

Policy and Procedure on Children at Risk of Child Sexual Exploitation (CSE)

Cambian Dilston College


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1. Monitoring and Review

- 1.1. This policy will be subject to continuous monitoring, refinement and audit by the Head of Service.
- 1.2. The Proprietor will undertake a formal review of this policy for the purpose of monitoring and of the efficiency with which the related duties have been discharged, by no later than one year from the date shown below, or earlier, if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.



Jeremy Wiles
Group Executive Director- Children's Services



Marie Flatman
Principal
October 2024

2. Terminology

2.1. Our aim is to use consistent terminology throughout this policy and all supporting documentation as follows:

‘Establishment’ or ‘Location’	This is a generic term which means the Children’s Home/school/college. Cambian Dilston College is a college.
Individual	This means any child or young person under the age of 18 or young adult between the ages of 18 and 25. At Cambian Dilston College we have [young people/adults attending and/or residing primarily between the ages of 16 and 25, however this can be extended to meet individual needs.
Head of Service	This is the senior person with overall responsibility for the college. At Cambian Dilston College this is the Principal who is Marie Flatman. The Registered Manager is Rick Johnson.
Key Worker	Members of staff that have special responsibility for Individuals residing at or attending the Establishment.
Parent	Parent or person with Parental Responsibility
Regulatory Authority	Regulatory Authority is the generic term used in this policy to describe the independent regulatory body responsible for inspecting and regulating services. At Cambian Dilston College this is [Ofsted/DfE/CQC.
Social Worker	The worker allocated to the child/family. If there is no allocated worker, the Duty Social Worker or Team Manager is responsible.
Safeguarding Authority	Children’s Social Care, Safeguarding Partners, Local Safeguarding Adults Board [LSAB] – England.
LADO	Local Authority Designated Officer
Placing Authority	The local authority/agency responsible for placing the child or commissioning the service
Local Authority	The local authority for the location. Our local authority is Northumberland
Staff	All staff working at the Location including employed staff, students on placement, contractors, agency staff, volunteers and proprietors.

3. Legislation, statutory and non- statutory guidance

- 3.1. [Working Together to Safeguard Children \(2018\)](#)
- 3.2. [Keeping Children's Safe in Education 2021](#)
- 3.3. [DfE - Child sexual exploitation - Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation \(February 2017\)](#) which replaced the 2009 guidance Safeguarding children and young people from sexual exploitation.
- 3.4. [Sexual Offences Act 2003](#)
- 3.5. [The Modern Slavery Act 2015](#)

4. Definitions

- 4.1. **Child sexual exploitation (CSE)** is a crime with devastating and long lasting consequences for its victims and their families. Childhoods and family life can be ruined and this is compounded when victims, or those at risk of abuse, do not receive appropriate, immediate and on-going support. The first response to children, and support for them to access help, must be the best it can be from social workers, police, health practitioners and others who work with children and their families.
- 4.2. CSE is a form of **child sexual abuse**. Sexual abuse may involve physical contact, including 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). This definition was updated in 2017 after a nationwide consultation and it is included in KCSIE2021.
- 4.3. Like all forms of child sexual abuse, **child sexual exploitation**:
 - can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex; some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.
 - can still be abuse even if the sexual activity appears consensual;
 - can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
 - can take place in person or via technology, or a combination of both;
 - can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
 - may occur without the child or young person's immediate knowledge (through others sharing videos or images of them on social media,
 - can be perpetrated by individuals or groups, males or females, and children or adults. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
 - is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender,

sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

- 4.4. Perpetrators **‘groom’** a child for sexual exploitation in a process designed to break down the child’s defences and existing relationships with family and friends to establish control.
- 4.5. **Non – consensual sharing of nudes or semi- nudes images and/or videos** is the act sending, receiving, or forwarding sexually explicit messages, photographs, or images, primarily between mobile phones. It may also include the use of a computer or any digital device. This is a remote form of CSE.

5. Wider context of Child sexual exploitation

- 5.1. Child sexual exploitation is a complex form of abuse and it can be difficult for those working with children to identify and assess it. The indicators for child sexual exploitation can sometimes be mistaken for ‘normal adolescent behaviours’. 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. Even where a young person is old enough to legally consent to sexual activity, the law states that consent is only valid where they make a choice and have the freedom and capacity to make that choice. If a child feels they have no other meaningful choice, are under the influence of harmful substances or fearful of what might happen if they don’t comply (all of which are common features in cases of child sexual exploitation), the child is unable to offer consent, regardless of their age.
- 5.2. Young People Are Not Able To Consent To Their Own Abuse. The fact that a young person is 16 or 17 years old and has reached the legal age of being able to consent to sex is not a sign that they are no longer at risk of, or able to be a victim of, child sexual exploitation. These young people are still children and as such can still be victims of child sexual exploitation. They have a right to support and protection from harm. We all have a responsibility to understand the dynamics of sexual abuse and children do not and cannot make a “lifestyle choice” that involves their consent to their own abuse and exploitation. One of the frightening aspects of child sexual exploitation is that the perpetrators will use the common and natural vulnerabilities of teenagers in order to groom and then entice them into exploitative relationships and situations.

Gangs and Groups

- 5.3. Professionals working with children and young people need to be aware of the context of sexual exploitation within the gangs and groups arena. In some areas, to be a member of the gang may not only seem attractive to a young person; it is essential. Being a member of a gang may provide a young person with a feeling of not only belonging, status and respect but also protection.
- 5.4. Recent research has identified that within many gangs, sexual violence (usually but not exclusively towards female members) is the norm. Sexual exploitation may occur for example as part of the initiation process or it also may be used in return for protection. One of the most disturbing aspects is that members (or perceived enemies) of a gang may be raped (single/multiple perpetrator) as a punishment or as a weapon in conflict.

Child Sexual Exploitation Grooming Models (from PACE-Parents against Child Sexual Exploitation)

- 5.5. ‘Grooming’ is like a process of recruitment and the victims are introduced into a lifestyle, which they are made to believe is normal, but which is actually abusive. This may take place online or offline and could include violence, lies, blackmail, or threats. Once groomed, the child is expected to participate in sexual activities, often in exchange for something such as alcohol, gifts, money, affection, drugs, or a place to stay. There are different models of grooming

– children might experience exploitation at parties, by groups of older men or (less often) women, as part of a gang, or even by friends their own age.

Peer on peer exploitation

- 5.6.** Children are sexually exploited by peers, who are known to them at school/college or associated care home, in the neighbourhood or through mutual friends. Exploitation through befriending and grooming children and young people are befriended directly by the perpetrator (in person or online) or through other children and young people. This process may begin with a girl (or boy) being targeted and befriended by a young boy or girl usually known to her as an equal, i.e. a classmate, a friend of a sibling, or a neighbour. This introductory young person later introduces the child to either one or more older men, whom s/he may describe as an older sibling or cousin. The older men offer the child/young person attention in the form of gifts, flashy cars, cigarettes, alcohol and drugs. To the child/young person it is new and exciting. The older men treat the child/young person as an adult and deliberately portray her/his parents as unreasonable and overly-strict, should they seek to intervene.
- 5.7.** All staff should understand, that even if there are no reports in their schools/colleges/associated homes it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse they should speak to their designated safeguarding lead (or deputy).
- 5.8.** It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- 5.9.** More information about Peer on peer and reporting procedure has been provided in the 25.00 Child Protection and Safeguarding policy and procedure.

Sexual violence and sexual harassment between children in schools and colleges

- 5.10.** Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 5.11.** Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.
- 5.12.** It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- 5.13.** More information about sexual violence and sexual harassment has been provided in 25.00 Child Protection and safeguarding policy and procedure.

The ‘boyfriend’/pimp model

- 5.14.** Perpetrators target children posing as ‘boyfriends’, showering the child with attention and gifts to cause infatuation. They initiate a sexual relationship with the child, which the child is expected to return as ‘proof’ of her/his love or as

a way of returning the initial attention and gifts. The child is effectively told that they owe the perpetrators money for cigarettes, alcohol, drugs, car rides etc. and that sexual activities are one way of paying it back.

The 'party' model

5.15. This type of exploitation takes place when the parties are organised by groups of men to lure young people. Young people are offered drinks, drugs and car rides often for free. They are introduced to an exciting environment and a culture where sexual promiscuity and violence is normalised. Parties are held at various locations and children are persuaded (sometimes financially) to bring their peers along. Children are also encouraged to associate with others via Facebook, Bebo, ooVoo, etc. The parties may be held some distance from the child's home, enabling the perpetrators to force the child to have sex in return for a lift home. Drugs and alcohol are used to suppress the children's resistance. Images may be taken of them without their clothes for purpose of future bribery.

Trafficking and Modern Slavery

5.16. Child trafficking and modern slavery are forms child abuse. Many children and young people are trafficked into the UK from other countries and children are also trafficked around the UK.

5.17. Children (under 18) are considered to be victims of trafficking. Trafficking encompasses the recruitment, transportation, transfer, harbouring or receipt of young persons by means of threat, use of force, coercion, abduction, fraud, deception, abuse of power or position of vulnerability. Trafficking can also occur where a person who has control of the young person is given or receives payments or benefits to achieve consent.

5.18. Trafficking is when a perpetrator arranges or facilitates the travel of a child for the purposes of sexual exploitation either during or after the travel.

5.19. Travel entails young people who are living within the UK being trafficked from one geographical area to another for the purposes of sexual exploitation. This may be:

- Arriving or entering, any country
- Departing from any country
- Travelling within a country (this may be moving from one town/city to another)

5.20. It may not be obvious that a child has been trafficked but there may be particular signs as outlined above.

5.21. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Child abduction and community safety incidents

5.22. Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

5.23. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by

local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Who is Vulnerable to Child Sexual Exploitation

- 5.24.** One of the most frightening aspects of child sexual exploitation is that all children and young people are vulnerable to being exploited in this way. The perpetrators of sexual exploitation are able to target teenagers in particular purely by virtue of them being teenagers; the normal developmental process of a young person going through adolescence does give the perpetrator many opportunities to groom and exploit such a young person.
- 5.25.** For example, as we know from our own and our own children's adolescence, teenagers may:
- experiment and take risks
 - perceive risks differently to adults
 - reject authority and control
 - ignore good advice
 - be vulnerable to flattery and be naive
 - fail to recognise risk or feel that they are invincible
 - be secretive
 - be in conflict with adults in their lives who have their best interests at heart.
- 5.26.** All of the above "normal" characteristics of most teenagers can provide perpetrators of child sexual exploitation with plenty of opportunity to groom and manipulate children and young people.
- 5.27.** However, although all of our children and young people are at risk to being sexually exploited, there are some groups that are particularly vulnerable. In particular, Looked After Children are not only more vulnerable to being victims of CSE but they are more likely to be targeted as a result of their vulnerability. Young people leaving care

are particularly at risk due to their significant change in circumstances and the inherent vulnerabilities in this. This is particularly the case for those young people who may have alienated adults around them prior to leaving care.

5.28. Although the majority of victims of child sexual exploitation are girls and young women, boys and young men are also targeted by perpetrators of sexual exploitation.

Vulnerability Indicators

- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, and parental criminality)
- History of abuse (including familial child sexual abuse, risk of forced marriage, risk of 'honour'-based violence, physical and emotional abuse and neglect)
- Recent bereavement or loss
- Gang association either through relatives, peers or intimate relationships (in cases of gang associated CSE only)
- Attending school with young people who are sexually exploited
- Learning disabilities, communication difficulties
- Unsure about their sexual orientation or unable to disclose sexual orientation to their families
- Friends with young people who are sexually exploited
- Homeless
- Lacking friends from the same age group
- Living in a gang neighbourhood
- Living in residential care
- Living in hostel, bed and breakfast accommodation or a foyer
- Low self-esteem or self-confidence
- Young carer

Indicators of Child Sexual Exploitation

- Go missing for periods of time or regularly come home late; and regularly miss school or education or do not take part in education. Physical injuries
- Drug or alcohol misuse
- associate with other children involved in exploitation
- Involvement in offending
- Repeat sexually-transmitted infections, pregnancy and terminations
- Change in physical appearance

- Evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites
- Estranged from their family
- Replace friendship group with others
- Receipt of gifts, money or possessions from unknown sources
- Recruiting others into exploitative situations
- Suffer from changes in emotional well-being; Self-harm
- Thoughts of or attempts at suicide
- Little or no acknowledgment of the risks associated with camera phones and what can happen to images

5.29. Children who have been exploited will need additional support to help maintain them in education.

5.30. Further information on signs of a child's involvement in sexual exploitation is available in the Home Office guidance: [Child sexual exploitation: guide for practitioners](#).

5.31. Evidence shows that any child or young person displaying several vulnerabilities from the above lists should be considered to be at high risk of sexual exploitation. Any of the above indicators that become apparent in any child or young person should be raised and logged as a safeguarding concern using the reporting procedures described in 25.00 Child Protection and Safeguarding policy.

Use of Technology in CSE

5.32. The role technology plays in CSE cannot be underestimated. We now live in a "connected" world and it is vital that if the adults around young people are to protect and educate them, they must be aware of the various forms of technology that facilitate CSE. These include the internet, smart phones, apps such as Facebook, Twitter, Snapchat, Instagram, Tumblr, chat sites, photo sharing applications, messaging applications, all of which can enable behaviours

such as sexting. The above list is by no means exhaustive as new forms of communication and mobile phone applications are being designed all the time.

- 5.33.** Whilst, as adults, we ourselves may not use these forms of communication, we must constantly raise our awareness of them in order to safeguard our young people. The NSPCC's Share Aware campaign/website is recommended to all adults whose children "go online".

<http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/share-aware/>

6. Purpose (Why)

- 6.1.** Cambian Group is committed to providing an environment for Individuals, where they feel safe and are kept safe. All staff recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether or not their role has direct contact or responsibility for Individuals.
- 6.2.** All children and young people at Cambian Locations including those under the age of 18 have a right to be safe and should be protected from harm.
- 6.3.** All children and young people have an absolute right to a childhood free from any type of abuse, neglect or exploitation.
- 6.4.** All children and young people have an equal right to protection from abuse, neglect or exploitation and a responsibility not to abuse or exploit others.
- 6.5.** Children and Young people are best kept safe when professionals work effectively together and share responsibility for protective action.
- 6.6.** Where there are concerns about a child or young person's safety, unconditional confidentiality cannot be guaranteed and should not be offered. When a young person has suffered abuse, neglect or exploitation in the past, information on this should be shared only on a 'need to know' basis.
- 6.7.** Staff should be proactive and take positive steps to inform children and young people of their rights to safety and protection from exploitation and the options available to express their fears or concerns.
- 6.8.** When children or young people make allegations of abuse or neglect or exploitation they should always be listened to, have their concerns taken seriously and where appropriate, thoroughly investigated.
- 6.9.** All children and young people involved in exploitation are being sexually, physically and emotionally harmed, both in the short term and long term.
- 6.10.** Exploited children and young people do not make informed choices, but are coerced, enticed, manipulated or are desperate because they see no alternative.
- 6.11.** All staff have a right to training and appropriate levels of supervision and support.

7. Policy (What)

- 7.1.** The implementation and management of this Policy is the overall responsibility of the Heads of Service/Registered Managers/other Heads of Departments.
- 7.2.** Cambian Group and all employed therein have a responsibility to ensure that all children and young people are protected from harm and exploitation and that their welfare is promoted. This policy ensures staff are able to understand their individual duty of care, be accountable and ensure all Legislative Requirements are met.
- 7.3.** To ensure that the individuals cared for at Cambian are properly protected and that their welfare is promoted.

- 7.4. To ensure that Cambian complies with the policies and procedures of the Local Safeguarding Children's Boards.
- 7.5. All staff have the responsibility to be aware of the issues of Child Sexual Exploitation and a duty to report and refer any concerns. The Head of Service/Registered Manager/Head teacher has overall responsibility to action any concerns raised and in the absence the Registered Manager the Head of Service/Head Teacher will action concerns.
- 7.6. Staff at Cambian will ensure that all young people are aware of their absolute unconditional right to be kept safe and free from harm. Key carers will work with individual young people on their personal safety and protection and provide them with advice, assistance, guidance and support on how to keep themselves safe in future. Additionally, key carers and home managers will liaise closely with allocated social workers and designated police officers to further safeguard and protect young people through agreed (written) protection plans.
- 7.7. Key carers and others will also act as 'Safe Adults' to whom young people can turn for help if they have been harmed, or fear they may be harmed in future. They will also inform young people of other safeguarding options including the names and phone numbers of the local Safeguarding Authority, relevant regulatory body inspector as well as Child line and the local police.
- 7.8. It is also important for key carers to emphasise with each young person their responsibilities not to harm or exploit any of the other young people with whom they live and to treat them with dignity and respect (cross – reference with Anti-Bullying Policy).
- 7.9. Due to the ever-changing remit of Child Sexual Exploitation this policy will be reviewed yearly.

8. Procedure (How)

- 8.1. All allegations or concerns in relation to abuse, concerns of trafficking, neglect and/or sexual exploitation will be taken seriously and managed in line with Local Safeguarding Procedures. Every school/college and home has a copy of the locally agreed Child Sexual Exploitation Procedures and each member of staff has familiarised themselves with the contents.
- 8.2. Where relevant staff receive training on Child Sexual Exploitation to ensure they remain competent and equipped to meet the protection needs of the young people they look after. All staff receive regular supervision in which issues in relation to the management of child sexual exploitation concerns are addressed and any training needs identified.
- 8.3. If young people choose to disclose their exploitation to staff it is important that this is properly recorded.
- 8.4. A proper record includes details of the date, time, location and circumstances in which the disclosure was made in addition to as near as possible a verbatim account of what the young person said. Staff will not 'translate' the young person's account into adult language nor censor it nor put their own interpretation on what has been alleged. In addition, it should be legible, clear, concise, and free from jargon and abbreviations, separate fact from opinion and signed.
- 8.5. The record should be made as soon as practicably possible after the information has been received, and at the latest by the end of the shift on which the situation arose.
- 8.6. Any subsequent information relating to the concern will be recorded and passed on to the Designated Safeguarding Lead/DSL Deputy.
- 8.7. Similarly if staff receive information from a third party the same procedure should be followed. If staff become concerned about possible exploitation through their observations of children and young people in contact with other adults (professional or otherwise) they should record the details of the date, time, location and circumstances in which the concerns arose and what it was about the interaction that caused concern. Again this

record should be made as soon as possible after the incident causing concern, and no later than the end of the day. The information should be passed immediately to the Designated Safeguarding Lead/DSL Deputy.

- 8.8.** If staff receive information from any source that a child or young person has experienced exploitation or may be at risk of such then they have a duty to pass this information to the Designated Safeguarding Lead/DSL Deputy. If the concerns are about the DSL or any other Senior member of the Management or Leadership team, staff must follow steps described in 25.00 Child Protection and Safeguarding policy and procedure – section 6.
- 8.9.** If young people or non-professional adults wish to share such information with staff they need to be made aware that it will not be possible to guarantee confidentiality. Staff can reassure informants however, if the allegation is from a third party, that the source of the information can remain anonymous.
- 8.10.** When there are historical or current child sexual exploitation concerns about a child or young person this information will be shared on a 'need to know' basis with the minimum number of people necessary to ensure the young

person's safety and welfare. People who are informed will receive only the minimum amount of information necessary to enable them to implement the child or young person's placement plan.

8.11. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police (KCSIE2021).

8.12. All staff will take steps to ensure that confidentiality of information is maintained by refraining from talking indiscreetly about the young person's past history and by keeping records in a safe and secure place with access strictly limited.

8.13. The Sexual Offences Act 2003 makes it an offence to:

- Pay for the sexual services of a child
- Cause or incite child prostitution or involve a child in pornography
- Control a child prostitute or a child involved in pornography
- Arrange or facilitate child prostitution or pornography

8.14. Cambian is committed to working with and for children and young people to end this exploitation and recognises this as a child protection concern. As such, any concerns referred regarding this issue should be given the same attention and urgency as any other child protection enquiry under section 47 of the Children Act 1989.

9. Specific Procedures in Practice

9.1. In the case of serious harm, and/or the child or young person is in immediate danger the local **Police should be informed immediately**, so they can take immediate protective action as necessary.

9.2. If you have any concerns in relation to child or young person sexual exploitation they **must be reported immediately** to the line manager. Concern form must be completed and passed on to the DSL/DSL Deputy after the concern is reported verbally as per Child Protection and Safeguarding policy and procedure.

Dealing with allegations of child sexual exploitation in educational establishments

9.3. If information is received from the child/young person directly the person receiving the information will:

- Take action to secure the child/young person's immediate safety (if necessary)
- Attend to any immediate medical needs the child/young person may have
- **Follow 25.00 Child Protection and Safeguarding policy – Flowchart/ Disclosure of allegation of Sexual Abuse part**
- **Inform the DSL/DSL Deputy immediately** (if not available contact on-call Manager, if out of hours)
- Use a Concern Form/Behaviour Watch Concern/SG slip to RECORD the date, time, observations, what was said and who was present. Use body map to record visible injuries. NB. This is recorded by the first person the child/young person spoke to as soon as possible after the event and no longer than 24 hours
- Be available to support the child/young person (if that is his / her wish) during any subsequent investigation

9.4. If the DSL/DSL Deputy has any doubt about whether the information received constitutes a child/Young Person safeguarding concern **he/she must consult with LADO**. The DSL/DSL Deputy will keep a record of this consultation.

9.5. If the Head of Service/Registered Manager is also the DSL then they must consult LADO.

Dealing with allegations of child sexual exploitation in the community

- 9.6.** If information is received either directly or via a third party that a young person has been exploited by a person known to them in the Community the person receiving the information will:
- Take action to secure the child/young person's immediate safety (if necessary)
 - Attend to any immediate medical needs the child/ young person may have
 - **Follow the 25.00 Child Protection and Safeguarding policy – Flowchart/ Disclosure of allegation of Sexual Abuse part**
 - **Inform the DSL/DSL Deputy immediately (if not available contact on-call Manager)**
 - Use a Concern Form/Behaviour Watch Concern/SG slip to record the date, time, observations, what was said and who was present. Use body map to record visible injuries. NB. This is recorded by the first person the child/young person spoke to as soon as possible after the event and no longer than 24 hours
 - Record in detail any direct observations by staff members/foster carers including car registration plates, names of alleged perpetrators, phone numbers, addresses and any indicators suggestive of the possibility of child/young person sexual exploitation on an Information Record Sheet/Daily diary
 - Be available to support the child/young person (in accordance with his/her wishes) during any subsequent investigation
- 9.7.** If DSL/DSL Deputy has any doubt about whether the information received constitutes a safeguarding concern for the child/young person, **he/she must consult with LADO**. The DSL/DSL Deputy will keep a record of this consultation. If the Head of Service/Registered Manager is also the DSL then they must consult LADO.

Dealing with allegations of Peer Exploitation

- 9.8.** Allegations relating to sexual exploitation should be managed in the same manner as the procedures for concerns that arise in a community or educational establishment. More about Peer on Peer abuse can be found in Peer on Peer abuse and Sexual violence and sexual harassment section of this policy and 25.00 Child Protection and Safeguarding policy and Procedure.
- 9.9.** In these circumstances it is important to recognise that both the victim and alleged perpetrator are both children in need. Both sets of respective needs must be taken into account in the course of any subsequent investigation / police enquiry.
- 9.10.** If DSL/DSL Deputy is uncertain whether the information received amounts to an allegation of sexual exploitation then **he/she must consult with LADO** and agree a way forward. The DSL/DSL Deputy must keep a record of the outcome of this consultation.

Dealing with concerns about Professional Abuse (including sexual exploitation concerns)

- 9.11.** All allegations or concerns about abusive or potentially abusive behaviour by professionals will be taken seriously and investigated thoroughly.
- 9.12.** In the event that a member of staff receives an allegation from a child/young person, a third party or observes behaviour which causes them concern directly, they should:

- Take action to secure the young person's immediate safety (if necessary)
- Attend to any immediate medical needs the child/ young person might have
- Report it to the DSL/DSL Deputy immediately. If the conduct of the DSL in itself is the cause for concern staff must follow steps described in sec 6 of 25.00 Child Protection and safeguarding policy and procedure/ Allegations against the DSL (**Principal or Registered Manager or DSL as a substantive role**).
- Record accurately the details of the conduct causing concern including time, date, and circumstances in which information was received at the earliest opportunity and at the latest before the end of your shift.
- Maintain strict confidentiality about concerns

9.13. Upon receipt of this information, the DSL/DSL Deputy will liaise with LADO who will advise how the concerns should be progressed. The DSL/DSL Deputy will also inform the Head of Service (if they are not the DSL) and MD.

9.14. If it is agreed that the matter will be progressed as a Safeguarding concern it will be managed in line with Local Safeguarding Authority's procedure. In this circumstance the DSL/DSL Deputy will inform the Placing Authority, LADO and the relevant Regulator verbally and confirm the information in writing by the end of the next working day.

9.15. If the DSL to whom concerns should be reported is not available then the information should be passed directly to the DSL Deputy who will inform the Head of Service (if they are not the DSL) and MD. Under no circumstances should there be any avoidable delay in progressing concerns about child's / young people's safety and protection.

Additional Considerations

9.16. Parents/carers of a child or children/young people involved should be told about the allegation (unless they are implicated in which case LA/Safeguarding Authority/Police will decide about further actions) as soon as possible if they do not know about it already (the placing authority social worker can decide who will do this). They should be kept informed about the progress of a case, and told the outcomes where there is not a criminal prosecution.

9.17. All the information above need to be read in conjunction with 25.00 Child Protection and Safeguarding policy and procedure.

9.18. If the LADO/Safeguarding Authority confirms that any matter shared/discussed is a safeguarding concern and that it requires investigation either at local or external level then a Safeguarding Tracking pack must be opened with the next sequential Safeguarding Reference included on the form and details as such entered on the central log. The DSL will send a copy of page 1 of the Safeguarding Tracking Pack to the relevant Operations Director/Managing Director

as per Child Protection and Safeguarding policy. Services using Behaviour Watch must use the Concern/SG slip in the system which incorporates Safeguarding Tracking pack within.

9.19. In addition to all regulatory reporting requirements, all **serious incidents** will be escalated and reported to the relevant Care Quality Governance Committee members as outlined in the Serious Incidents escalation procedures.

10. Standard Forms, Relevant Documents, Letters and References

25.00 Child Protection and Safeguarding Policy

021. Anti-Bullying Policy

023. Missing from Care

027. Safeguarding E –Safety

026. Preventing Extremism and Radicalisation

033. Intimate and Invasive Care

035. Serious Incidents

026. Physical Intervention

045. Behaviour support

GHR 30. Whistle-Blowing Policy

GHR 27. Disciplinary Policy

