PURPOSE and INTRODUCTION

Adullam Homes Housing Association is committed to the protection of children and young people. The aim of this policy is to set out the values, principles and approach to safeguarding children and young people at risk of CSE and CCE. This policy should support professionals working with young people to identify CSE and CCE and take appropriate action in response.

Policy Statement

Adullam's CCE and CSE Policy and Procedure sets out:

- the steps we take to prevent the risk to young people against CCE and CSE
- the explicit procedures to be followed to safeguard young people against CCE and CSE
- the roles and responsibilities of the adults supporting young people and in the wider organisation of Adullam in relation to a young person who is at risk of CCE and CSE

In accordance with the Working Together to Safeguard Children 2023 statutory guidance, Adullam aims to work collaboratively with the local authority, police and other partners in respect to protocols relating to CCE and CSE.

ROLE AND RESPONSIBILITIES

This Policy applies to:

- All those involved in service delivery on behalf of Adullam Homes Housing Association Ltd and including those currently employed directly by the organisation and those whose services are commissioned on behalf of Adullam Homes Housing Association Ltd.
- All those involved in service receipt and including Young People, Relatives, Social Workers, the Commissioning Local Authority and relevant others.
- All employees, whether they are 'front-line' engaged directly in the task of supporting the young people in our accommodation, or 'ancillary' (e.g. Maintenance Worker, Administrator etc.), are personally responsible for managing their own conduct in relation to following this policy.
- All employees whether they are 'front-line' or 'ancillary' are also responsible for supporting their colleagues and co-workers to follow this policy.
- SLT, line managers and central managers with the registered service manager are responsible for ensuring all those employed directly are made aware of this policy and guidance, and for managing and monitoring its appropriate implementation, and taking necessary action to guard against any breach of this policy.
- The Responsible Individual is responsible for ensuring this policy is reviewed at least annually and more frequently as and when it is considered necessary to do so, and that the policy remains fit-for-purpose. Policy review will take place in consultation with relevant others including where possible and feasible employees and give due regard to any changes in current legislation, regulation and guidance.

Definitions

CSE Child Sexual Exploitation

CCE Child Criminal Exploitation

Young Person Within this Policy we refer to any individual 16-18 years of age as a 'Young Person' as feedback suggests this is the preferred term by those age 16-18.

What is CSE

The Department for Education describes Child Sexual Exploitation as:

"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 or young person 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."

CSE can take place in person, on-line, or a combination of the two. It should be recognised that it can still be abuse, even if the sexual activity appears consensual and this can include both contact and non-contact sexual activity. CSE may involve force and/or enticement-based methods of compliance and could be accompanied by violence or threats of violence.

CSE can be perpetrated by individuals, groups, male or female and children/young people or adults and is generally defined by a form of power imbalance in favour of the perpetrator. Power imbalance could also be due to a range of other factors, such as:

- gender
- sexual identity
- cognitive ability
- physical strength
- status
- access to economic or other resources

Any child or young person can be affected, in any community and affects all ethnic groups. Whilst the risk of CSE could be most frequently observed amongst young females, boys are also equally at risk. There are additional factors that can contribute to a young person's vulnerability to CSE, such as:

- prior experience of neglect or abuse
- lack of a stable home environment
- bereavement/loss
- social isolation or social difficulties
- economic vulnerability
- homelessness or insecure accommodation status
- connections with other young people who are being sexually exploited
- family members or other connections involved in adult sex work
- having a physical/learning disability
- being in care
- confused sexual identity

The signs of CSE:

- a young person may appear frightened of some people, places or situations
- display of unhealthy or inappropriate sexual behaviour
- being secretive
- distinct changes in mood or character
- having access to additional money that they can't or won't explain – for example; returning to the home with expensive clothing, jewellery, technology

- alcohol or drug misuse
- sexually transmitted infections
- self-harm or significant changes in emotional well-being
- multiple callers (unknown adults or peers)
- evidence of/suspicions of physical or sexual assault
- unexplained absences from school/work

It is important to recognise that CSE can occur without any of the above being obviously present. CSE can be particularly challenging to identify in its earlier stages settings if the exploitation is online.

What is classified as CSE

- sexual assault and assault by penetration
- sexual activity with a child
- arranging or commissioning of a child sex offence
- sexual communication with a child
- causing a child to watch a sexual act
- paying for sexual services of a child
- abuse of a position of trust; sexual activity with a child
- trafficking within the UK for sexual exploitation
- administering a substance with the intent to commit a sexual offence
- controlling a child in relation to child sexual exploitation
- meeting a child following sexual grooming

A child is classed as any individual below the age of 18, whilst 16- and 17-year-olds can consent to have sex, it is important to recognise it can still be abuse even if the sexual activity appears to be consensual.

What is CCE?
The Department for Education defines CCE 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."

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."

CCE can take on a variety of forms, but ultimately, it is the grooming and exploitation of young people into a criminal activity. CCE is strongly associated with 'county lines', however, criminal exploitation is a much broader area than this and involves individuals or groups manipulating, deceiving, coercing or controlling someone under the age of 18 to take part in activities that break the law.

Young people may be exploited sexually and criminally at the same time. All form of exploitation is abuse.

Signs of CCE
Some signs of CCE overlap with those of CSE and whilst there are no exhaustive lists of signs to help identify if a young person is at risk of CCE, some behavioural and physical signs to look out for are below:

- reluctance to participate in activities they once enjoyed
- fear of being alone with certain individuals
- withdrawing from family and friends
- difficulty walking/sitting
- signs of restraint such as handcuff marks or rope burns
- unexplained bruises, cuts or injury to the body
- secretive or unusual technology use
- receiving gifts/packages from unknown people
- increased missing episodes/lack of contact
- being collected by unknown vehicles and/or unknown vehicles frequenting in the area

County Lines – What is it?
The Department for Education defines County Lines as:

"County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

While county lines victims are not limited to under 18-year-olds, where a child is exploited, it is often described as child criminal exploitation."

How to promote young people to talk about their safety and well-being

1. Show interest in their lives – Show interest in their day, their lives and what is happening in it. Celebrate their successes with them and offer support when things aren't going so well.
2. Build trust – Be clear and consistent. Be honest. Act with integrity at all times. Maintain professional boundaries whilst still showing the young person you care for them and their well-being.
3. Make talking about safety and feelings normal – Regularly check in on the young person. Be open with the young person without overstepping professional boundaries. Make support sessions fun and meaningful. Praise the young person when they have spoken to you about something that may have been difficult or uncomfortable to share.
4. Be open about your concerns – Speak openly about concerns you have, in an appropriate and non-judgemental way. Let them know you care and why you are concerned about them. Be clear about who you need to share information with and why.

How to respond to concerns relating to CSE/CCE
All children and young people have the right to be protected from harm. It is important that young people feel they can trust those working with them and in their homes to encourage them to speak openly about what is happening in their life. Those working with young people should have a good understanding of the young person, their needs, their daily routines and activities and their individual risk assessments and support plans to be able to identify any changes that may indicate there is a cause for concern.

Young people's support plans and risk assessments should clearly identify any risk relating to CCE/CSE and include the risk level, who is at risk i.e. is the young person a victim or perpetrator, how the risk is managed and mitigated, and how to respond to the risk.

If a young person is a 'high' risk of CCE/CSE they are unlikely to be suitable for a supported accommodation setting as they may require a greater level of care and supervision to ensure they are protected from harm.

Adullam staff should work in partnership with multi-agency teams to develop robust risk assessments in response to CCE/CSE concerns. Staff should challenge appropriately if they do not feel a young person is receiving the correct level of support they require to manage the risk effectively and escalate to their line manager.

Derbyshire Services – Reporting Procedures
Operation Liberty has been created by Derbyshire police to gather intelligence items, crimes and referrals, where there is an aspect of child exploitation. Practitioners can use the Operation Liberty form to provide details, however brief, of any concerns regarding:

- adults who may pose a risk to, or target, groom or exploit children and young people
- a child or young person who is believed to be experiencing grooming and/or exploitation.
- provision of information on places, locations and circumstances where it is believed child exploitation may be taking place

This form is to provide intelligence in relation to exploitation and does not replace the need to report a crime directly to the Police. If the crime has been reported via 101/999, this form does not need completing.

Operation Liberty: https://trixcms.trixonline.co.uk/api/assets/derbyshirescp/e6e01f6c-6220-4fee-bfb4-275a364dadfa/operation-liberty-form-june-2024.pdf

For urgent cases contact **101**
For emergency cases contact **999**

Other organisations working in partnership with Derbyshire around CSE:

- NSPCC - child sexual exploitation
- Safe and Sound Group
- Catch 22
- Children's Society

Greater Manchester Services – Reporting Procedures
The Police Partner Intelligence form (located in Liberty House shared drive) should be completed and submitted to this email address **intel.kdiv@gmp.pnn.police.uk**. This should be completed to share intelligence that is non-urgent relating to exploitation of young people.

Concerns can also be reported to Manchester City Council via 0161 234 5001/ mcsreply@manchester.gov.uk.

For urgent cases contact **101**
For emergency cases contact **999**

Other organisations working in partnership with Greater Manchester around CSE: