



CRIMINAL EXPLOITATION (CE) POLICY

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Status	Non-Statutory
Responsible Management Committee (MC)	Curriculum & Wellbeing
Date last approved by MC	March 2022
Responsible Person	Headteacher
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Criminal Exploitation (including County Lines) comes under the remit of Child Protection and Safeguarding.

This policy has a clear overlap, and should be read in conjunction with, our Child Protection & Safeguarding policy. This policy will define Criminal Exploitation (CE) and County Lines, and will have the appropriate procedures attached. HPRS recognises that our pupils are at risk of CE and need to ensure that all staff know what to look out for and how to respond to concerns.

Child Protection Statement

The Herefordshire Pupil Referral Service (HPRS) recognises our statutory responsibility to safeguard and promote the welfare of all children. All children regardless of age, gender, ability, culture, race, language, religion or sexual identity have equal rights to protection. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. **Safeguarding is everyone's responsibility.**

Aims

- To provide a safe, healthy learning environment that allows all children to develop to their full potential.
- To ensure children know they can report concerns affecting their welfare and safety and know that their concerns are listened to seriously.
- To ensure our children know who the adults are in school that they can approach if they are worried or in difficulty or concerned about one of their peers.
- To ensure we equip children with the skills to keep themselves safe.
- To identify concerns about a child's welfare, and to initiate or take appropriate action to keep them safe.
- To promote partnership working with parents/carers and other agencies involved in dealing with cases of CE.
- To ensure safe recruiting practices are followed to check the suitability of staff and volunteers who work with our students.
- To provide all staff and volunteers with the necessary information to enable them to meet their child protection responsibilities with respect to CE.
- To provide ongoing training to ensure all staff know that they have an equal responsibility to act on any suspicion or disclosure that may suggest a child is of CE.

- To develop and implement procedures for identifying and reporting cases, or suspected cases, of CE and for staff to be aware of HPRS CE and safeguarding procedures.
- To ensure all staff are equipped to deal with CE and safeguarding concerns and attend regular safeguarding training.
- To ensure that fundamental British values are promoted and extremist views are challenged and children are kept safe from the risk of CE.

We recognise that it is the responsibility of each of us to ensure that all elements of this policy are actively and consistently reflected in our practice. We will monitor, evaluate and review the impact of this policy annually.

Criminal Exploitation

CE often occurs without the victim being aware that they are being exploited and involves young people being encouraged, cajoled or threatened to carry out crime for the benefit of others. In return they are offered friendship or peer acceptance, but also cigarettes, drugs (especially cannabis), alcohol or even food and accommodation.

Young children can be groomed to enter gangs and commit crime on behalf of older criminals. These young people can be exploited and, persuaded or lured into carrying out illegal activities, often with the promise of something they desire as a reward, they become incredibly vulnerable.

Victims of CE are often fearful of getting into trouble themselves – for the very actions they have been exploited into carrying out – so it can be difficult to get these young people to come forward and speak out about their situation.

County Lines

County lines is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or ‘deal lines’. They exploit children and vulnerable adults to move the drugs and money to and from the urban area. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion.

County lines is a major issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

Staff at HPRS look out for signs

A young person's involvement in county lines activity often leaves signs. A young person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a young person's lifestyle should be discussed with them. Some indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

Equality statement

Our pupils have an increased risk of abuse or exploitation and additional barriers can exist for them to recognise or disclose it. We are committed to anti-discriminatory practice and recognise our pupils' diverse circumstances. We ensure that all our pupils have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of criminal exploitation, FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

Roles and Responsibilities

We recognise that child protection in relation to CE is the responsibility of all staff working within the HPRS. Our role is summarised as;

- Protecting pupils from maltreatment, physical, emotional and sexual abuse or exploitation.
- Preventing impairment of pupil's health or development.
- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care.

- Taking action to enable all pupils to have the best outcomes.
- Educating pupils to make positive choices.
- To ensure any pupil seeking help with feel safe and supported

We recognise that because of the day to day contact with pupils, HPRS staff are well placed to observe the outward signs of exploitation. We, therefore, work hard to:

- Establish and maintain an environment in which pupils and parents feel secure, are encouraged to talk, and are listened to.
- Ensure that pupils know there are adults whom they can approach if they are worried.
- Include opportunities in the curriculum for pupils to develop the skills they need to recognise and stay safe from abuse, bullying, discrimination or exploitation.
- Ensure that all staff are aware of the need to maintain appropriate and professional boundaries in their relationships with pupils and parents.

Within the HPRS there are designated members of staff with responsibility for child protection and safeguarding as follows:

DSL	James Bowdler Nick James-Williams Jenny Gaze
DDSL	Rebecca Brand
Management Committee	Jonathan Nicholas
LAC and previously LAC Lead	James Bowdler
Prevent Lead	James Bowdler

The responsibilities of the DSL, DDSL and The Management Committee are set out in the CE, Child Protection and Safeguarding procedures, below.

CRIMINAL EXPLOITATION AND COUNTY LINES PROCEDURES

All staff should report any CE or county lines concerns to the DSL as soon as possible AND log their concern on MyConcern so there is a record in writing with a date stamp. If the DSL and DDSL are not available, the MyConcern entry should be made immediately so that they receive a digital notification.

Any verbal conversations should be recorded in writing immediately.

- Concerns about any staff member should be reported to the Headteacher.
- Concerns about the Headteacher should be reported to the Chair of Governors.
- Concerns will be sent to the Local Authority Designated Officer (LADO)

Responsibilities of the Designated Safeguarding Lead (DSL):

- Refer cases of suspected exploitation, abuse or allegations to Social Care; police or other relevant agency.
- Create a risk assessment for the pupil to support their safeguarding.
- Report all instances to the Wellbeing Sub-Committee.
- Keep a record that is shared with the Local Authority.
- Monitor attendance and ensure a pupils wellbeing is investigated if they are persistently absent.
- Acts as a source of support, advice and expertise for staff within the HPRS.
- Ensures all staff have access to and understand the HPRS CE and child protection and safeguarding policies.
- Updates the HPRS CE and child protection and safeguarding policies annually.
- Is the designated person for Looked After Children and previously looked after children. As part of this role they will attend training and will work closely with the Virtual Headteacher and the child's Social worker to ensure the child is kept safe.

Responsibilities of the Deputy Designated Safeguarding Lead (DDSL):

- In the absence of the DDSL, carries out those functions necessary to ensure the ongoing safety and protection of children.
- In the event of the long term absence of the DSL, the deputy will assume all of the functions above.

Management Committee responsibilities

The HPRS Management Committee will ensure that:

- There are regularly updated CE and county lines policies and the appropriate procedures in place.
- Safe recruitment procedures are in place and that all appropriate checks are carried out including statutory checks on the suitability of staff to work with children and disqualification by associated regulation.
- All staff undertake appropriate training.
- There is a member of the Committee who will take lead responsibility for the organisation's CE, child protection and safeguarding arrangements.

- There are procedures for dealing with allegations of abuse made against a member of staff or volunteer.

Staff responsibilities:

Child Protection and safeguarding is the responsibility of all staff. It is the responsibility of every member of staff to refer any concerns about a child's safety and welfare to the DDSL or the DSL. Recognising CE is not easy, and it is not staff's responsibility to decide whether or not CE has taken place or if a child is at significant risk. Staff are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned. All staff have a responsibility to act in the interests of the child if they have a concern about a child's welfare or safety.

Safeguarding training will be delivered annually for all staff and will cover CCE. If you do not attend the face to face training you **MUST** complete online training and log proof of training with the SCR.

The relationships and associations that staff have in school and outside (including online), may have an implication for the safeguarding of pupils in the school. Where this is the case, staff **MUST speak to the DSL or Headteacher.**

CRIMINAL EXPLOITATION AND COUNTY LINES PROCEDURES

Increased risk of CE during lockdown / COVID-related absence

The "invisibility of vulnerable children" during the pandemic should be a "matter of national concern," says England's chief inspector of schools. Amanda Spielman warns when many pupils were out of school in the lockdown, teachers might not have picked up early warning signs of abuse or neglect.

Given the significant risk of an increase in ACE's for many vulnerable children during lockdown, staff should be aware that this can increase the risk of CE. They should also be aware that spotting the signs of CE may also prove more difficult at this time. In order to attempt to reduce this risk the school will be:

- Encouraging all pupils to continue to attend school during this time. This is our priority, providing a safe place where pupils can continue to learn but can also be monitored by staff during the day.
- Listening and making a record of any concerning conversations that may indicate pupil vulnerability and reporting these immediately to DSL.
- Contacting at least twice a week any pupil that is not attending school.
- Carrying out safe and well checks if no contact has been made within a week.