OFG Education

Hillingdon Grange SCHOOL

CHILD EXPLOITATION POLICY

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TERMINOLOGY

- "Our teams" and" "team member/s" include everyone working in Outcomes First Group's settings and services in a paid or unpaid capacity, including employees, consultants, agency staff, trainees and contractors. For Blenheim schools, volunteers are included in this definition.
- "Parents and carers" refer to the person or -people with legal parental responsibility for the child/young person
- "Students" refers to all children and young people being educated and supported at the setting or service

1.0 INTRODUCTION

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

- Safeguarding Policy
- Protecting Children & Young People from Radicalisation & Extremism (Prevent Duty) Policy
- Web Filtering & Monitoring Policy
- Staying Safe Online Policy
- Mobile & Smart Technology Policy
- Safer Recruitment 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 ill-treatment." (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 of any age, sex, ethnicity, disability, sexual orientation or gender identity and can include those who have been moved (commonly referred to as trafficking) for the purpose of exploitation Keeping children safe in education (KCSiE) 2026)

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)

3.3 Exploitation can be facilitated through technology and can take place wholly online. Children and young people may be groomed, coerced, blackmailed or exploited through social media, messaging applications, livestreaming services, gaming platforms, image sharing platforms or other online environments. Team members must remain alert to the risks of online grooming, financially motivated sexual extortion and the misuse of technology to facilitate exploitation.

3.4 Extra-Familial Harm - We recognise that harm can occur outside the home and family environment. Extra-familial harm includes child sexual exploitation, child criminal exploitation, serious violence, harmful sexual behaviour, abuse within peer relationships, online abuse and other forms of abuse occurring within social groups, schools, colleges, communities and online environments.

Team members should consider the influence of peer groups, social networks, neighbourhoods and online environments when assessing safeguarding risks and planning interventions.

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 students 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.’

4.6 Child sexual exploitation may include financially motivated sexual extortion, where offenders threaten to share sexual images of a child unless money, further images or other demands are met.

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.

5.6 Children and young people may be exploited by their peers as well as adults. Team members should recognise that exploitation can involve young people recruiting, controlling, or facilitating the exploitation of other young people whilst also being exploited themselves.

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 While any child or young person can be vulnerable to abuse, exploitation and harm, some factors may increase their vulnerability, including:

Individual needs and characteristics

- Having Special Educational Needs and/or Disabilities (SEND), being neurodivergent, or having speech, language and communication needs.
- Having a medical condition, physical disability or complex health needs.
- Experiencing emotional or mental health difficulties.
- Low self-esteem, poor self-confidence or limited awareness of risks and personal vulnerabilities.
- Questioning their sexual orientation, gender identity or wider identity without access to appropriate support.

Family and home circumstances

- Being looked after, previously looked after or having experienced interrupted care arrangements.
- Experiencing neglect or physical, emotional or sexual abuse.
- Living in an unsafe or unstable home environment, including where there is domestic abuse, parental substance misuse, mental ill-health or criminality.
- Being a young carer.
- Family members or others connected to the child being involved in adult sex work.

Social, educational and environmental factors

- Social isolation, exclusion or a lack of positive friendships and support networks.
- Disengagement from education, training or employment, including persistent or unexplained absence.
- Spending significant periods of unsupervised time online.
- Having limited access to positive activities, hobbies or trusted adults.
- Experiencing economic hardship, homelessness or insecure accommodation.

Risk-taking behaviours and exploitation

- Going missing from home, school, college or care.
- Substance misuse.
- Gang association, criminal behaviour or criminal exploitation.
- Connections with others who are experiencing exploitation, including child sexual exploitation.
- Anti-social, aggressive or violent behaviour.

Life experiences

- Experiencing bereavement, loss or other significant traumatic events.

These factors do not mean that a child or young person is experiencing abuse, exploitation or harm. However, they may increase vulnerability and should be considered alongside other information, professional curiosity and the school's safeguarding procedures**.**

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)

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

Children and young 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.

When assessing exploitation concerns, team members will consider the vulnerabilities of the individual student and the contexts in which harm is occurring, including peer groups, online environments, transport routes, neighbourhoods, community locations, and relationships with adults outside the family.

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.

6.5 Children and young people with 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.

6.6 Exploitation risks continue to evolve. Children and young people may be targeted both online and offline through social media, gaming platforms, messaging services, peer networks and organised criminal groups. Team members must remain professionally curious and alert to emerging patterns of exploitation, recognising that exploitation may not always be immediately visible and that children may not recognise themselves as victims.

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.

Child trafficking should be viewed within the wider context of modern slavery and exploitation. Children cannot consent to their own 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.

Team members should recognise the strong links that can exist between serious violence, child criminal exploitation, county lines activity, online harms, substance misuse and exploitation by peers or adults.

Please see NSPCC - Child Trafficking for further information

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

The local authority procedures for reporting and referring trafficking concerns are....
[Please insert]

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 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.

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 and police.

7.7 For further information about reporting trafficking concerns, team members must speak to the DSL 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
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 students 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 student that has suffered/is suffering exploitation. Team members must ensure they use language that is not 'victim-blaming' or non-judgmental and in no way puts any blame on the young person for the abuse.

For further information please see:
Language Matters - Barnardo's
Making words matter - A practice knowledge briefing
Challenging victim blaming language and behaviours - UKCIS

11.0 WHAT TO DO IF YOU HAVE CONCERNS THAT A STUDENT IS BEING EXPLOITED

11.1 If there are immediate concerns for the student's safety, team members must inform the DSL 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, who will then support them to refer their concerns to the local authority and the placing authority within one working day. The DSL must inform the Chair of Governors, the Regional Director/Operational Director and the Director of Safeguarding/ Safeguarding Adviser by emailing safeguarding@ofgl.co.uk

11.2 The Headteacher/ Principal must ensure that a preventative approach is taken and that all students 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.

11.4 Any concerns relating to online grooming must be immediately documented on the appropriate electronic recording system and reported to the DSL. 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 immediately. The local authority/ 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 student/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 DSLs and Senior Leaders should analyse emerging themes, trends, and patterns relating to exploitation and use this information to inform safeguarding practice, curriculum content, supervision levels, and risk assessments.

11.8 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 STUDENT DISCLOSES THEY HAVE BEEN EXPLOITED

12.1 If a student 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 student's mental health and emotional wellbeing. Safety measures must be put in to support them.

12.2 Responses to exploitation concerns will be trauma-informed, child-centred and strengths-based. Team members will seek to understand the impact of trauma on behaviour, engagement and emotional wellbeing and avoid responses that could unintentionally blame or re-traumatise the student.

12.3 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 student 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).

12.4 After a student has disclosed, team members **must immediately** report the information to the DSL who will then support the team member to report the information to the police, local authority and placing authority immediately.

12.5 If a student 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.

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

12.7 Students who have been exploited will need additional support to help maintain their education. Please contact the in-house Clinical Team for further support.

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

13.0 LOCAL PROCEDURES

13.2 Local Exploitation Risks

- Due to the level of supervision required by our pupils the direct level of in-person risk is lowered outside of the home environment.
- The local areas to all sites have County Lines activity
- Pupils lack of awareness and understanding of risk make them vulnerable to online exploitation concerns

13.3 Local Contextual Safeguarding Assessment

Due to the nature of the pupils attending Hillingdon Grange School, the level of supervision required means that the risks to our pupils externally are low. However, the school will always remain vigilant to any possible risks or changes in behaviour or language used by a pupil.

Online Contexts:

- Some of our pupils have access to online gaming and social media/video platforms. This is not always supervised and there is a risk to pupils where internet controls are not implemented at home. Devices are often used as a calming mechanism.

Peer Contexts:

- Online friendships, especially to some of our older pupils can could be of concern due to some of our pupil's lack of awareness and understand of risk.

Adult Contexts:

- The local areas to all of the sites have a very diverse range of residents and beliefs. This can include extremist views.

13.4 School Level Indicators

The purpose is to identify any emerging exploitation themes.

13.5 Prevention and Curriculum

Pupils will be educated in a manner suitable to their age and ability about:

- Healthy relationships
- Consent
- Grooming
- Online exploitation
- County lines
- Serious violence
- Trusted adults

13.6 Multi-Agency Arrangements

- Any concerns regarding potential exploitation will immediately be reported to the Police and Local Authority
- The school will always attend professionals meetings
- Regular reviews are carried out by the DSL to identify any patterns of behaviour or language and will raise a referral with the local MASH team.

13.7 Annual DSL Reflection

As part of the annual Safeguarding Review the following information will be reviewed:

- What exploitation concerns have emerged this year?
- What themes or patterns have been identified?
- What changes are required to improve prevention, identification or response next year?

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