

MY OASIS

Therapeutic Alternative Provision

Child Exploitation Policy

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Policy Overview

At My Oasis Therapeutic Alternative Provision, safeguarding the welfare and safety of all young people is our highest priority. This policy sets out our approach to identifying, responding to, and preventing Child Exploitation, including Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), and County Lines Exploitation. All forms of exploitation are a serious safeguarding concern that can have long-lasting impacts on a young person's development and well-being.

This policy outlines the roles and responsibilities of staff in recognising the signs of exploitation and responding to concerns in line with legal requirements and local authority procedures.

Policy Aims

- Ensure all staff understand what CSE, CCE, and County Lines exploitation are, and how they can affect young people.
- Provide a clear definitions and indicators to help identify young people at risk of or experiencing exploitation.
- Promote early identification and intervention to protect young people from harm.
- Clarify staff responsibilities for reporting concerns and following safeguarding procedures.
- Outline how My Oasis works with external agencies in responding to exploitation.

Policy Scope

This policy applies to all teaching, non-teaching, support, supply, peripatetic, contract staff, volunteers and wider groups working in or on behalf of My Oasis. All references in this document to 'staff' or 'members of staff' should be interpreted as relating to them mentioned unless otherwise stated.

Definitions

Child Sexual Exploitation (CSE)

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 young person into sexual activity. This may be in exchange for something the victim needs or wants, or for the financial gain or increased status of the perpetrator or facilitator.

CSE:

- May involve physical sexual contact (penetrative and non-penetrative acts).
- Can include non-contact sexual activity (e.g. sharing images, sexual messages, webcam activity).
- Can occur online, offline, or in both environments.
- May take place without the victim's immediate knowledge (e.g. images/videos shared without consent).
- Can affect any young person, regardless of age, gender, background, or ability – including those aged 16 or 17 who may legally consent to sex.
- Can be perpetrated by adults or other young people, and by individuals of any gender.
- Can occur as a single incident or a pattern of abuse, ranging from opportunistic exploitation to complex organised abuse.
- Often involves victims who do not recognise the exploitation, as they may believe they are in a loving or consensual relationship.
- Even if a young person appears to consent, manipulation, coercion, or deceit means that true consent has not been given.

Child Criminal Exploitation (CCE)

CCE is a form of abuse where individuals or groups take advantage of an imbalance of power to coerce, control, manipulate or deceive a young person into criminal activity. This may be in exchange for something the young person needs or wants, for the financial gain or status of the perpetrator, or through violence or threats.

CCE:

- Can be perpetrated by males or females, adults or other young people.
- Can occur as a single incident or through repeated exploitation over time.
- May involve physical contact or occur entirely online.
- Forms include transporting drugs or money, working in cannabis factories, shoplifting, vehicle crime, or engaging in serious violence.
- Victims may be threatened, trapped in debt, manipulated into carrying weapons, or made to believe they are choosing to participate.
- Both boys and girls are at risk, and criminal exploitation can also increase the risk of sexual abuse.

County Lines Exploitation

County lines is a type of child criminal exploitation involving gangs or organised criminal networks exporting illegal drugs into other areas (often from urban to rural) using dedicated mobile phone lines or “deal lines”.

County Lines

- Young people and vulnerable adults are used to transport, store, and distribute drugs and money.
- Exploitation involves coercion, intimidation, threats, sexual violence, and weapons.
- Victims may be trapped through drug debts or threats to themselves or their families.
- Often hidden behind poor attendance, withdrawal from education, or other risk factors.

Legislation and Statutory Guidance

This policy is written in accordance with the following statutory frameworks and guidance:

Primary Legislation

- Children Act 1989 – Establishes key principles, including the welfare of the child being paramount, and sets out duties for local authorities and courts.
- Children Act 2004 – Introduced a statutory duty for agencies to cooperate in safeguarding and promoting the welfare of children.
- Education Act 2002 – Places duties on education providers to safeguard and promote the welfare of students.
- Sexual Offences Act 2003 – Defines sexual offences against children, including grooming and exploitation.
- Serious Crime Act 2015 – Amends the law to improve protection for victims of FGM and child cruelty.
- Domestic Abuse Act 2021 – Recognises children as victims in their own right and defines abusive behaviours.
- Human Rights Act 1998 – Ensures fundamental rights and freedoms are respected in safeguarding decisions.
- Equality Act 2010 – Provides a legal framework to protect individuals from unfair treatment and promotes a fair and more equal society.
- Data Protection Act 2018 and UK GDPR – Regulates the use and protection of personal data, including sensitive safeguarding information.

Statutory Guidance

This policy is informed by the following guidance:

- Keeping Children Safe in Education (KCSIE 2025), DfE. Statutory guidance for all schools and educational settings on safeguarding roles, responsibilities, and procedures.

- Working Together to Safeguard Children. Statutory guidance for inter-agency working and safeguarding arrangements.
- What to do if you're worried a child is being abused (2015). Non-statutory advice to support practitioners in identifying and acting on child abuse and neglect.
- Information Sharing: Advice for Practitioners (2018). Non-statutory guidance outlining principles and best practice for sharing information to safeguard children.

Local Frameworks

We follow the safeguarding procedures and protocols set out by:

- Wigan Borough Safeguarding Children Partnership (WBSCP).
- Greater Manchester Safeguarding Children Procedures.
- NSCP Protocol for Domestic Abuse – Notifications to Schools.
- Local Thresholds of Need and Response Framework.

We work closely with the local authority, social care, police, and other relevant agencies to ensure children receive coordinated and timely support.

Related Policies and Procedures

This policy should be read alongside the following:

- Safeguarding and Child Protection Policy.
- Behaviour Policy.
- Anti-Bullying Policy.
- E-Safety and Acceptable Use Policy.
- Child-on-Child Sexual Abuse Policy.
- Safer Recruitment Policy.
- Whistleblowing Policy.
- Staff Code of Conduct.
- Mental Health and Wellbeing Strategy.
- Preventing Extremism and Radicalisation Protocol.
- GDPR and Data Protection Policy.

These documents work together to ensure a comprehensive safeguarding framework is in place at My Oasis.

Indicators of Exploitation

Signs of CSE

- A young person having an older boyfriend or girlfriend.
- Secretive about relationships or online activity

- Unexplained acquisition of money, gifts, or new possessions.
- Regularly going missing or returning home late.
- Suffering from sexually transmitted infections or becoming pregnant.
- Inappropriate sexualised behaviour or language.
- Involvement in sexual activity that seems beyond their level of maturity.
- Changes in emotional well-being or disengagement from school.

Signs of CCE

- Regularly missing from school or education.
- Going missing from home or care.
- Sudden possession of unexplained money, gifts, or expensive items.
- Association with peers or adults involved in criminal activity.
- Behavioural changes: aggression, anxiety, withdrawal.
- Drug or alcohol misuse.
- Carrying weapons or items that could be used as weapons.
- Fearful or controlled behaviour.
- Disengagement from positive activities or support.

Signs of County Lines Exploitation

- Possession of multiple mobile phones or “burner” phones.
- Unexplained travel outside local area.
- Being picked up or dropped off by unknown adults.
- Staying out overnight or returning home exhausted/distressed.
- Knowledge of drug-related, gang, or postcode language.
- Transporting items, undertaking tasks or errands for others.
- Carrying drugs, large sums of money, or weapons.
- Signs of intimidation, threats, debt, or fear of repercussions.
- Accommodation concerns, including staying in unknown addresses (“cuckooing”).

Not all young people experiencing exploitation will display these indicators. Indicators in isolation do not confirm exploitation but should always prompt professional curiosity and discussion with the DSL.

Roles and Responsibilities

All Staff

- Must remain vigilant to the signs of exploitation.
- Have a duty to report any concerns or suspicions to the Designated Safeguarding Lead (DSL) immediately.

Designated Safeguarding Lead (DSL)

Will assess and act upon concerns, including making referrals to:

- Children's social care.
- The Police.
- Other safeguarding partners, where appropriate.
- Will ensure that accurate and secure records are maintained.

Headteacher

- Holds strategic accountability for the implementation of this policy.
- Supports the DSL and ensures staff receive training related to CSE, CCE, and County Lines exploitation.

Response to Concerns

Any member of staff who suspects or becomes aware that a young person may be at risk of or is experiencing exploitation must:

- Immediately report the concern to the DSL.
- Refrain from conducting their own investigation.

The DSL will:

- Take appropriate action in line with local safeguarding procedures.
- Liaise with children's social care and the police where exploitation is suspected.
- Record the concern and outcomes in a secure and confidential manner.
- Ensure the young person receives appropriate support and protection.

Monitoring and Review

- The DSL will monitor patterns of attendance, behaviour, well-being, and safeguarding concerns related to CSE, CCE, and County Lines exploitation.

- Records of concerns, referrals, and interventions will be reviewed regularly to ensure the safety and protection of young people.
- The DSL will update risk assessments and individual support plans as circumstances change.
- Senior leaders will review this policy at least annually, or sooner if there are updates to legislation, guidance, or local safeguarding procedures.
- Staff will be informed of any changes to the policy and provided with refresher training where needed.