



Safeguarding Children Abused through Exploitation

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Summary of Purpose	This guidance is a means of supporting professionals and the community of Kent and Medway to identify and respond appropriately to safeguard children who are being exploited or at risk of exploitation.
Accessibility	This document can be made available in large print, or in electronic format. There are no copies currently available in other languages.
Equalities Impact Assessment	During the preparation of this policy and when considering the roles and responsibilities of all agencies, organisations and staff involved, care has been taken to promote fairness, equality, and diversity, in the services delivered regardless of disability, ethnic origin, race, gender, age, religious beliefs or sexual orientation.
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1. Introduction

1.1 Definitions

1.1.1 Child Exploitation

Child exploitation is when someone uses a child for financial gain, sexual gratification, labour or personal advantage. Exploitation of children can take several different forms and perpetrators may subject children to multiple forms of abuse at the same time, such as criminal exploitation (including county lines) and sexual exploitation.

1.1.2 Child Criminal Exploitation

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology¹.

1.1.3 Child Sexual Exploitation

Child Sexual Exploitation (CSE) is a form of Child Sexual Abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited, even if the activity appears consensual. CSE does not always involve physical contact, it can occur through the use of technology².

1.1.4 Online Abuse

Online abuse is any type of abuse that happens online, including exploitation. It can happen via any device that is connect to the internet and in any online space.

Child exploitation can occur through the use of technology. Organised criminal gangs as well as individuals have pivoted towards online methods to groom, recruit and exploit children. Online platforms are increasingly being used to engage children, and to keep them trapped in a cycle of exploitation and/or criminal behaviour. This abuse can take place on social media, gaming, live-streaming, and other messaging platforms, apps or website.

¹ <https://www.gov.uk/government/publications/serious-violence-strategy>

² <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

Exploitation that begins online may transition offline³ and offline exploitation can include online abuse.

1.1.5 Contextual Safeguarding: Risks Outside the Home

Contextual safeguarding or risks outside the home is a term which may be applied where children and are vulnerable to exploitation from outside their families; these extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online.

1.1.6 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 forms 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 and 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.

1.2 Models of exploitation

Exploitation can occur in many ways, with exploiters and groomers employing a range of tactics to facilitate their exploitation of children. It may be helpful for practitioners to be familiar with some of the common models of exploitation, being mindful that exploitative and grooming behaviours may not always be inherently obvious.

Relationship model

Involving the befriending and grooming of a child by an older adult. Often revolving around the child’s vulnerability and building them to believe they are in a loving relationship. They may have genuine feelings for the perpetrator and may protect them from discovery. The child may then be passed to other adults known to the ‘boyfriend’ or ‘girlfriend’ merging into the gang or organised networks model.

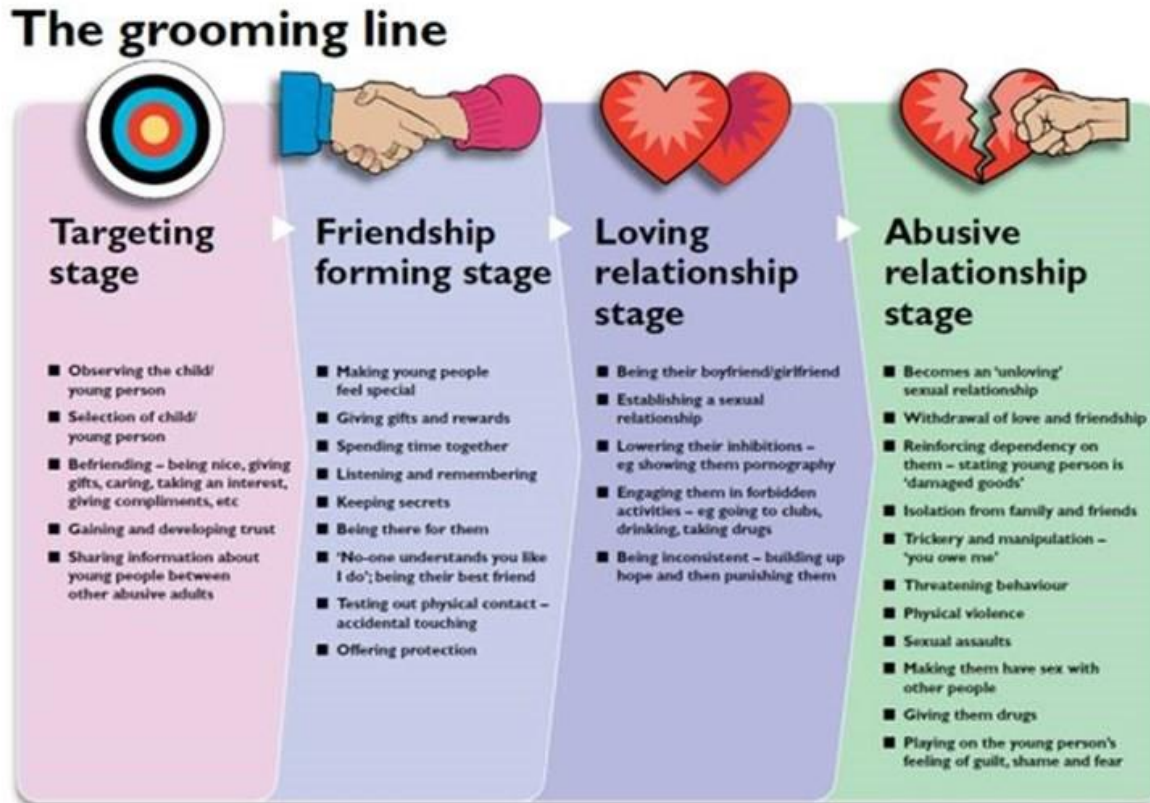
Child-on-child exploitation

Any form of physical, sexual, emotional or financial, and/or coercive control exercised between children and, including intimate and non-intimate relationships. Some children or

³ <http://www.preventknifecrime.co.uk/wp-content/uploads/2022/11/Child-Criminal-Exploitation-Knife-Crime-APPG-The-Online-Safety-Bill-and-CCE-Briefing.pdf>

will befriend other and make them believe they are in a loving relationship or friendship and coerce them into having sex with friends or associates.

Grooming



Party model

Children may be invited to a 'party' at a house or other location where they are targeted and groomed. Children are sometimes encouraged to link up with others via social media and bring friends along. They are often offered drugs and alcohol to ensure they comply with what is being asked, which may make victims of exploitation struggle to recall the events and make reporting difficult. Images of the child (sometimes called 'digital collateral') may be used to bribe them into compliance.

Gangs

Criminal gangs used sophisticated techniques to groom and exploit children that are not always visible or public. Children may have to perform sexual or criminal acts as part of an initiation process. Threats of violence and bullying may be aimed at those considered of lower status within a gang or as punishments, for crossing gang areas for example. Girls may be exploited through 'honey trapping', whereby she is tasked to infiltrate another gang through sexual advances. Boys may be forced to have sex with older women or girls of a similar age to prove their masculinity or with adult males as a form of punishment. Both genders may be exploited and trafficked in the movement or sale of drugs for the gang, and

this can involve 'plugging' whereby substances are transported in their anus. It has been found that the retrieval of substances can be sexually abusive and humiliating.

Organised Crime Groups

Organised Crime Groups (OCG) is defined as a group which: has at its purposes, or one of its purposes, the carrying on of criminal activities, and consists of three or more people who agree to act together to further that purpose (Home Office, 2018). Organised criminality usually centres on acquiring money, profit, influence, and power. Sexual gratification is a key motivator, and in particular, child sexual abuse.

OCGs will also use exploited children to recruit other children. They may be manipulated and blackmailed through indecent images or allegations of drug debts. It is essential to identify children exploited by OCGs and follow local safeguarding arrangements.

Online Grooming and Exploitation

Online grooming describes the process of developing a friendship or relationship with a child online, with the intention of abusing or exploiting them; it can include sexual and/or criminal exploitation.

Online exploitation can/may:

- occur through online chats, gaming, pictures, videos, or webcams,
- take place entirely online and the child may never physically meet their abuser,
- begin online then move offline or occur offline but include online abuse,
- involve the use of location tracking via specific location devices or apps to coerce/blackmail children into sexual or criminal activity; this is sometimes known as 'remote mothering',
- be perpetrated by individuals or groups, males or females, children or adults,
- be a one-off incident or a series of incidents over time,
- involve offers of money or online "gifts" (such as on gaming platforms) in exchange for on or offline sexual or criminal activity,
- involve threats, blackmail or coercion.

The term '[sextortion](#)' is increasingly being used to describe abuse where sexually explicit images or videos are exchanged online and the victim is subsequently blackmailed with threats to share the content with friends and family or more widely on the internet; this may involve requirements for money or further imagery. 'Sextortion' most commonly occurs on dating apps, social media platforms, webcam/live streaming sites or websites related to pornography. It is important to note where this involves under 18s, it should be considered child sexual abuse/exploitation and should be treated as such.

1.3 Summary of profile

Due to the secretive and hidden nature of exploitation, it is difficult to get an accurate picture of the scale of child exploitation in the UK. In 2019, the then Children's

Commissioner for England estimated that there were 27,000 children at high risk of exploitation by organised crime gangs⁴. Exploitation affects children of all ages and gender, however, is not always recognised as such. Barnardos highlight that 80% of boys (compared with 25% of girls) who were identified by a research team as likely victims of sexual exploitation had not been identified in official reports as being victims⁵.

Exploited children are rarely visible on the streets, and it is therefore difficult to gather meaningful data. Moreover, street based exploitation of children is only a small part of the bigger picture of exploitation of children by adults and other children.

A growing number of children are being exploited by adults they meet via the internet. This is referred to as 'online or non-contact abuse', and the access it affords to groom children for abuse has contributed to the invisibility of the exploitation of children.

Children of all ages are victimised through exploitation, not just teenagers and older children. Evidence suggests that children across all cultures, including a significant proportion of children in the care of Local Authorities, can be at risk of exploitation. Vulnerability and low self-esteem are the most common factors amongst children who are at risk of being exploited.

There is some evidence of the involvement of gangs in exploitation in Kent and Medway. Exploitation is used in gangs to exert power and control over members. Sexual exploitation is used in gangs to exert power and control over members. It can be part of the initiation of children, male and female, into the gang. Children may exchange sexual activity for status or protection. Gangs may entrap rival gang members by exploiting girls and young women or inflict sexual assault as a weapon in conflict. There are a few gangs identified by the Police within the County, and there is work undertaken to identify youth street groups (YSG) who exhibit the behaviours of a gang but where the risks are assessed as being at a lower level. These YSGs will be discussed at multi-agency meetings to identify how best to support vulnerable children and reduce the risk of harm to others.

Working Together 2023 makes clear that where there are concerns that a child is experiencing extra-familial harm, practitioners should consider all the needs and vulnerabilities of the child. Forms of extra-familial harm include exploitation by criminal and organised crime groups and individuals, serious violence, modern slavery and trafficking, online harm, sexual exploitation, teenage relationship abuse, and the influence of extremism which could lead to radicalisation.

1.4 Scope of the procedures

These procedures should be read in conjunction with the 'Kent and Medway Working with Children and Young People who are Sexually Active or Displaying Harmful Sexual Behaviour

⁴ <https://assets.childrenscommissioner.gov.uk/wpuploads/2019/02/CCO-Gangs.pdf>

⁵ [Child Exploitation, A Hidden Crisis - June 2023.pdf \(barnardos.org.uk\)](https://www.barnardos.org.uk/child-exploitation-a-hidden-crisis-june-2023.pdf)

Procedure' and particular note should be taken to guidance about assessing whether a relationship presents a risk of harm to a child.

The Kent and Medway Safeguarding Children Abused through Exploitation Procedures provides guidance on identifying concerns that a child may have been, is currently being or is at risk of being exploited.

Professionals should consult the [Kent and Medway Safeguarding Children Procedures](#) for concerns, decision and actions related to, but not covered, in the document.

These procedures should be reviewed and followed alongside internal organisational policy and governance.

2. Underpinning Principles for Multi-agency Responses

2.1 Principles

The principles underpinning the multi-agency responses to the exploitation of children include:

- Exploitation incorporates sexual, physical and emotional abuse, as well as, in some cases, neglect.
- Children of all ages and genders may be subject to any form of exploitation.
- Children do not make informed choices to enter or remain in exploitative situations. Rather, they do so from coercion, enticement, manipulation or desperation.
- Children may not always be aware that they are victim of exploitation, in particular where exploitation occurs online.
- The Sexual Offences Act 2003 creates a number of offences to protect children under 18 and acknowledge the vulnerability of younger children by removing their ability to consent when under 16; there are further measures to protect children under 13. It is an offence to cause or incite a child under 16 to engage in sexual activity.
- Exploited children should be treated as victims of abuse. Children will always be dealt with as actual or potential victims.
- With increasing use of online media and technology (such as mobile phones, games consoles, social networking sites, instant messaging and webcams etc.) children and adults need to be aware that it is a crime to take, make, permit to take, distribute, show, possess, possess with intent to distribute, or to advertise, indecent photographs or pseudo-photographs of any person below the age of 18, as per Section 1 of the Protection of Children Act 1978, as amended by Section 45 of the Sexual Offences Act 2003, to extend the definition of children from under 16s to under 18s. This behaviour may be referred to as 'sexting', 'youth produced' or 'youth involved' sexual imagery, image-based abuse, 'self-generated indecent images' or nudes and/or semi-nudes.
- When dealing with concerns relating to nude or semi-nude imagery, it can be helpful to consider the wider context; a one-off incident in a non-exploitative context may require education and support, whereas a pattern of incidents and/or where other factors suggest potential exploitation will require an enhanced multi-agency response. It will be helpful to be familiar with the ['Kent and Medway responding to nude and semi-nude image sharing: guidance for professionals'](#).
- Many sexually exploited children have difficulty distinguishing between their own choices around sex and sexuality, and the sexual activities they are coerced into; this means they may not recognise their experiences as being abusive or harmful. Additionally, professionals should understand that children can never be expected to predict, pre-empt or protect themselves from abuse. Irrespective of the context or circumstance, the responsibility always lies with the person who abused the child. This needs to be handled with care and sensitivity and professionals should be mindful of the language they use and seek to build trusted relationships which facilitate communication with children.
- The primary law enforcement effort must be against coercers and exploiters who may be adult but could also be the child's peers or other young people. Careful

consideration needs to be given to criminalising offending behaviour by children who are also victims.

- Exploitation of a child is an Adverse Childhood Experience (ACE). Experiences of trauma, including exploitation, can have an impact on the brain development of a child. It is important that a trauma informed approach is taken towards children who have experienced exploitation.
- Swift sharing of intelligence and information amongst agencies is key to effective responses to concerns of child exploitation. A multi-agency plan which guides the response to concerns for individual children is needed to ensure the right support is delivered at the right time to prevent further risk of harm.

2.2 Child protection procedures

Children who are exploited are children in need of services under the Children Act 1989. They are also children in need of protection. A discussion should take place via Complex Harm Meeting or Medway Exploitation Discussion (MED) for all children considered at risk of exploitation. Child protection procedures must always be followed where:

- The child is at immediate risk of significant harm and has other additional vulnerabilities.
- There is a concern that the exploitation is being facilitated by the child's parent/carer.
- There is concern that a related or unrelated adult in a position of trust or responsibility to the child is organising or encouraging the exploitation. Involvement of the relevant Local Authority Designated Officer service should also be considered in these circumstances.

3. Exploitation Assessment

3.1 Vulnerability factors to exploitation

Children are more vulnerable to abuse through exploitation if they have experienced one or more of the following factors. These factors are not listed in order of importance, each carries equal weight. This list is also not exhaustive.

- Child Sexual Abuse
- Domestic Abuse within the family
- Family breakdown
- Physical abuse and emotional deprivation
- Bullying in or out of education
- Family involvement in or experiences of exploitation, including siblings who have been exploited into involvement in serious organised crime or county lines etc
- Parents with a high level of vulnerabilities (drug or alcohol misuse, mental health issues, learning disability etc)
- Drug or alcohol misuse
- Mental health issues
- Children with Special Educational Needs or Disability - neurodiverse children with complex mental health issues have been noted in research to be particularly vulnerable to exploitation
- Children who are Looked After, particularly those in residential care
- Children who are missing from home or care
- Involved in the Criminal Justice System
- Children who are isolated and feeling a lack of belonging, including being isolated from family or friends
- Changing friendship groups
- LGBTQIA+ children
- Children who are vulnerably housed
- Children who have experienced radicalisation or exposure to extremism
- Children who are experiencing high levels of deprivation
- Children who are absent or missing from education for prolonged periods and/or on repeat occasions, including non-attendance or exclusions
- Children with no or limited online safety education and/or support
- Not in education, employment or training (NEET).

Children may also not overtly present any of these vulnerabilities, this does not mean that they are not vulnerable to exploitation. It is known that perpetrators of child exploitation often seek out less 'obviously vulnerable' children to exploit, as their exploitation may be undetected for longer periods of time. It is important that professional curiosity is employed to understand whether a child is experiencing exploitation.

3.2 Kent and Medway Child Exploitation Identification Tool

The Kent and Medway Child Exploitation, Identification, Assessment & Planning Tools have been developed to be used by practitioners working with children and parents or carers, both in a statutory and non-statutory capacity across all levels of support. The tools can be accessed via the links below.

Kent	Medway
Via the KSCMP website	Via the MSCP website

The first tool is an identification tool which helps professionals to identify whether a child may be vulnerable to exploitation, is being groomed or targeted for the purposes of exploitation or is being exploited. The second tool is an extension of the identification tool, it helps the professional to draw out the analysis, identify the most appropriate intervention(s) and formulate a plan which reduces harm in the contexts it is occurring.

To promote child centred practice, it is important to engage with and listen to children as well as parents and carers where appropriate, to understand their needs and experiences when completing the toolkit.

3.3 Initial Professional Response

Professionals in all agencies should be alert to the possibility that a child with whom they are in contact may be being exploited. The professional may already have concerns about the child e.g. that they are missing education, frequently missing from home, misusing substances, is depressed or self-harming etc.

The professional should discuss their concerns with their agency's nominated safeguarding lead and use the Kent and Medway Exploitation Identification Tool to determine the perceived level of risk of significant harm posed towards the child.

In cases where a child is considered to be at low risk of harm a plan for focused early intervention and diversion should be made to safeguard the child. Agencies should consider, in discussion with the Local Authority Children's Service, the extent to which the agency is able to meet the child's needs themselves as a single agency, and how to proceed if not.

In cases where the risk is considered to be substantiated – medium or high, the professional and/or their nominated adviser should make a referral to the Local Authority Children's Services using the appropriate referral form.

3.4 Child Exploitation Intelligence Sharing Form (e-Intel)

The CE Intelligence portal allows multi-agency staff to share information relating to child exploitation concerns that may be important or relevant to Kent Police. Information should be shared to develop the understanding of CE across Kent and Medway, enabling a targeted response to prevention and disruption. The CE Intelligence portal should be utilised for the sharing of **non-urgent** information relating to CSE, CCE, County Lines, Gangs, Modern Slavery and Human Trafficking. Information will be handled in accordance with the Kent and

Medway Information Sharing Agreement. If there is an **immediate risk or a criminal offence has taken place**, please contact Kent Police on 101, or in an emergency call 999.

If there is any concern that a child is being exploited in any way, the information should be submitted regardless as to whether this has been corroborated.

Any questions or concerns regarding the CE Intelligence portal should be directed to Kent Police or the relevant organisation lead. Contact details can be found within the [guidance document](#).

3.5 Disrupting child exploitation

As well as ensuring the appropriate recognition of and response to children who are at risk of or are experiencing exploitation, Kent and Medway partners should work pro-actively to address the risks of exploitation of children in the area. Through collaborative working to understand the scope and scale of child exploitation, strategies and plans should be implemented to address identified risks and issues. The [Home Office Child Exploitation Disruption Toolkit](#) is available to assist in these efforts.

Professionals are reminded that there is a statutory duty to report modern slavery and trafficking via the [National Referral Mechanism](#). Further information can be found in the Kent and Medway Policy and Procedures Manual, in the following chapters:

- [Children from Abroad, including Victims of Modern Slavery, Trafficking and Exploitation](#)
- [Gang Activity, Youth Violence and Criminal Exploitation Affecting Children](#)

4. Intervention

4.1 Early Multi-agency Intervention

Interventions to interrupt abuse through exploitation and support children to recover a healthy lifestyle and more likely to be successful if a child who is at risk can be identified and information about concerns shared within a multi-agency support network as early as possible. Multi-agency collaboration and information sharing is key to early intervention and support, to prevent risk of harm or further harm, and assist recovery.

Professionals are often in a position of having to develop the child's trust, or having established this are concerned about breaking that trust through the sharing of confidential information with other agencies. These issues should be discussed with the agency's designated safeguarding lead and efforts made to share information as soon as possible.

A professional or agency view that a child is low risk i.e. has a vulnerability to being harmed through exploitation may be inaccurate. Sharing information about the child with other agencies may reveal that there is a medium or high risk i.e. that there is a substantiated concern or that the child is in need of immediate protection. The process for gathering information from the Police is in line with current safeguarding procedures and information sharing agreements.

All professionals should maintain clear records of contact with the child, their concerns, all information shared and discussed and with whom, and decisions made and actions taken. It is equally important to record when a decision is made **not** to take action or share information with a clear rationale.

All professionals working with vulnerable children should be aware and professionally curious that one vulnerability could put children at risk of other risks:

- Gangs and criminal exploitation
- Missing person from home or care
- Absent or missing from education
- Radicalisation.

Other risks include:

- Poor education attendance
- Exclusions from education
- Not in education, employment or training (NEET)
- Involvement in the criminal justice system
- Health deterioration including mental health separate physical and mental/emotional wellbeing.

It is important that professionals working with children assess the child for all risks, threats and vulnerabilities ensuring we work in partnership to reduce and minimise risks.

Where there is disagreement between professionals and services about the level of risk and required response, the Kent Escalation and Professional Challenge pathway or Medway Challenge and Escalation policy should be used, to consider and resolve points of challenge and difference.

Early Help – Medway

Early Help in Medway is focussed on additional support that a family needs to enable them to thrive and for children to meet their potential.

In Medway, the Early Help Assessment is the process for supporting children and families with additional needs through early identification, swift intervention, and a planned, co-ordinated response.

Further information about [Medway's Early Help Offer can be found online](#).

4.2 Evidence of vulnerability to exploitation

Kent

In cases where there are indications that a child is at risk of being groomed for abuse through exploitation, professionals in **any agency** should, after consultation with their agency's designated safeguarding lead, follow the Kent Child Protection procedures.

If you are concerned about a child, refer to the Kent Support Level Guidance which will help inform you whether to make a referral to the Kent Front Door. The exploitation screening tool may help you to formulate how concerned you should be about a child. The Front Door will assess whether Early Help or Social Work intervention is required. If threshold is not deemed to have been met, the Front Door may have a conversation outlining other support the referrer may wish to access.

If you are concerned regarding exploitation in a context (for instance, a group, location or an online space) a referral should be made to the relevant District Contextual Safeguarding Meeting (DCSM) using the Location Referral Form. Individuals should only be discussed if the nature of extra familial risk or harm is at Support level 3 or 4 (where the child has a current plan) and the discussion focusses on those extra-familiar risks. Referral is from their case holder, using the Exploitation Tool. The DCSM is not an additional 'Front Door'. If there is concern about children who are not open at Support Levels 3 or 4, Adolescent Services can be consulted about whether children should be referred to the Front Door for case holding support.

Medway

Child Protection procedures under Working Together 2018 will be followed for the assessment of all cases of potential exploitation of children, whether it is possible criminal, sexual or contextual safeguarding (places and spaces) which can include harmful sexual behaviours by adolescents upon others. Where it is believed that a child is experiencing or is likely to experience significant harm then a multi-agency strategy discussion will be convened. If you have a concern about a child that is not already open to children's social

care, you should seek safeguarding supervision or have a conversation with your supervisor or designated safeguarding lead to agree what else needs to happen. This may include a referral for statutory intervention, safeguarding concerns or Early Help made through First Response into the Single Point of Access via the portal. If the child is already an open case to children's social care and the risks of harm are not immediate and significant then the case will be considered at a fortnightly service level Missing Exploitation Discussion chaired by the Service Manager of that service. Relevant partners involved with each individual child discussed can be considered to be invited to attend to ensure full information is shared to enable robust safety planning to be considered and next steps to be made. If this meeting identifies that there are risks relating to Groups, Places or Spaces then these concerns are escalated to and considered at Medway Contextual Safeguarding Panel. This meeting is held monthly and is chaired by the Service Manager in First Response and attended by representatives from the Kent Police, Health, Medway Task Force, YOS, Targeted Youth Support, Family Solutions, and any other relevant professionals. During the meeting, minutes will be recorded, data collected, mapping undertaken, actions made and driven forward by relevant agencies. Intelligence, themes and trends gained at Medway's Contextual Safeguarding Panel will be presented via a report to the MSCP Kent and Medway Joint Exploitation Group. The JEG will provide the strategic links with the Community Safety Partnership and the Adult Safeguarding Board.

4.3 Evidence the child is being groomed or targeted for exploitation or is being exploited

In cases where a child is considered to be at high or medium risk of exploitation, this assessment should be reached by the professional in consultation with their agency's nominated safeguarding children advisor. The professional and/or the safeguarding lead should make a referral to the Local Authority Children's Services, in line with their referral procedures.

As in all cases of suspected abuse and neglect, the Local Authority Children's Services will respond in one of three ways and will advise the referrer which plan is in place:

- An assessment will be undertaken to identify the child's level of risk and need for service provision.
- The assessment may identify the child to be at risk of significant harm and in need of protection. This will necessitate a child protection enquiry and a child & family assessment of need under Section 47 of the Children's Act 1989.
- Where no concerns are identified, there will be no further action. In these cases, Local Authority Children's Services will advise the referrer verbally and in writing as to why the agency is to take this position.

In cases where a Social Services assessment confirms that a child is at risk of significant harm, they will convene a Strategy Discussion in order to determine whether child protection enquiries should be made.

Child exploitation involves varying degrees of coercion, reward, secrecy and fear, which means that interventions to support and rehabilitate children may need to be long-term, and safeguarding and support plans should be progressed at the child's pace.

4.4 Child Sexual Exploitation

In cases where a child is believed to have experienced child sexual exploitation, sexual assault or rape, there are some further specific considerations. Sexual activity with a child under the age of 13 is defined as statutory rape.

In all cases where sexual assault or rape is suspected or alleged, the Kent and Medway Pathway for Child Sexual Abuse Medicals should be followed.

4.5 Transitional Planning

It is important to recognise that the risk of exploitation to children does not necessarily disappear when they become adults. Information must be shared between services during any transition of support and a nominated person be responsible to ensure ongoing management of the risk. Multi-agency partners should ensure that planning for the ongoing needs and support of children approaching their 18th birthday is undertaken at an early stage.

5. Role of Local Authority Children's Services

5.1 All children

The Local Authority Children's Services hold the lead responsibility for responding to children abused through or at risk of exploitation.

On receipt of a referral, the Local Authority Children's Services must consider whether the child is at immediate risk of significant harm, and if so, child protection procedures apply.

If child protection procedures are not considered appropriate, the Social Worker, in discussion with their Team Manager and/or Lead Professional/Child Protection Manager, will identify and assess the level of risk of harm to the child.

The Local Authority Children's Services are encouraged to collect information to monitor prevalent activity patterns and effectiveness of interventions for children who are exploited in their area. They are expected to complete the e-Intel and submit to Kent Police.

When a case is already allocated, concerns may be presented by another professional or by the child's Social Worker. The risk of harm to the child's needs are to be reassessed in accordance with their responsibilities under the Children Act 1989. In light of new information, a discussion is held with the relevant team or service manager and lead professional/child protection manager, and the case is progressed.

The outcome of the assessment should be discussed within an Outcome Strategy Discussion and an appropriate safeguarding and support plan put in place.

Resources which may be appropriate as part of the safeguarding and support plan include:

- Provision of counselling, health, and sexual health services.
- Provision of advice, support and mentoring.
- Opportunity to access leisure, education, employment, and housing.
- Direct provision of family support service.
- Use of accommodation.
- Application to court for a care or supervision order.
- In extreme circumstances, application for a secure accommodation order (Section 25 of the Children's Act 1989).

5.2 Children in the care of local authorities

When a referral is received regarding a Child in Care, the allocated Social Worker must inform their Team Manager and Independent Reviewing Officer.

A strategy discussion will take place, in accordance with the procedures outlined at 5.1. In addition, the following factors should be taken into account:

- The risks of other children in the placement.

- Whether the child should remain in their present placement.
- Whether effective safeguarding measures can be put in place to reduce the risks sufficiently in the current placement.

As outlined at 5.1 a safeguarding and support plan should be drawn up, which will form part of the overall care plan for the child. The Social Worker must alert the Service/District Manager for a child who is in care of the Local Authority and where there are concerns regarding exploitation.

The Strategy Discussion should consider the appropriateness and method of informing the child's parent(s). If the child is accommodated, the parent(s) must be informed of all significant matters. When a child is subject to a Care Order, generally their parent(s) should be informed. A decision not to inform the parent(s) should be authorised by the Team/Service Manager and recorded on file.

The child's Social Worker and carer(s) should put in place a written Risk Management Plan, which balances the need for assertive action and the need to not unduly increase the likelihood of the child running away, in response to the action being taken, and possibly being at even greater risk. Any consideration of restriction or liberty or confiscation of property needs to be agreed by the Team/Service Manager responsible for the child's case.

Active work should be undertaken with the child to address any concerns of their self-esteem, relationships, sexuality, sexual relationships, and health. It is suggested that evidenced based, researched programmes are used and included as part of the team around the child/family.

Other children in the placement should be monitored to help identify if they are also at risk of harm from, or are in some way supporting, exploitation.

If the child is in a residential unit, the staff should be asked to take positive action to clarify and record concerns and minimise the child's involvement in exploitation. If concerns are confirmed, the following steps should be taken:

- Treat the child as a victim of exploitation, not a criminal.
- Ensure that all relevant information is recorded in the child's care plan and file concerning adults and identifying information e.g. car appearance, telephone activity, the child's patterns of going missing etc, together with decisions and clear directions for actions, including timescales.
- Make every effort to dissuade the child from leaving by talking to them involving them in alternate activities, and ensuring they have the resources to attend, including escorting where necessary.
- Ensure that the child is aware of the legal issues involved, including advice that staff cannot safeguard money which is reasonably suspected to have been gained through exploitation. When staff do acquire such money, they must retain it and seek legal advice.
- Consideration may be given to monitoring telephone/video calls, letters and all other forms of electronic communication. Whilst consideration may also be given to

preventing the child from receiving incoming calls or removing/reducing online access and/or confiscating mobile devices, this can give a false sense of safety and instead can create additional risk, for example if a child goes missing by limiting the ability to contact and locate the child via a mobile phone location. Instead, it is preferable to develop a plan to monitor and manage access to devices, accounts and communications, for example, being present when calls are made/received and opening letters in the presence of the child, with a clear rationale for this included within the care plan.

- Monitor callers to the home, or adults collecting children by car. This may involve turning visitors away or passing information directly to the Police.
- Monitor any suspicious activity in the vicinity of the home and inform the Police.
- Use physical control where appropriate, in accordance with agreed policy and practice guidance, to prevent the child leaving home and being exploited.
- Where these efforts fail and the child leaves, staff need to decide whether to follow them and continue to encourage them to return.
- If they will not return, staff should inform the Police and pass on relevant information.
- Liaise with outreach agencies, so they can look out for the child who has gone missing.
- Offer sensitive and welcoming responses to children returning home.

If the child is in foster care the Social Worker and the Fostering Link Worker should meet with the Foster Carer to decide which of the above steps could reasonably be taken by the Foster Carer. This needs to take place in consultation with the Fostering Team Manager.

The child's behaviour and attitude may be extremely challenging. Carers and staff will require ongoing support and training in knowing how to respond. These needs must be considered and resources identified, either by the manager of the residential unit or the Fostering Link Worker.

Professionals and carers should be aware of their own position in relation to the child. Carers or staff may be viewed with suspicion or contempt.

5.3 Involvement of groups of children in care

Where there is knowledge or strong suspicion that children are involved in exploitation together, or are being controlled by the same person, particularly when that person is a child, there will need to be additional planning, including consideration of the use of child protection and/or organised abuse procedures.

The Strategy Discussion will need to ensure that there are no inconsistencies between individual children's care plans. Where the placement is in another authority, or children from other authorities are involved, that authority's child protection manager (or equivalent) must be contacted to discuss which authority is to take overall responsibility for convening the meeting and coordinating the response.

5.4 Leaving care/aftercare

The same procedures as above should be followed in cases where young people in the leaving care service are considered to be at medium or high risk of abuse through exploitation.

The Pathway Plan for any child where there are concerns about exploitation should specifically identify their vulnerability to exploitation, and address the factors known to impede successful recovering from exploitation e.g. homelessness, poverty, lack of educational and employment opportunities, lack of supportive social contacts etc. The Social Worker must alert the Service/District Manager for a child who is a relevant child and where there are concerns for exploitation.

5.5 Children open to Youth Justice Services

Children open to Youth Justice Services are often vulnerable to or have been abused through exploitation, on occasion this may have directly resulted in their involvement in the Criminal Justice System. The Youth Justice assessment tool contains sections that specifically explore a child's vulnerability to exploitation. Where information becomes known to a Youth Justice Practitioner that indicates that a child has been abused through or is at risk of exploitation, this information must be discussed with their team manager and if agreed, a referral made to the local authority front door, if not already open to children's social care. The same procedures in 5.1 should be followed in cases where children in the youth justice service are at medium or high risk of abuse through exploitation.

6. Role of the police

6.1 Legislation

Section 47 to 51 of the Sexual Offences Act 2003⁶ deal with the exploitation of children. The act creates a number of offences, including:

- Paying for the sexual services of a child
- Causing or inciting sexual exploitation of a child
- Controlling a child in relation to sexual exploitation
- Arranging or facilitating sexual exploitation.

6.2 Role of the police

The priority for the Police is the investigation and prosecution of offenders who have been involved in abusing the child through exploitation. This role should be undertaken in accordance with the principle of multi-agency cooperation to safeguard children.

Police may become aware of children at risk of exploitation through everyday policing activity, in the course of other criminal investigations and by intelligence gathering. On every occasion, and in consultation with partner agencies the Police will employ disruption tactics to prevent opportunities for perpetrators to operate and premises to be used for such purposes.

The initial Police response to the discovery of a child who is being or is at immediate risk of being abused through exploitation, must be to remove them from the source of harm, using Police protection powers if necessary, and ensure that evidence is secured.

The Police Officer noting the concern will complete a 'Child Protection Risk Assessment' detailing the circumstance as well as the child's appearance, any words spoken, activity, relationships & dynamics along with details of the environment which the child is living and associating in. This risk assessment is then assessed by the Central Referral Unit, and if deemed appropriate refer to the Local Authority Children's Services. If a crime has been committed, the matter will be allocated to an appropriately trained officer to investigate.

Criminal action in respect of the child in exploitative circumstances will be carefully considered with partners. Particular attention should be paid to the following:

- The age and vulnerability of the child.
- The protection of other children.
- Where a child has been subject of exploitation it is possible that they may also have been the victim of modern slavery or human trafficking offences.

All interviews with the child as an actual or potential victim should be conducted, as far as possible, in accordance with the best evidence interview (ABE). Where possible a child's social worker should be present for any ABE interview.

⁶ [Sexual Offences Act 2003 \(legislation.gov.uk\)](https://legislation.gov.uk)

7. Role of Health Services

7.1 Role of Health Services

Health's role in identify children at risk and helping those who have already been exploited is crucial and health professionals in a variety of settings can help to influence this.

Health professionals are in a key position to recognise and assist children and have several key roles including:

- Identifying the warning signs of risk or indicators of exploitation
- Engaging with children
- Seeking and using advice, adhering to safeguarding policy and procedures
- Sharing information with agencies as appropriate.

It is vital that as professionals, we continue to listen to the voice of children to learn from their experiences and improve the services we provide.

Children affected by exploitation can present with a range of physical and or emotional problems whilst accessing care in primary, secondary or tertiary health settings which may include but are not limited to School Health Services; Sexual Health Services; Unplanned/Urgent Care Services; Mental Health Services; and Drug and Alcohol Services.

It is therefore essential that all health care professionals are aware of the range of presentations, which may include but are not limited to; poor self-care, sexually transmitted infections, contraception, pregnancy, termination, drug and alcohol problems and self-harming behaviours, and that they know how to respond appropriately.

Where health professionals have immediate concern, they should follow internal safeguarding procedures and seek further safeguarding advice and guidance in discussion with their safeguarding team and where applicable collaborate with partner agencies. Where the concerns are not immediate or are unclear, staff should discuss the case with the internal safeguarding team and formulate a plan of action to inform risk assessment and decision-making, utilising the relevant proformas. All health care professionals have a legal duty to adhere to principles of contemporaneous record keeping.

How healthcare staff and agencies work together to promote effective early intervention is of critical importance in supporting children who are sexually exploited. It is vital that professionals share and receive information as part of local multi-agency arrangements. Safeguarding considerations override the usual requirements for confidentiality and staff must be confident to act accordingly, following the advice and guidance as established within relevant policy and keeping the child informed as appropriate.

Further information can be found within the following:

- Help after sexual assault or rape: [Help after rape and sexual assault - NHS \(www.nhs.uk\)](https://www.nhs.uk)
- Kent and Medway Sexual Assault Referral Centre: [Overview - Beech House Sexual Assault Referral Center \(SARC\) - NHS \(www.nhs.uk\)](https://www.nhs.uk)
- How to spot child sexual exploitation: [How to spot child sexual exploitation - NHS \(www.nhs.uk\)](https://www.nhs.uk)

8. Role of Education Services

8.1 Prevention

Staff in schools, colleges, early years settings, and other education establishments, are uniquely placed to recognise and refer children who are abused through exploitation. They are also in a position to help children avoid being exploited and support abuse children.

Education settings play a crucial role in preventative education and should ensure that children are taught about safeguarding through a variety of teaching and learning opportunities, as part of teaching children how to keep themselves and other safe, including online as identified within Keeping Children Safe in Education (KCSIE)⁷. This may include covering relevant issues through Personal, Social, Health and Economic Education (PSHE), tutorials and/or through Relations and/or Relationships and Sex Education (RSE). An effective and appropriate safeguarding curriculum can help children make informed and healthy age/developmentally appropriate choices about issues such as healthy and respectful relationships, boundaries and consent, recognising abusive relationships (including coercive and controlling behaviour), online safety, substance misuse, the concepts of, and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, and how to access support. In teaching these subjects, schools must have regard to the statutory [‘Relationships and sex education \(RSE\) and health education’ guidance; additional resources to support safeguarding education are listed in KCSIE.](#)

8.2 Recognition and referral

Education leaders (including Headteachers, Governing Bodies and Proprietors) should ensure that their setting is compliant with the statutory safeguarding obligations in relation to child exploitation (including opportunities to teach safeguarding, staff safeguarding and child protection training, child protection policies and procedures and multi-agency working) as identified within KCSIE.

All members of staff working with educational settings should be alert and competent to identify and act upon concerns that a child is at risk of or is experiencing abuse through and form of exploitation. Members of staff within schools and colleges should read and understand the relevant sections of KCSIE; staff who work directly with children should read at least Part One and Annex B.

Where there are any concerns about exploitation which may be considered as child-on-child sexual violence and/or sexual harassment, schools and colleges are expected to respond in line with part Five of KCSIE.

The Designated Safeguarding Lead (DSL) in each educational setting should monitor information to identify when any child in the setting or community may be being targeted for exploitation.

⁷ <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Because of the probability of attendance issues with exploited children, a referral to the Kent PRU Inclusion and Attendance Services (PIAS)/ Medway Advice, Attendance and Support to Schools and Academies (AASSA) is likely to have been made or considered. School Liaison Officers (SLOs) should be alerted to the possibility of exploitation if concerns exist when referrals are made to the service. In Medway, these are known as Attendance Advisory Practitioners. In their general assessment and ongoing work with children and their families, and liaison with school staff, School Liaison Officers (SLOs) can identify children who are being or are at risk of being abused through exploitation. Where the child or known to an SLO, they would be expected to attend the network meetings or Strategy meetings and contribute to developing the child's safeguarding and support plan.

Where education settings have immediate concerns that a child is at risk of exploitation, they should make a referral to the Local Authority Children's Service and the Police. This will typically via the DSL; however, all education staff should be aware of the processes to follow if they believe a child may be at risk of exploitation, for example, if a DSL is unavailable, or they have reported a concern to a DSL but believe a child is still at risk. If the concerns are not immediate, or are unclear, the DSL should discuss their concerns with an Area Safeguarding Advisor from the Education Safeguarding Service (Kent) or Education Safeguarding Coordinator (Medway).

DSLs should ensure that they share any appropriate information or soft intelligence about possible exploitation risks for children within the setting or in their wider community promptly with Kent Police through the e-Intel portal.

9. Role of Community and Non-Traditional Partners

9.1 Role of leisure and community services

The role of leisure and community services staff in relation to children abused through exploitation is in the prevention, recognition and referral stages.

Where staff, such as play workers, leisure centre workers or librarians have immediate concerns they should, together with their agency's safeguarding lead, make a referral to the Local Authority Children's Services. Where the concerns are not immediate or are unclear, staff should discuss the case with the safeguarding lead.

In the case of street activity being noted, including within parks, staff should contact the Police.

9.2 Support Services

Government guidelines on children who are sexually exploited emphasise the importance of a multi-agency approach, which includes voluntary and community groups/agencies: *'The child may seek to avoid statutory services. They are more likely to respond to informal contact, for example, with health outreach workers, or local non-statutory agencies. The primary concern of all those involved must be the welfare of the child, and decisions on the sharing of concerns about a child's safety must form part of local protocols between Police, Local Authority Children's Services, Health and Education Authorities, and Non-Statutory Agencies'*.

There is a wide range of specialist (drug misuse, HIV prevention, homelessness, counselling, and advice) and other voluntary and community agencies/groups (youth clubs, sport/drama groups, faith groups, and churches etc.) who may be well placed to identify children who are at risk of, or are experiencing abuse through exploitation; because:

- Voluntary and community sector agencies often have a close relationship with their local communities.
- Voluntary and community sector agencies can develop relationships of trust with children and maintain a link to the child if they become 'lost' to statutory services.
- Outreach agencies are often the first point of contact for children or in risk situations.
- Specialist voluntary agencies often have the opportunity to provide vital health/harm minimisation/risk reduction support.

It is essential that voluntary and community groups/agencies operate as multi-agency network partners in order to provide children with access to the widest possible range of intervention and support services.

Youth services and all community groups should continue to run programmes around Personal, Social, Health and Economic Education (PSHE), tutorials and/or through Sex and Relationships Education (SRE). An effective and appropriate curriculum can help children

make informed and healthy choices about issues such as sexual activity, grooming techniques, online safety, drug use, and keeping themselves safe.

9.3 Recognition and referral

Professionals and volunteers in voluntary and community groups/agencies should be alert and competent to identify and act upon concerns that a child is at risk of or experiencing abuse through exploitation. They are well placed to receive and verify information about abuse and exploitation of children in the local community.

Each voluntary and community group or agency should have a nominated safeguarding lead.

All staff and volunteers working in voluntary and community agencies/groups should be aware of the Kent and Medway Child Exploitation Identification Tools. Where the level of risk is determined as significant a referral should be made to the Local Authority Children's Services. In cases where the level of concern is not immediate or clear staff should discuss the case with their safeguarding lead.

Once the referral is made, all partners involved in the child's life have a responsibility to support safeguarding and reduce the risks, threats and vulnerabilities.

10. Further resources and references

- [All-Party Parliamentary Group on Child Criminal Exploitation and Knife Crime: Online Safety Bill and Child Criminal Exploitation \(CCE\)](#)
- [Barnardo's Child Sexual Abuse and Exploitation](#)
- [Barnardo's Child Exploitation: A Hidden Crisis](#)
- [Beech House Sexual Assault Referral Centre](#)
- [Centre of Expertise on Child Sexual Abuse](#)
- [Children's Commissioner Keeping Kids Safe: Improving safeguarding responses to gang violence and criminal exploitation](#)
- [Child Exploitation Online Protection](#)
- [Children's Society: Appropriate Language in Relation to Child Exploitation](#)
- [Children's Society: County lines and criminal exploitation toolkit](#)
- [Department for Education Child Sexual Exploitation: definition and guide for practitioners](#)
- [Department for Education: Safeguarding children who may have been trafficked](#)
- [Home Office Child Exploitation Disruption Toolkit](#)
- [Home Office: Criminal Exploitation of children and vulnerable adults: county lines](#)
- [Home Office National Referral Mechanism](#)
- [Home Office Modern Slavery: how to identify and support victims](#)
- [Home Office Serious Violence Strategy](#)
- [Home Office: No Place to Hide: Serious and Organised Crime Strategy 2023-2028](#)
- [Keeping Children Safe in Education](#)
- [Kent Escalation and Professional Challenge Policy](#)
- [Kent Missing Children from Home and Care Procedure](#)
- [Kent and Medway Information Sharing Agreement](#)
- [Kent and Medway pathway for child sexual abuse medicals](#)
- [Kent and Medway responding to nude and semi-nude image sharing: guidance for professionals](#)
- [Kent and Medway Violence Reduction Unit](#)
- [Kent and Medway Prevent](#)
- [Kent and Medway Safeguarding Adults Board \(KMSAB\) Exploitation, Modern Slavery and Human Trafficking Policies](#)
- [Kent Exploitation Tools and Guidance](#)
- [Medway Exploitation Tools and Guidance](#)
- [Medway Missing Procedure](#)
- [Research in Practice Multi-agency Practice Principles for Responding to Child Exploitation and Extra-Familial Harm](#)
- [Sexual Offences Act 2003](#)
- [Tackling Child Exploitation: Multi-agency Practice Principles for responding to child exploitation and extra-familial harm](#)
- [Working Together 2023](#)