

# Child Sexual Exploitation Policy

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## Statement of intent

Epinay School strives to ensure the safety and wellbeing of all students. In order to effectively achieve this, staff members at all schools must safeguard and protect children against child sexual exploitation (CSE). This policy outlines the procedures for preventing, managing and reporting cases of CSE. The responsibilities of staff members in relation to safeguarding and protecting children are outlined, including those in relation to the headteacher, DSL and the local governing committee. In order to effectively implement this policy and ensure the necessary control measures are in place, parents are responsible for working alongside the school to identify concerns and potential risks, in order to ensure the health and safety of their children.

## Legal framework

This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- ❖ DfE (2024) 'Keeping children safe in education 2025
- ❖ Children Act 1989
- ❖ Children Act 2004
- ❖ Safeguarding Vulnerable Groups Act 2006
- ❖ The Education (School Teachers' Appraisal) (England) Regulations 2012
- ❖ Sexual Offences Act 2003
- ❖ The UK General Data Protection Regulation (GDPR)
- ❖ DfE (2023) 'Working Together to Safeguard Children'
- ❖ DfE (2015) 'What to do if you're worried a child is being abused'
- ❖ DfE (2024) 'Information sharing May 2024
- ❖ DfE (2017) 'Child sexual exploitation'
- ❖ UKCIS(2024) "Sharing nudes and semi nudes: advice for education settings working with children and young people

This policy operates in conjunction with the following school policies:

- Child Protection and Safeguarding Policy
- Children Missing Education Policy
- Health and Safety Policy
- General Data Protection Regulations Policy
- Pupil Equality, Equity, Diversity and Inclusion Policy
  - Anti-bullying Policy
- Online Safety Policy
- Staff Code of Conduct

- Behavioural Policy
- Pupil Remote Learning Policy

## Definitions

CSE is defined as a form of child sexual abuse. It may include both physical and non-contact activities and often involves situations where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity:

- In exchange for something the victim needs or wants.
- For the financial advantage or increased status of the perpetrator or facilitator.
- Through violence or threat of violence.

The definition of child sexual exploitation is as follows: 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.

A child can be being sexually exploited even if the sexual activity appears consensual. Additionally, CSE does not always occur in-person; it can also occur through the use of technology.

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.

CSE:

- Can affect anyone under the age of 18, including 16 and 17-year-olds who can legally consent to having sex – some children may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.
- Can take place in person, through the use of technology or a combination of the two. • Can involve physical contact, including assault by penetration, e.g. rape or oral sex, or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing.
- Can involve 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 of grooming a child in preparation for abuse.
- Can involve force and/or enticement, and may involve violence or threats of violence.
- Can occur without the child's immediate knowledge (e.g. through other sharing videos or images of them on social media).
- Can be perpetrated by adult males or females, individuals or groups and in some cases 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.
- Can occur over time or be a one-off occurrence.
- Can be opportunistic or complex and organised.

- Normally involves a power imbalance in favour of the perpetrator. Age is the most obvious imbalance, but it can also be due to other factors such as gender, sexual identity, communication ability, cognitive ability, learning difficulties, physical strength, status and access to economic or other resources.

If sexual gratification, or exercising power and control, is the only motive of the perpetrator, this would not normally constitute CSE, but will be responded to as a different form of child sexual abuse and dealt with in line with the Child Protection and Safeguarding Policy.

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Roles and responsibilities Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play and all school staff will undertake their responsibilities with due diligence to this policy and all safeguarding and child protection policies.

The local governing committee has a duty to:

- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Facilitate a whole school approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the multi-agency safeguarding procedures.
- Guarantee that there are effective child protection policies and procedures in place together with a Staff Code of Conduct.
- Appoint a suitably senior member of staff to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSL(s) to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the local governing committee itself, the SLT and DSL.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Ensure that all staff members receive safeguarding, child protection, and online safety training, updates, such as e-bulletins, emails and staff meetings, as required, but at least annually.

- Guarantee that there are systems in place for pupils to confidently report abuse, safely express their views and give feedback, knowing their concerns will be treated seriously. These systems should be well promoted, easily understood and easily accessible.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.

The headteacher has a duty to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession.
- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members.
- Provide staff, upon induction, with the Child Protection and Safeguarding Policy, Staff Code of Conduct, part one of the 'Keeping children safe in education' (KCSIE) guidance, the Behavioural Policy, the Children Missing from Education Policy, online safety training, and the identity of the DSL and any deputies.
- Use their professional judgement about the need to escort or supervise visitors to the school.

The DSL has a duty to:

- Understand and keep up-to-date with local safeguarding arrangements.
- Act as the main point of contact with safeguarding partners.
- Always be available for staff to discuss safeguarding concerns.
- Make the necessary child protection referrals to appropriate agencies.
- Liaise with the headteacher to inform them of safeguarding issues and ongoing enquiries.
- Liaise with the deputy DSL(s) to ensure effective safeguarding outcomes.
- Act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies.
- Support staff members in liaising with other agencies
- Keep detailed, accurate and secure records of concerns and referrals on CPOMS.
- Secure access to CSE related resources and attend any relevant training courses.
- Ensure that staff members receive safeguarding training, including that in relation to CSE, on a regular basis
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Ensure that child protection files are kept up to date, confidential and are stored securely.
- Ensure that a student's child protection file is copied when transferring to a new school.

Other staff members have a responsibility to:

- Provide a safe environment in which students can learn.
- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Be aware of the signs of abuse and neglect.

- Be aware of the early help process and understand their role in it.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused or neglected.
- [MAKW] support social workers in making decisions about individual children, in collaboration with the DSL.
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child.

### **Staff training**

All staff members will undergo safeguarding and child protection training through Clennells Safeguarding Solutions, including online safety training, at induction, which will be regularly updated as required, but at least annually or whenever there is a change in legislation. Where appropriate, information will be provided to parents in order to help combat CSE at all levels within the school community. When planning training, the DSL and headteacher will take the context of the school into consideration, ascertaining whether there are specific issues which need to be addressed as a priority.

During staff training, the following issues will be addressed:

- Warning signs and indicators of CSE
- The different forms of CSE
- Pupils most at risk of CSE
- Protecting and supporting pupils
- Procedures for reporting suspected cases of CSE
- Information sharing protocols
- Online safety

Staff training will be updated on a regular basis, at the discretion of the DSL and headteacher, ensuring that the information staff members have is up-to-date with sector developments.

The DSL and deputy DSL will undergo updated child protection training, including online safety training, every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up-to-date with any developments relevant to their role.

All staff members will be trained through Clennells Safeguarding Solutions to respond to concerns in ways that are:

- Child-centred.
- Developed and informed by the involvement of the child's family, where appropriate.
- Responsive and pro-active.
- Relationship-based.
- Informed by an understanding of the complexities of CSE.

## **Indicators of CSE**

Staff members will be aware of the students most at risk of being sexually exploited, including vulnerable pupils, excluded pupils and pupils with SEND.

All staff members are aware of the warning signs of CSE and will use their professional judgement in recognising certain indicators.

Staff members will be aware that indicators of CSE may include, but are not limited to, situations where pupils:

- Appear with unexplained gifts, money or new possessions.
- Associate with others involved in exploitation.
- Suffer from changes in emotional wellbeing.
- Misuse alcohol and other substances.
- Go missing for periods of time or regularly come home late.
- Regularly miss school or do not participate in education.
- Have older boyfriends or girlfriends.
- Suffer from sexually transmitted infections.
- Display sexual behaviours beyond expected sexual development.
- Become pregnant.

## **Effects of CSE**

CSE can have long-lasting effects on a child and the school is committed to early identification in order to reduce these effects. All staff members will be made aware of the effects and signs of CSE in order to aid early identification. Staff members are aware that CSE can affect every aspect of a child's life, including, but not limited to, the following:

- Physical wellbeing
- Mental health
- Education
- Employment prospects
- Family relationships
- Social relationships, as children and as adults
- Their relationship with their own children in the future

Consensual and non-consensual sharing of nude and semi-nude images and/or videos.

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams by children under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The term 'nudes' is used as it is most commonly recognised by children and more appropriately covers all types of image sharing incidents.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by children who are

in relationships, as well as between those who are not in a relationship. It is also possible for a child in a consensual relationship to be coerced into sharing an image with their partner.

Incidents may also occur where:

- Children find nudes and semi-nudes online and share them claiming to be from another child
- Children digitally manipulate an image of a child into an existing nude online
- Images created or shared are used to abuse other children e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts. Nude or semi-nude images, videos or live streams may include more than one child. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children complex. There are also a range of risks which need careful management from those working in education settings.

Many professionals may refer to 'nudes and semi-nudes' as:

- Youth produced sexual imagery or 'youth involved' sexual imagery indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children under the age of 18.
- 'Sexting'. Many adults may use this term, however some children interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images.
- Image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and seminudes.

Initial response

When an incident involving nudes and semi-nudes comes to the attention of any member of staff:

- Confiscate the phone and switch it to flight mode if possible.
- The incident should be referred to the DSL (or deputy) as soon as possible.
- The DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding team who deal with safeguarding concerns.
- There will be subsequent interviews by the DSL and MAKW with the children involved (if appropriate).
- Parents and carers will be informed at an early stage and involved in the process in order to best support the child unless there is good reason to believe that involving them would put the child at risk of harm.
  - A referral will be made to children's social care and/or the police immediately if there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process. A disclosure may not be a single event and the child may share further information at a later stage.

Any direct disclosure by a child should be taken seriously. A child who discloses they are the subject of an incident of sharing nudes and semi-nudes is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

Initial review meeting The initial review meeting will consider the initial evidence and aim to establish:

- Whether there is an immediate risk to any child
- If a referral should be made to the police and/or children's social care

- If it is necessary to view the image(s) in order to safeguard the child – in most cases, images or videos should not be viewed
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms as this may be unknown
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the children involved which would influence risk assessment
- If there is a need to contact another education, setting or individual
- Whether to contact parents or carers of the children involved - in most cases they should be involved

An immediate referral to police and/or children's social care through the MASH (multi-agency safeguarding hub) or equivalent will be made if at this initial stage:

- The incident involves an adult.
- There is reason to believe that a child has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The images involve sexual acts and any child in the images or videos is under 13.
- You have reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

The DSL should be aware of the requirement for children to have an appropriate adult while a child is being questioned by the police. The appropriate adult will "support, advise and assist" the child, and also "observe whether police are acting properly and fairly to respect [the child's] rights and entitlements, and inform the officer of the rank of inspector or above if they consider that they are not". Further information can be found in the statutory guidance – PACE Code C.2023

If none of the above apply, the DSL may decide to respond to the incident without involving the police or children's social care. They can still choose to escalate the incident at any time if further information/concerns are disclosed at a later date.

The decision to respond to the incident without involving the police or children's social care will only be made in cases where the DSL is confident that they have enough information to assess the risks to any child involved and the risks can be managed within the school's support and disciplinary framework and, if appropriate, their local network of support.

### **Online safety**

The school will ensure that online safety is a running and interrelated theme whilst devising and implementing policies and procedures.

Online safety is embedded throughout the curriculum, with teaching always made appropriate to students' ages and developmental stages; however, it is particularly addressed in the following subjects:

- PSHE and RSE
- ICT

The school recognises that a one size fits all approach to teaching safeguarding, including online safety, may not be appropriate for all students. A more personalised or contextualised approach for more vulnerable students, victims of abuse may be needed. Students are taught the underpinning knowledge and behaviours that can help them to navigate the online world safely and confidently regardless of the device, platform or app they are using.

The underpinning knowledge and behaviours students learn through the curriculum include the following:

- How to evaluate what they see online
- How to recognise techniques used for persuasion
- Acceptable and unacceptable online behaviour
- How to identify online risks
- How and when to seek support

Through training, all staff members will be made aware of the following:

- Students attitudes and behaviours which may indicate they are at risk of potential harm online
- The procedure to follow when they have a concern regarding a student's online activity

Further information regarding the school's approach to online safety can be found in the E Safety Policy. Where students need to learn online from home, the school will support them to do so safely in line with the Remote Learning Policy and government guidance.

### **Relationships and sex education**

Students will be taught about CSE in line with the school's Relationships and Sex Education Policy. CSE will be addressed as part of a wider programme of work regarding relationships and sex education (RSE), as well as part of PSHE.

The school is dedicated to delivering these programmes of work with sensitivity and respect, avoiding any derogatory or prejudicial terms which may cause offence.

The school understands that the teaching of some aspects of the programmes may be of concern to parents; therefore, parents will be involved in the curriculum planning process, ensuring that what is taught and how it is taught does not cause distress to parents or students.

Students will be made aware of the dangers of CSE, along with how to spot the signs and symptoms of CSE, through assemblies, leaflets, posters and the curriculum.

The DSL will work in conjunction with the PSHE lead to ensure that age-appropriate lessons are devised. Teachers will consider the feelings of pupils who may have been traumatised by similar incidents in their past when teaching about CSE. Sensitivity will be given to the age and cultural background of students. Where possible, CSE education will build on existing topics that pupils may already be aware of. Only age-appropriate topics will be taught. Throughout every year group, age-appropriate resources, such as diagrams, videos, books, games, discussion and practical activities, will be used to assist learning.

## **Working with parents**

The school will ensure that parents:

- Understand the risks of CSE and recognise that the issue is something that could affect their child.
- Understand that CSE can occur both online and offline.
- Know the warning signs of CSE.
- Know how to report any concerns that they may have.
- Know where to go for support if their child has been the victim, or is the suspected victim, of CSE.
- Are reassured that a range of services will, as appropriate, work with them to try to protect their child.
- Can access support to manage the emotional impact of CSE on their child and themselves. • Can access support that is tailored to their specific circumstances, e.g. support that recognises culture or faith.

Parents will be provided with the contact information of relevant services and outside agencies via letters, texts or emails home and the school website. Parents will be made aware of whom to report concerns to within the school, via information posted on the school website.

Parents' concerns will always be listened to and taken seriously. Parents will be consulted regarding the content of pupils' RSE, including that in relation to CSE, and their views will be listened to and valued.

The school respects the legal right of parents to withdraw their child from all or part of the RSE programme, including that regarding CSE, except for the statutory parts included in the science national curriculum.

## **Risk assessment and consent**

In assessing whether a child or young person is a victim of sexual exploitation, or at risk of becoming a victim, careful consideration should be given to the issue of consent. It is important to bear in mind that:

- A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other sexual type of sexual touching.
- Sexual activity with a child under 16 is also an offence.
- It is an offence for a person to have a sexual relationship with a 16 or 17 year old if they hold a position of trust or authority in relation to them.
- Where sexual activity with a 16 or 17 year old does not result in an offence being committed it may still result in harm or the likelihood of harm being suffered.
- Non consensual sex is rape whatever the age of the victim.
- If the victim is incapacitated through drink or drugs or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed.

## **Reporting and referrals**

If a member of staff has any concern about a child's welfare, or suspects that a student is at risk of, or has been the victim of CSE, they will act on them immediately by speaking to the DSL or a deputy.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the Child Protection and Safeguarding Policy.

The DSL will provide staff members with clarity and support where needed. Where staff have safeguarding concerns or an allegation is made about another member of staff, this should be reported to the headteacher. If there is a conflict of interest in reporting the matter to the headteacher, it should be reported directly to the LA designated officers (LADOs). In all cases, the reporting and referral process outlined in the Child Protection and Safeguarding Policy will be followed accordingly.

If a student is in immediate danger, a referral will be made to and/or the police immediately. When making a referral to MARF and /or MSET or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

**Advice and support:**

**South Tyneside Safeguarding Children Board**

[www.stscg.org.uk](http://www.stscg.org.uk)

Referral and assessment unit 0191 4564473

**UK Human Trafficking Centre**

Email [UKHTC@nca.x.gsi.gov.uk](mailto:UKHTC@nca.x.gsi.gov.uk)

Tel 0844 778 2406

**REACH (Rape, Examination, Advice & Counselling)**

Tel 0191 212 1551

**NSPCC**

Definitions, statistics, facts and resources about CSE

**Barnardos**

Spot the signs – advice for parents, professionals and young people on the signs of sexual exploitation and how to keep safe.

**Useful Contacts and Links**

**For students**

**CEOP** - This national crime agency website can be used to make a report when a child is worried about online sexual abuse or the way someone has been communicating with them online. For more information, visit: <https://ceop.police.uk/safety-centre/>.

#### **For parents**

**Parents Protect** - A child sexual abuse awareness and prevention website created by the child protection charity Lucy Faithfull Foundation and Stop it Now! Campaign. This site provides information on CSE and where to get help, as well as a list of useful contacts. For more information, call 0808 1000 900 or visit:

<https://www.parentsprotect.co.uk/home.htm>.

**Safe and Sound Group** - This organisation fighting CSE has created a parent support resource pack providing various sources of useful information regarding supporting a child who is a victim of CSE. For more information, call 01332 362 120 or visit:

<http://safeandsoundgroup.org.uk/help-support/parentscarers/parent-support-pack/>.

#### **For teachers - It's Not Okay**

A CSE related website reinforcing the duty of school staff and the role that schools play in the protection of children and prevention of CSE. For more information, visit: <http://www.itsnotokay.co.uk>.

#### **Childnet**

This online safety website has an area specifically designed for teachers, providing numerous resources to use within the classroom in order to teach children how to use the internet safely. For more information, visit:

<https://www.childnet.com/teachers-and-professionals>

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