/or for (b) the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children and young people, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation Keeping children safe in education (KCSiE 2025)

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.

Settings in **Wales** should be familiar with:

Keeping children safe from child sexual exploitation (Welsh Government),
Child Criminal Exploitation (Safer Communities Wales) and
All Wales Practice Guide: Safeguarding children from child criminal exploitation

Settings in **Scotland** should be familiar with:
Child Protection: Child sexual and criminal exploitation (Scottish Government)

4.0 CHILD SEXUAL EXPLOITATION (CSE)

4.1 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 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. This includes 16- and 17-year-olds who can legally consent to have sex. Some children and young people 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 and young children to ensure that the signs and symptoms are interpreted correctly, and appropriate support is given.

4.2 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.

4.3 It can include assault by penetration (for example, rape or oral sex) or nonpenetrative 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 then forcing, enticing, threatening, and/or being violent towards them.

4.4 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.

4.5 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' but rather 'constrained choices' or 'survival strategies.'

5.0 CHILD CRIMINAL EXPLOITATION (CCE)

5.1 Criminal exploitation (CCE) 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. CCE often happens alongside sexual or other forms of exploitation.

5.2 CCE is common in county lines (See Section 8.0), 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.

5.3 Children and young people 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.

5.4 Children and young people involved in CCE 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 have been criminally exploited even if the activity appears to be something they have agreed or consented to.

5.5 Children and young people of any gender can be criminally exploited; the experience of girls who are criminally exploited can be very different to that of boys and the indicators may not be the same. However, perpetrators exploit children and young people for multiple and ever adapting purposes. Team members should always consider all possibilities and not let assumptions distract them from seeing

what is really happening. It is also important to note that any child who is being criminally exploited may be at higher risk of sexual exploitation.

Please also see: Gender and exploitation: dangerous assumptions

6.0 RISK FACTORS

6.1 '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, Carlene Firmann, 2017).

6.2 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.

6.3 Risk factors and vulnerabilities for children and young people can include:

- Having special educational needs or disabilities (SEND), certain medical or physical health conditions
- Emotional and/or communication difficulties
- 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 unexplained/persistent absences from education/training/employment
- 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 awareness of vulnerabilities and risks
- 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

The Independent Inquiry into Child Sexual Abuse (IICSA) explains more about the risks for Children with disabilities (Meeting the needs of particular groups of sexually exploited children, Part D.4, 2022)

People with autism spectrum conditions can be particularly vulnerable to exploitation; the Devonshire Safeguarding Partnership has developed a Preventing Exploitation Toolkit that includes information about these particular risks to help develop understanding and awareness.

6.4 Possible indicators that a child or young person is being exploited can include:

- Unexplained money or gifts
- Regularly absent from school or education or not taking part in education
- Going missing (for short or long periods)
- Being distressed or withdrawn on return
- Disengaging from existing social networks
- Secrecy around new associations
- Relationship with or hanging out with someone older than them
- Additional mobile phones or concerning use of technology
- Possession of hotel key cards/keys
- 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, being angry, aggressive or violent
- Drug or alcohol misuse
- Unexplained physical injuries
- Self-harming and feeling emotionally unwell
- Committing petty crimes like shoplifting or vandalism, carrying weapons

This is not an exhaustive list and team members **must** remain alert to possible signs of child exploitation even if young people do not have any of the above risk indicators or vulnerabilities.

Further information on risks and indicators can be found at:
NSPCC - Gangs and criminal-exploitation
Metropolitan Police - Advice and information Child Criminal exploitation

6.5 Children and young people with special educational needs or disabilities (SEND) and multiple complex co-occurring needs can be particularly vulnerable to exploitation. It can also be difficult for team members to distinguish between some of the signs of abuse and behaviour that is part of the child or young person's condition. Team members should be vigilant and alert to **changes** in their behaviour and always consider all possible causes of this.

7.0 TRAFFICKING

7.1 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.

7.2 Children and young people 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.

7.3 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 school or 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
- is permanently deprived of a large part of their earnings, required to earn a minimum amount of money every day or pay off an exorbitant debt
- has injuries from workplace accidents
- gives a prepared story which is very similar to stories given by other children.

Please see NSPCC - Child Trafficking for further information

7.4 Team members must report any concerns regarding trafficking to the Designated Safeguarding Lead (DSL)/ Safeguarding Lead.

For immediate attention call the police on 999. Crimestoppers: 0800 555 111 (anonymous reporting) For all local authority procedures for reporting and referring trafficking concerns see: Enfield Modern Slavery Team, Monday to Friday from 10am to 2pm on 020 3821 1763 or email modernslavery@enfield.gov.uk Haringey MASH: 020 8489 4470 In Brent, concerns about trafficking or prostitution can be reported to either the local Safer Neighbourhoods Team or the Anti-Social Behaviour team. If you believe a child is in immediate danger, call 999. For non-emergency situations, you can contact the Brent Family Front door to discuss concerns about a child's safety If you suspect a child in Hillingdon is experiencing or at risk of experiencing trafficking or modern slavery, telephone the Stronger Families Hub 01895 556006 In Ealing, if you suspect someone is being trafficked, you can report it to the Modern Slavery Helpline on 08000 121 700, the police on 101, or the Ealing Children's Integrated Response Service (ECIRS) on 020 8825 8000. ECIRS is a single point of contact for all

safeguarding concerns related to children and young people in Ealing. Havering Children's Multi-Agency Safeguarding Hub – 01708 433222. Modern Slavery Helpline (Opens in new tab) - 08000 121 700 Waltham Forest: UK Human Trafficking Centre Telephone: 0114 252 3891. Stay Safe East (Disabled people service): 020 8519 7241 text phone 07587 134 122 In Camden, safeguarding concerns related to trafficking, specifically modern slavery, should be reported to the Adult Social Care team by calling 020 7974 4444 and stating "Adult Social Care" If you suspect a child is at risk of trafficking or abuse, the Children and Families Contact Service can be reached at 020 7974 3317

7.5 **Trafficking concerns must immediately be reported to the local authority**, who will make a referral to the **National Referral Mechanism (NRM)**, which 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 police, UK Border Agency (UKBA), local authorities and nongovernmental 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.

7.6 **If there are immediate concerns that a child or young person is being trafficked, team members must report this immediately to the DSL/Safeguarding Lead and police.**

7.7 For further information about reporting trafficking concerns, team members must speak to the DSL /Safeguarding lead and seek guidance from NSPCC Child Trafficking Advice Centre **0808 800 5000** NSPCC Helpline

8.0 CRIMINAL EXPLOITATION AND COUNTY LINES

8.1 "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.

8.2 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.

8.3 A branded mobile phone line is established in "the market," to which orders are placed by introduced customers, with the phone line commonly (but not exclusively) being controlled by a third party, away from "the market".

8.4 The gang 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').

8.5 The gang, or individuals exploited by them, regularly travel between the urban hub and the county market, to replenish stock and deliver cash. The gang is inclined to use violence or threats and weapons, including knives, corrosives and firearms.

8.6 County Lines is a form of exploitation. Research shows that some young people are more vulnerable than others to potential County Lines activity. Team members 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.

Possible risk factors for young people include:

- substance misuse issues
- living in 'cuckooed' premises.
- being looked after or previously looked after
- having mental health difficulties.
- going missing from their home/care.
- Being withdrawn, not engaging in school/college and having limited trusted adults around them. They can be targeted due to their ability to operate without drawing attention to themselves.

Other key risk factors of areas are towns with high unemployment, high levels of social housing and deprivation; which are close to a prison or have a probation centre nearby; have a drug treatment centre, children's homes and/or a train station or easy vehicle access.

Further guidance and advice can be found at:
Criminal exploitation of children and vulnerable adults: county lines guidance (Home Office Guidance)
Preventing Child Sexual Exploitation | The Children's Society

9.0 SERIOUS VIOLENCE

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

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

9.2 The Serious Violence Strategy (Home Office, 2018) identified that 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.

Further advice is provided in Home Office Guidance: Preventing youth violence and gang involvement

10.0 USE OF LANGUAGE

It is very important for team members to be mindful of the language they use and the impact it can have on a child or young person that has suffered/is suffering exploitation. Team members must ensure they use language that is not 'victim-blaming' and show young people that they are non-judgmental and do not blame the young person for the abuse.

For further information please see:

Language Matters: Use of language in child sexual abuse & exploitation practice - Barnardo's

Making Words Matter: A Practice Knowledge Briefing - NWG Network

Challenging victim blaming language and behaviours - UK Council for Internet Safety

11.0 WHAT TO DO IF YOU HAVE CONCERNS THAT A CHILD OR YOUNG PERSON IS BEING EXPLOITED

11.1 If there are immediate concerns for the child or young person's safety, team members must inform the DSL/Safeguarding Lead straight away. The police must be notified if there are concerns for a child or young person's immediate safety or wellbeing because of exploitation.

Team members must share any concerns that they have with the DSL/Safeguarding Lead, who will then support them to refer their concerns to the local authority and the placing authority within one working day. The DSL/Safeguarding Lead must inform the Chair of Governors, the Regional Director/Operational Director and Director of Safeguarding/ Safeguarding Adviser by emailing safeguarding@ofgl.co.uk

11.2 The Headteacher or equivalent/Registered Manager must ensure that a preventative approach is taken and that all children and young people are educated around the risks associated with grooming, online safety, safe/healthy relationships, sex including what consent means, and child sexual exploitation.

11.3 Mobile phones and internet use can be a key risk factor relating to child exploitation. If there are known risks relating to child exploitation, wherever possible team members must supervise internet use. The School's Mobile and Smart Technology Policy sets out the procedures for the use of mobile phones in school and the Phones & Internet Access Policy in residential schools.

11.4 Any concerns relating to online grooming must be immediately documented on the appropriate electronic recording system and reported to the DSL/Safeguarding Lead. Team members must be aware of the Web Filtering & Monitoring Policy.

11.5 Where risks or activities relating to possible exploitation are identified, team members must escalate this to the attention of the DSL/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/s.

11.6 Child exploitation risks must be reviewed within governance meetings and within Senior Leadership 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.

11.7 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.

Please also see Multi-agency practice principles - child exploitation and extra-familial harm

The NWG Network provides Information to help educate and prevent child exploitation and abuse across the UK. The Group has membership of the network for all team members which can be accessed through the chat/help facility on the Welcome to the NFG Network page, or by emailing network@nwgnetwork.org

12.0 WHAT TO DO IF A CHILD OR YOUNG PERSON DISCLOSES THEY HAVE BEEN EXPLOITED

12.1 If a child or young person discloses that they are being exploited, it is likely that this will be very traumatic for them. Team members must be aware of the potential impact that this could have on the child's/young person's mental health and emotional wellbeing. Safety measures must be put in to support them.

12.2 Team members must listen, ask open questions, write as much detail down as possible, and never promise to keep things secret. It is important that team members are open and honest with the child/young person and show them unconditional positive regard. It is likely that they will need reassurance that they are safe and that they are not to blame. **Team members must document all information on the electronic recording system** (e.g. Sleuth).

12.3 After a child or young person has disclosed, team members **must immediately** report the information to the DSL/Safeguarding Lead who will then support the team member to report the information to the police, local authority and placing authority immediately.

Integrated education and care settings

When a concern is reported **at the school/college:**

- it must be recorded on the school's/college's electronic recording system
- the DSL will liaise with the Home Safeguarding Lead and share the relevant information.
- The Home Safeguarding Lead will make a note on the child's file at the Home.

When a concern is reported **at the Children's Home:**

- It must be recorded on the Home's electronic recording system
- the Safeguarding Lead will liaise with the DSL
- The DSL will make a note on the child's file at the school/college.

12.4 If a child or young person has been sexually exploited by someone who they perceive as being their boyfriend or girlfriend, they may find it very traumatic to see this relationship as being exploitative and that the boyfriend or girlfriend did not love them as they perceived. It may take time for young people to understand and recognise that they have been exploited therefore team members must be patient and support the young person to get to this stage at their own pace.

12.5 DSLs/Safeguarding leads must ensure that team members know and understand the Local Safeguarding Partnership's procedures for safeguarding young people against exploitation.

12.6 Children and young people who have been exploited will need additional support to help maintain their education. Please contact the in-house Clinical Team for further support.

12.7 Any concerns about team members must be immediately reported to the DSL or deputy/Safeguarding Lead. If neither is available, the team member must report the information to the Headteacher, Principal or equivalent or Regional Director/Operational Director, as appropriate. Please see the setting's Safeguarding Policy for further information about reporting concerns.

13.0 LOCAL PROCEDURES

The local procedures are:

13.1 All team members must be aware of the local arrangements for safeguarding relevant to the school or college in which they work;

13.2 The local arrangements for Kestrel House School are as follows:

13.3 Kestrel House School safeguarding arrangements are in line with local safeguarding partnership arrangements. The Haringey safeguarding partnership consists of the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police force in the local authority area)

13.4 The Local Authority Designated Officer or local equivalent is: Haringey - 020 8489 2968, LADO@haringey.gov.uk

13.5 All safeguarding referrals must be reported to the child or young person's home local authority: Referrals for children and young people under 18 will be dealt with under the Children's safeguarding arrangements, whereas those 18 and above will be dealt with under the Adult safeguarding arrangements.

Brent 020 8379 5555 **Camden** 020 7974 3317 (out of hours: 020 7974 4444) **Ealing** 020 8825 8000 **Enfield** 020 8379 5555 **Haringey** 020 8489 4470 / 020 8489 4533 **Havering** 01708 433222 (out of hours: 01798 433 999) **Hillingdon** 01895 556006 **Waltham Forest** 020 8496 2310 (out of hours: 020 8496 3000)

13.6 The local authority safeguarding referral procedure for Haringey is that a telephone contact must be made to 020 8489 4533 followed by a written referral via the online portal within 24 hours.
We acknowledge that pupils at Kestrel House School come from a wide range of London Boroughs, and whilst local procedures may vary slightly, all are part of the London Safeguarding Children Partnership and follow their guidance.
Further information on the referral procedure for the local authorities we currently partner with can be found on the linked websites below and in their publicly available Threshold Guidance: • Brent • Camden • Ealing • Enfield • Havering • Hillingdon • Waltham Forest

13.7 For all referrals regarding radicalisation should be raised through the governments Prevent policy. Referrals are sent to preventreferrals@met.pnn.police.uk with the relevant local authorities Prevent teamed copied in.

13.8 For all referrals regarding exploitation concerns referrals must be made to Multi-Agency Safeguarding Hub (MASH) for assessment following the protocol in 13.6.

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