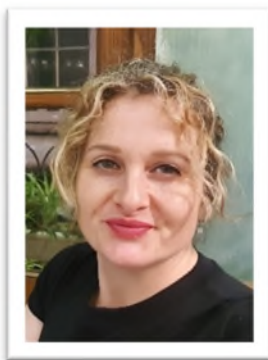


Lufton College

Safeguarding Policy –

(9) Managing Contextual Risks to Children



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Introduction

This policy is written in line with Keeping Children Safe in Education (KCSiE) 2025 and Working Together to Safeguard Children 2023.

Please refer to links below

[Working together to safeguard children 2023: statutory guidance](#)

[Keeping children safe in education 2025](#)

Wider Policies support this Child Protection Policy. All are numbered and sit alongside to create the school safeguarding policy.

1. Child Protection Policy
2. The Role of the DSL Policy
3. Child on Child Abuse Policy
4. Filtering and Monitoring Policy
5. Managing Low Level Concerns Policy
6. Absent from Education Policy
7. Schools Safer Recruitment Policy
8. Safeguarding Over 18s
9. Remote Learning Policy
10. Online Safety Policy
11. Preventing Extremism and Radicalisation Policy

Aims of this policy

The aim of this policy is to ensure staff understand the risks attached to:

- Child Sexual Exploitation
- Child Criminal Exploitation
- Serious violence
- Trafficked Children and Modern Slavery
- Child Abduction
- FGM
- Honour Based Abuse
- Radicalisation and PREVENT
- Family Contexts

Staff are also clear on their role and duty to report any concerns to the DSL. The DSL knows how to share this information with the relevant external agency.

Child Sexual Exploitation

Child sexual exploitation is defined by the [Department for Education \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk) as:

'Child sexual exploitation 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).'

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.'

Child sexual exploitation can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

Who is affected by Child Sexual Exploitation?

Child sexual exploitation 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 may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

- Exploitation can be isolated (one-on-one) or organised group/criminal activity
- There can be a big age gap between victim and perpetrator, but it can also be child on child
- Boys can be targeted just as easily as girls – this is not gender specific
- Perpetrators can be women and not just men
- Exploitation can be between males and females or between the same genders

Children with learning difficulties can be particularly vulnerable to exploitation as can children from particular groups, e.g. looked after children, young carers, children who have a history of physical, sexual emotional abuse or neglect or mental health problems; children who use drugs or alcohol, children who go missing from home or school, children involved in

crime, children with parents/carers who have mental health problems, learning difficulties/other issues, children who associate with other children involved in exploitation.

However, it is important to recognise that any child can be targeted.

Signs a child is at risk of Child Sexual Exploitation

Indicators a child may be at risk of child sexual exploitation include:

- going missing for periods of time or regularly coming home late.
- regularly missing school or education or not taking part in education.
- appearing with unexplained gifts or new possessions.
- associating with other children/students involved in exploitation.
- having older boyfriends or girlfriends.
- suffering from sexually transmitted infections or becomes pregnant.
- mood swings or changes in emotional wellbeing.
- drug and alcohol misuse.
- displaying inappropriate sexualised behaviour.

Child sexual exploitation can happen to a child of any age, gender, ability or social status. Often the victim of child sexual exploitation is not aware that they are being exploited and do not see themselves as a victim.

Child sexual exploitation can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Child Criminal Exploitation (including county lines)

This is written in line with the latest guidance from the Home Office - Criminal exploitation of children and vulnerable adults: county lines. Updated 20 October 2023 [Criminal exploitation of children and vulnerable adults: county lines - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/1000000/criminal-exploitation-of-children-and-vulnerable-adults-county-lines.pdf).

The UK Government defines child criminal exploitation as:

"Child criminal exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology." ([Serious Violence Strategy](#))

Criminal exploitation of children is broader than just county lines and includes, for instance, children forced to work on cannabis farms or to commit theft. However, many of the characteristics of county lines exploitation will be present in other forms of child criminal

exploitation. Likewise, victims of county lines may also experience other overlapping forms of exploitation, such as sexual, in addition to criminal.

Who is Vulnerable to County Lines Exploitation?

Any child, student or vulnerable adult could be a victim of county lines exploitation as exploiters continue to adapt who they target to avoid detection.

- age: 15-17-year olds make up the majority of the vulnerable people involved in county lines but children of primary school age and adults are also known to be targeted (National County Lines Coordination Centre).
- sex/gender: people of all genders can be exploited. Women and girls may be exploited to perform different roles and may experience other forms of harm alongside and so are often under-identified as victims of criminal exploitation – professionals should not make assumptions when working with a girl or young woman about the intervention required.
- ethnicity: people from all ethnicities and nationalities are targeted and the demographics of victims of exploitation vary across England and Wales. In some areas, there is an overrepresentation of people from black and mixed ethnic groups, while in others, victims are mainly white.
- location: county lines are widespread nationally, in rural and urban areas, and while they can involve the movement of drugs across county borders from one area of the UK to another, some lines supply the drugs market locally, within the same town, city or county in which they originate. County lines grooming can take place in a range of settings, including in homes, public spaces, schools and universities, prisons and youth offender institutions as well as online.

Some factors that may heighten a person's vulnerability include:

- having contact with the criminal justice system – even for minor offences that do not appear to be related to county lines;
- having experience of neglect, physical abuse, sexual abuse/exploitation or a lack of a safe/stable home environment, now or in the past (including domestic abuse, parental substance misuse or parental criminal involvement) – trauma, including adverse childhood experiences, can negatively impact on an individual's ability to develop trusted relationships or access support services;
- social isolation or social difficulties – the lack of a support network can mean someone is less able to get help;
- economic vulnerability – offers of material possessions or money for victims or their family may be more readily accepted out of a feeling of necessity and lack of legitimate financial alternatives;
- homelessness or insecure accommodation status – there is a lack of a safe environment to provide security and privacy;

- connections with other people in gangs – some individuals are targeted through family or friends who are already involved in criminal activity themselves and sometimes a drug debt owed by them is passed on to peers or family members;
- having a physical or learning disability, or being neurodivergent – victims may be less able to recognise they are being exploited, or less able to communicate it or access support;
- having mental health issues – exploiters may target poor emotional wellbeing or low self-esteem;
- having substance misuse issues – victims are sometimes given substances in lieu of payment;
- being in or leaving care – the context behind why a person is brought into care can heighten a person's vulnerability in itself, while those in semi-independent/independent accommodation, placed out-of-area or leaving care may have less access to support networks;
- being excluded from mainstream education, and/or a pupil at an alternative provision such as a pupil referral unit – factors influencing a child's exclusion may indicate they are exposed to exploitation, while being disengaged from meaningful activity and peers can evoke feelings of disenfranchisement and, for those with a reduced timetable or not attending school at all, time spent unsupervised can offer opportunities for exploitation; and
- insecure immigration status – for example, unaccompanied asylum-seeking children and refugees may have a number of vulnerability factors that can increase their exposure to exploitation, including social/cultural isolation on arrival to the country and potentially links to organised crime from their journey.

It is important to remember that risk factors such as these are never the cause of a vulnerable person's exploitation into county lines activity; rather, they give rise to the imbalance of power which perpetrators often seek to abuse.

Signs a child is at risk of Child Criminal Exploitation

- Increase in Missing episodes – particular key as children can be missing for days and drug run in other counties.
- Having unexplained amounts of money, new high-cost items and multiple mobile phones
- Increased social media and phone/text use, almost always secretly.
- Older males in particular seen to be hanging around and driving.
- Having injuries that are unexplained and being unwilling to have them looked at
- Increase in aggression, violence and fighting.
- Carrying weapons – knives, baseball bats, hammers, acid
- Travel receipts that are unexplained
- Significant missing from education and disengaging from previous positive peer groups.
- Association with other children/students involved in exploitation.

- Children who misuse drugs and alcohol
- Parent concerns and significant changes in behaviour that affect emotional wellbeing.

Serious Violence

Serious violence is becoming a factor for those who are involved in criminal exploitation. It can also be an indication of gang involvement and criminal activity.

All staff are aware of indicators, which may signal children/students, or members of their families, are at risk from or involved with serious violent crime.

These indications can include but are not limited to

- increased absence from school;
- a change in friendships or relationships with older individuals or groups;
- significant decline in performance;
- signs of self-harm;
- significant change in wellbeing;
- signs of assault; possession of weapons
- unexplained injuries;
- unexplained gifts and/or new possessions;

Staff are aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Advice for staff can be found in the Home Office's [Preventing youth violence and gang involvement](#).

We have a duty to not only prevent the individual from engaging in criminal activity, but also to safeguard others who may be harmed by their actions.

Trafficked Children and modern slavery

The Statutory Guidance from the Home Office - Modern slavery and human trafficking: identifying and reporting perpetrators. (August 2023) [Modern slavery and human trafficking: identifying and reporting perpetrators \(accessible version\) - GOV.UK \(www.gov.uk\)](#). Defines Modern Slavery and Trafficking as:

Slavery

Slavery is described as the status or condition of a person over whom any, or all, of the powers attaching the right of ownership are exercised. In essence, characteristics of ownership and indoctrination need to be present for a state of slavery to exist.

Servitude

Servitude is linked to slavery but is much broader than slavery. In [Siliadin-v-France- 2006-43-EHRR-16](#), the European Court of Human Rights (ECtHR) reaffirmed that servitude is a 'particularly serious form of denial of freedom'. It includes, in addition to the obligation to provide certain services to another, the obligation on the 'serf' to live on the other's property and the perceived impossibility of changing his or her status. Domestic servitude can be characterised as a form of forced labour within a residential setting.

Forced or compulsory labour

[Section 1 of the Forced Labour Convention 1930 \(No.29\)](#) defined forced or compulsory labour as being 'all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily'. Case law suggests that indicators of forced or compulsory labour include recruitment by deception, coercion and/or abuse, exploitation at work, and coercion at destination.

Human trafficking

This is defined in [Article 3](#) of the United Nations Palermo Protocol (applicable to 117 signatories of the Protocol) and in the Council of Europe Convention on Action against Trafficking in Human Beings and, for the purposes of the provisions of the Modern Slavery Act 2015, section 2 of the Modern Slavery Act 2015 (applicable to England and Wales).

Many children are trafficked into the UK from overseas, but children can also be trafficked from one part of the UK to another.

Children are trafficked for:

- [child sexual exploitation](#) • criminal activity, including:
 - cannabis cultivation
 - street crime - such as pickpocketing, begging and bag theft
 - moving drugs
 - benefit fraud
 - immigration fraud
 - selling pirated goods, such as DVDs
 - forced marriage
 - domestic servitude, including:
 - cleaning
 - childcare
 - cooking
 - forced labour, including working in:
 - restaurants
 - nail bars
 - factories

- agriculture
- illegal adoption
- unreported private fostering arrangements (for any exploitative purpose)

This list is not exhaustive and children who are trafficked are often exploited in more than one way. [NSPCC Protecting Children from Trafficking and Modern Slavery - Indicators of Child Trafficking](#)

The DSL immediately refers any suspected victim of modern slavery to the National Referral Mechanism (NRM) and to relevant agencies in line with KCSIE 2025 and the Child Protection/Safeguarding Policy. All staff complete modern slavery awareness training at least annually.

Child abduction

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. Further information is available at: www.actionagainstabduction.org

When we consider who is abducted and who abducts

- Nearly three-quarters of children abducted abroad by a parent are aged between 0 and 6 years-old
- Roughly equal numbers are boys and girls
- Two-thirds of children are from minority ethnic groups.
- 70% of abductors are mothers. The vast majority have primary care or joint primary care for the child abducted.
- Many abductions occur during school holidays when a child is not returned following a visit to the parent's home country (so-called 'wrongful retentions')

If we become aware of an abduction, we will follow the HIPS procedure and contact the police and children's social care (if they are not already aware).

Honour Based Abuse

Female Genital Mutilation (FGM)

The Multi-agency statutory guidance on female genital mutilation 2016 [HM Government - Multi-agency statutory guidance on Female Genital Mutilation \(publishing.service.gov.uk\)](#) describes FGM as:

A procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or

long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

The age at which FGM is carried out varies enormously according to the community. The procedure may be carried out shortly after birth, during childhood or adolescence, just before marriage or during a woman's first pregnancy.

FGM is known by a variety of names, including 'female genital cutting', 'circumcision' or 'initiation'. The term 'female circumcision' is anatomically incorrect and misleading in terms of the harm FGM can cause. The terms 'FGM' or 'cut' are increasingly used at a community level, although they are not always understood by individuals in practising communities, largely because they are English terms.

FGM is illegal in England and Wales under the Female Genital Mutilation Act 2003.

As amended by the Serious Crime Act 2015, the Female Genital Mutilation Act 2003 now includes:

- An offence of failing to protect a girl from the risk of FGM;
- Extra-territorial jurisdiction over offences of FGM committed abroad by UK nationals and those habitually (as well as permanently) resident in the UK
- Lifelong anonymity for victims of FGM;
- FGM Protection Orders which can be used to protect girls at risk; and
- A mandatory reporting duty which requires specified professionals to report known cases of FGM in under 18s to the police.

Forced marriage

Any person may be forced into marriage – this includes people of all ages, genders, ethnicities and religions.

A forced marriage is where one or both people do not or cannot consent to the marriage and pressure or abuse is used to force them into the marriage. It is also when anything is done to make someone marry before they turn 18, even if there is no pressure or abuse.

Forced marriage is illegal in the UK. It is a form of domestic abuse and a serious abuse of human rights.

The pressure put on a person to marry can take different forms:

- physical pressure might take the form of threats or violence (including sexual violence)
- emotional or psychological pressure might take the form of making someone feel they are bringing shame on their family, making them believe that those close to them may become vulnerable to illness if they don't marry, or denying them freedom or money unless they agree to the marriage

But when the person who is to get married is aged under 18, doing anything to make them marry is a crime - it doesn't have to be pressure.

In some cases people may be taken abroad without knowing that they are to be married. When they arrive in that country, their passport(s)/travel documents may be taken to try to stop them from returning to the UK.

Staff are aware of the Forced Marriage Unit (FMU) guidance and legal routes to prevent forced marriage under the Anti-Social Behaviour, Crime and Policing Act 2014. Please refer to guidance link below.

[Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage \(accessible version\) - GOV.UK](#)

Radicalisation and Prevent

The Prevent duty: safeguarding learners vulnerable to radicalisation. Updated September 2023 [The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK \(www.gov.uk\)](#)

All staff must consider the risks and how to identify radicalisation in your education setting - [Understanding and identifying radicalisation risk in your education setting - GOV.UK \(www.gov.uk\)](#)

All DSLs must ensure that they have assessed the risk of radicalisation in their school – [Managing risk of radicalisation in your education setting - GOV.UK \(www.gov.uk\)](#)

Any concerning changes in behaviour may indicate a safeguarding concern. These changes can be emotional, verbal or physical.

A learner may be vulnerable in certain ways that could make them more susceptible to a range of harms. These could include sexual exploitation, extremism and radicalisation, or serious violence.

Staff know about:

- [Prevent awareness elearning](#) from the Home Office
- the government's [Educate Against Hate](#) website
- any internal guidance or resources, such as a staff handbook

Staff in further education (FE) know about Prevent within FE educational and training: [guidance from DfE and the Education and Training Foundation](#)

[online course from the Education and Training Foundation](#) For more information, staff should speak to the DSL.

The Prevent duty

The aim of Prevent is to stop people from becoming terrorists or supporting terrorism. Prevent also extends to supporting the rehabilitation and disengagement of those already involved in terrorism.

The Prevent duty requires specified authorities such as education, health, local authorities, police and criminal justice agencies (prisons and probation) to help prevent the risk of people becoming terrorists or supporting terrorism. It sits alongside long-established safeguarding duties on professionals to protect people from a range of other harms, such as substance abuse, involvement in gangs, and physical and sexual exploitation. The duty helps to ensure that people who are susceptible to radicalisation are supported as they would be under safeguarding processes.

Prevent's objectives

The objectives of Prevent are to:

- tackle the ideological causes of terrorism
- intervene early to support people susceptible to radicalisation
- enable people who have already engaged in terrorism to disengage and rehabilitate

A person's susceptibility to radicalisation may be linked to their vulnerability. [A person can be vulnerable](#) if they need special care, support or protection because of age, disability, risk of abuse or neglect. A person's vulnerabilities may be relevant to their susceptibility to radicalisation and to the early intervention approach that is required to divert them away from radicalisation.

Early intervention: Referral to Prevent

Prevent's second objective is to intervene early to stop people from becoming terrorists or supporting terrorism. This means providing bespoke interventions for people who are susceptible to radicalisation.

Staff inform the DSL who must follow the [notice, check, share procedure](#) should be applied as outlined in the Prevent duty GOV.UK awareness course. Specified authorities should use the Prevent [national referral form](#). Staff also report all concerns to the DSL in line with the Preventing Extremism and Radicalisation Policy and the Child Protection/Safeguarding Policy.

Role of staff

Our school recognises that children and young people may face significant harm beyond their families and the school site. These risks – often referred to as contextual safeguarding risks – require vigilance, professional curiosity and effective multi-agency collaboration.

Who to Contact – Immediate Safeguarding Actions

- If a child is at imminent risk of harm → Call 999 and inform the DSL immediately.
- If you have a safeguarding concern that meets the threshold for statutory intervention → DSL makes a referral to Children's/Adult's Social Care Dept as in line with the Child Protection/Over 18s Safeguarding Policy
- If concerns are emerging but do not meet statutory thresholds → DSL initiates Early Help or targeted intervention with parents/social service's permission where relevant.
- If unsure → Always consult the DSL the same day.

The DSL ensures every student/child with child sexual exploitation indicators has a child sexual exploitation risk assessment, and that details of any related conversations, referrals or multi-agency meetings are recorded.

Children who have been exploited/abused/neglected are provided with additional support to help them thrive in education. All staff offer affected children/students' reassurance and support whilst working in collaboration with external agencies to keep the individual safe.

Parents and carers can feel excluded in work with children and students who are, or who are at risk of being, exploited by perpetrators external to the family. Where assessment shows it is safe and appropriate to do so, parents and families are regarded as a part of the solution. It is crucial to work with them not only to assess the risks of harm faced by the child/student or child but to help them understand what the individual has experienced, the risks they face and how they can be supported and protected. The parents may need direct support and help to improve family relationships and keep their child safe, which may merit referrals being made to social services via the local authority Early Help process.

Risks posed from Immediate and Extended Family

Staff are alert to the fact that many children/students who reside in residential schools and homes have been removed from full-time care of their parents due to issues concerning abuse, neglect, harm and exploitation. Despite this, many will retain contact with their families, often returning for regular contact to environments fraught with conflict, poverty and violence rendering many at risk of continued harm. Staff therefore maintain close observation of any signs of concerns prior to and following periods of family contact whilst proactively communicating any concerns to the DSL.

Training

All staff read Part One of Keeping Children Safe in Education and receive induction and annual refresher training on all contextual risks—including Child Criminal Exploitation, Child Sexual Exploitation, serious violence, Female Genital Mutilation, Prevent (with FE staff completing ETF-delivered training), online safety (the four Cs plus emerging threats such as misinformation/disinformation), child-on-child sexual violence and sexual harassment.

Designated Safeguarding Leads and deputies complete approved DSL training every two years with annual updates, log and refer all concerns, maintain a Child Sexual Exploitation risk register, oversee serious violence incidents through multi-agency action, respond to Female Genital Mutilation disclosures as per the Child Protection/Safeguarding Policy, centrally retain Prevent training records, and ensure at least one member of every recruitment panel holds current safer recruitment training.

Review

A review will be undertaken annually as a minimum. However, subject to a significant safeguarding concern this policy and all other attached policies will be reviewed and monitored as part of a lessons learned review.

This policy was reviewed in August 2025 by Laura Dickie (Head of Policy), Jo Dunn (Director of Compliance, Quality and Regulation - Children), the DSL of the School and agreed by the head of the Governance Board.

Next Review – September 2026