



Child Sexual Exploitation Policy

Updated by: T Rowley-Field	Approved by: M Lees	Date: Jan 2026
Review Internal: Annual	Next Review Date: Jan 2027	Version: 2.0

Contents

- Statement of intent
- 1. Legal framework
- 2. Definitions
- 3. Roles and responsibilities
- 4. Staff training
- 5. Indicators of CSE
- 6. Effects of CSE
- 7. Consensual and non-consensual sharing of indecent images and videos
- 8. Reporting and referrals
- 9. Providing support
- 10. Monitoring and review
- 11. Useful Contacts and Links

Statement of intent

The Shrubbery School strives to ensure the safety and wellbeing of all pupils at the school. To effectively achieve this, staff members at the school must safeguard and protect children against child sexual exploitation (CSE).

This policy outlines the school's 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 Proprietary Board.

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, to ensure the health and safety of their children.

1. Legal framework

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

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- The UK General Data Protection Regulation (UK GDPR)
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- DfE (2023) 'Working Together to Safeguard Children'
- DfE (2025) 'Keeping children safe in education 2025'
- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'

This policy has been reviewed to reflect the requirements of *Keeping children safe in education* from September 2025.

This policy operates in conjunction with the following school policies:

- Child Protection and Safeguarding Policy
- Behaviour Policy
- Data Protection Policy
- Anti-bullying Policy
- Suspension and Exclusion Policy
- Online Safety Policy
- Staff Code of Conduct
- Children Missing from Education Policy
- Low-level Safeguarding Concerns Policy

2. Definitions

CSE is defined as a form of child sexual abuse 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.

A child can be being sexually exploited even if the sexual activity appears consensual.

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.

All staff will recognise that CSE:

- Can affect anyone under the age of 18.
- Can take place in person, using 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 or grooming a child in preparation for abuse (including via the internet).
- Can involve force and/or enforcement 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**.

The term *harm threshold* is used throughout this policy to describe the point at which concerns require referral to statutory safeguarding agencies, in line with *Keeping children safe in education*.

3. Roles and responsibilities

The Proprietor/Proprietary Body has a duty to:

- Ensure that the school complies with its safeguarding and child protection duties.
- Guarantee that the policies, procedures and training opportunities in the school relating to CSE are effective and compliant.
- Receive assurance regarding the effectiveness of procedures for preventing and responding to child sexual exploitation and providing appropriate challenge where required.

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 Proprietary Body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members.

- Ensure staff have a sufficient awareness of the signs and indicators of CSE, and how to manage potential cases.

The DSL has a duty to:

- 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.

Other staff members have a responsibility to:

- Follow the procedures outlined in this policy and the school's other policies relating to safeguarding and child protection.
- Understand and recognise the signs of CSE.
- Read Annex B of KCSIE if they work directly with pupils, which contains additional information on CSE.

4. Staff training

All staff members will undergo training in line with the **Child Protection and Safeguarding Policy**. Where appropriate, training sessions 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 relating to CSE 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
- Facilitating conversations with pupils and parents about CSE

All staff members will be trained 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.

5. Indicators of CSE

Staff members will be aware of the pupils 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 look out for the following indicators:

- Being secretive
- Acting withdrawn and isolated
- Unexplained gifts, money or new possessions
- Unexplained and/or regular school absences
- Acting hostile or aggressive

- Displaying inappropriate sexualised behaviour beyond expected sexual development
- Developing relationships, particularly of a sexual nature, with a significantly older person
- Changing their physical appearance
- Changes in emotional wellbeing
- Lack of participation in education
- Becoming involved in petty crime
- Self-harming or displaying significant changes in emotional wellbeing
- Having physical injuries without plausible explanation
- Suffering from sexually transmitted infections
- Trying to conceal marks or scars on their body
- Having a lack of positive relationships
- Using the internet and social media in a manner which causes concern

6. 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
- Family relationships
- Social relationships, as children and as adults
- Their relationship with their own children in the future

7. Consensual and non-consensual sharing of indecent images and videos

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern.

The consensual and non-consensual sharing of indecent images and videos of those under the age of 18 with or by adults is a form of child sexual abuse and must be referred to the police.

8. Reporting and referrals

If a member of staff has any concern about a child's welfare, or suspects that a pupil 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.

Where concerns relate to staff behaviour or early boundary issues that do not meet the harm threshold, these will be managed in accordance with the **Low-Level Safeguarding Concerns Policy**.

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 concerns about CSE 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).

Where concerns relate to systemic safeguarding practice, organisational culture or leadership decisions, staff may raise concerns under the **Whistleblowing Policy**.

In all cases, the reporting and referral process outlined in the **Child Protection and Safeguarding Policy** will be followed.

If a pupil is in immediate danger, a referral will be made to CSCS and/or the police immediately.

When making a referral to CSCS 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.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS.

Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm.

Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

All safeguarding and child protection concerns, including those in relation to CSE, will be dealt with in line with the procedures outlined in school policies, most notably the **Child Protection and Safeguarding Policy**.

9. Providing support

Staff members will undergo safeguarding training on an annual basis so that they can fully understand the needs of a pupil that has experienced CSE and provide effective support.

Staff members will build trusting relationships with pupils which reinforce positive relationships.

Pupils will be reassured that they can talk to staff members if they feel unsafe. All pupils will be able to identify at least three adults in the school who they feel like they could approach to talk to if they have a concern. A listening culture within the school will be actively promoted by all staff members.

10. Monitoring and review

This policy is reviewed annually by the DSL, the Headteacher and the Proprietary Body.

Records relating to child sexual exploitation, including referrals, risk assessments and decisions made, will be maintained securely and made available promptly for internal review or inspection.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

This policy has been reviewed as part of the school's integrated safeguarding framework to ensure consistency across all safeguarding-related policies.

11. Useful Contacts and Links

For pupils

Think U Know

This website includes different sections designed for children and young people aged 5-7, 8-10, 11-13 and 14+, ensuring that children and young people are taught about CSE using the appropriate resources and terminology for their age. For more information, visit: www.thinkuknow.co.uk.

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: www.ceop.police.uk/safety-centre.

CSE the Signs

Within this website there is a specific section designed for teaching children about CSE, including in relation to spotting warning signs, developing healthy relationships, staying safe, getting help and busting CSE myths. For more information, visit: www.cssethesigns.scot/young-people.

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 www.parentsprotect.co.uk

CSE the Signs

Within this website there is a specific section designed for parents regarding recognising the signs of CSE, keeping your child safe online and how to access help and support for your child. For more information, visit: www.cssethesigns.scot/parents.

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: www.safeandsoundgroup.org.uk/help-support/parentcarers/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: 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: www.childnet.com/teachers-and-professionals.