



## CHILD CRIMINAL EXPLOITATION (CCE) POLICY

Version: February 2025

Status	Non-Statutory
Responsible Management Committee (MC)	Curriculum & Wellbeing
Date last approved by MC	05 February 2025
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 Child Criminal Exploitation (CCE) and County Lines, and will have the appropriate procedures included. HPRS recognises that our pupils are at risk of CCE 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 CCE.
- 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 CCE.
- 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 CCE.
- To develop and implement procedures for identifying and reporting cases, or suspected cases, of CCE and for staff to be aware of HPRS CCE and safeguarding procedures.

- To ensure all staff are equipped to deal with CCE 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 CCE.

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.

## Child Criminal Exploitation

Child criminal exploitation (CCE) is a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child criminal exploitation (CCE) and child sexual exploitation (CSE) We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Children can be exploited by adult males or females, as individuals or groups. 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. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and

- regularly miss school or education or do not take part in education. Children who have been exploited will need additional support to help keep them in education. Child Sexual Exploitation (CSE) 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. Some additional specific indicators that may be present in CSE are children who:
- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant. Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: guide for practitioners

## County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines.

Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home
- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals

## Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions

- 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 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
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

## Roles and Responsibilities

We recognise that child protection in relation to CCE 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:

<b>DSL</b>	Beverley Blower	(HPRS & St. David’s)
	Nick James-Williams	(Aconbury)
	Jonathan Sheers	(H3)
	Jenny Rooney	(H3)
<b>DDSL</b>	Stacey Musto	(St. David’s)
	Shelley Davies	(Aconbury)
	Sarah Mobbs	(Aconbury)
	Kate Robertston	(H3)

**Management Committee**     Jan Baker

**CLA / Previously CLA Lead**     April Howard

**Prevent Lead**     Beverley Blower

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

# CHILD CRIMINAL EXPLOITATION AND COUNTY LINES PROCEDURES

All staff should report any CCE 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 pupil's 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 CCE and child protection and safeguarding policies.
- Updates the HPRS CCE and child protection and safeguarding policies annually.

## 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.

## SENDCo Responsibilities

- 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.

## Management Committee responsibilities

The HPRS Management Committee will ensure that:

- There are regularly updated CCE and county lines policies and the appropriate procedures in place.
- Safer 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 CCE, 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 CCE is not easy, and it is not staff's responsibility to decide whether or not CCE 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.

**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 Headteacher.**

## **Exploitation Tools and Pathway Resources:**

[Exploitation Tools and Pathways - Herefordshire Safeguarding Boards and Partnerships](#)