



**The
Sunnywood
Project**

Child Sexual Exploitation Policy

For Directors, Staff, and Volunteers working with young people and children

Effective: 25/08/2024

Review: 25/08/2025

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Statement of intent

The Sunnywood Project (TSP) strives to ensure the safety and wellbeing of all children and young people involved in its projects, events, or activities. To effectively achieve this, staff members and volunteers must safeguard and protect children against child sexual exploitation (CSE).

This policy outlines the organisation's procedures for preventing, managing, and reporting cases of CSE.

The responsibilities of staff members and volunteers in relation to safeguarding and protecting children are outlined, including those in relation to the Directors, DSL, and the Board of Trustees.

To effectively implement this policy and ensure the necessary control measures are in place, the parents and carers of children and young people involved in TSP projects, events, or activities are responsible for working alongside TSP to identify concerns and potential risks, in order 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)
- Data Protection Act 2018
- DfE (2023) 'Working Together to Safeguard Children'
- DfE (2024) 'Keeping children safe in education 2024'
- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2024) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'

This policy operates in conjunction with the following TSP policies:

- Child Protection and Safeguarding Policy
- Health and Safety Policy
- Data Protection Policy
- Equality, Equity, Diversity and Inclusion Policy
- Anti-bullying Policy
- Staff and Volunteer Code of Conduct

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 and volunteers** will recognise that CSE:

- Can affect anyone under the age of 18, including 16- and 17-year-olds who can legally consent to having sex – some children may not realise they are being exploited (e.g. they believe they are in a genuine romantic relationship).
- Can take place in person, through the use of 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 enticement, 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 adults of any gender, 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*.

3. Roles and Responsibilities

The **Board of Trustees** has a duty to:

- Advise on policies, procedures and training opportunities in the organisation relating to CSE to ensure they are effective and compliant.

The **Directors** has a duty to:

- Ensure that the organisation complies with its safeguarding and child protection duties.
- Guarantee that the policies, procedures and training opportunities in the organisation relating to CSE are effective and compliant.
- Safeguard children and young people's wellbeing and maintain public trust in the organisation.
- Ensure that the policies and procedures, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members and volunteers.
- 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 and volunteers receive safeguarding training updates, including that in relation to CSE, on an appropriately regular basis.

Other **staff members**, and **volunteers working directly with children or young people**, have a responsibility to:

- Follow the procedures outlined in this policy and other policies relating to safeguarding and child protection.
- Understand and recognise the signs of CSE.

4. Staff Training

All staff members and volunteers working or otherwise coming into contact with children or young people through TSP activities will undergo training in line with the *Child Protection and Safeguarding Policy*.

When planning training, the DSL and Directors will take the context of the areas in which activities are taking place into consideration, ascertaining whether there are specific issues relating to CSE which need to be addressed as a priority.

During the training of relevant staff and volunteers, the following issues will be addressed:

- Warning signs and indicators of CSE
- The different forms of CSE
- Children and young people most at risk of CSE
- Protecting and supporting children and young people
- Procedures for reporting suspected cases of CSE
- Information sharing protocols
- Facilitating conversations with children and young people, as well as parents/carers about CSE

Staff members and volunteers working directly with CYP 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 and volunteers will be aware of the children most at risk of being sexually exploited, including vulnerable individuals, children who are at risk of school exclusion or may have already been excluded, and children with SEND.

All staff members and volunteers 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
- Staying out late regularly or going missing for periods of time
- Consuming alcohol or drugs
- Acting hostile or aggressive
- Associating with gangs
- 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
- Acting in a defensive manner
- 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 or becoming pregnant
- Trying to conceal marks or scars on their body
- Entering or leaving vehicles driven by unknown adults
- Having a lack of positive relationships
- Using the internet and social media in a manner which causes concern
- Associating with other young people involved in exploitation
- Misuse of drugs and/or alcohol

6. Effects of CSE

CSE can have long-lasting effects on a child and TSP is committed to early identification to reduce these effects.

All staff members will be made aware of the effects and signs of CSE 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
- Employment prospects
- 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

TSP will ensure that staff and volunteers 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 does not include the sharing of sexual photos and videos of those under the age of 18 with or by adults. This is a form of child sexual abuse and must be referred to the police.

Sending and receiving sexually explicit messages or images is a serious offence and is often a primary method utilised by CSE offenders to communicate with victims.

The sharing of nudes and semi-nudes will be handled as a child protection issue in line with the *Child Protection and Safeguarding Policy*.

Where appropriate, children and young people will be made aware that, regardless of age, the police consider the sharing of nudes and semi-nudes amongst people under the age of 18 a criminal offence.

8. Working with parents

TSP will ensure that, where appropriate and necessary, parents/carers of children and young people involved with the organisation's activities:

- Understand the risks of CSE and recognise that the issue is something that could affect their child.
- Understand that CSE can occur both online and offline.
- Know the warning signs of CSE.
- Know how to report any concerns that they may have.
- Know where to go for support if their child has been the victim, or is the suspected victim, of CSE.
- Are reassured that a range of services will, as appropriate, work with them to try to protect their child.
- Know where to access support to manage the emotional impact of CSE on their child and themselves.
- Know where to access support that is tailored to their specific circumstances, e.g. support that recognises culture or faith.

Where necessary, parents/carers will be provided with the contact information of relevant services and outside agencies.

Where necessary, parents/carers will be made aware of whom to report concerns to within the TSP via information posted on the website.

Parents/carers' concerns will always be listened to and taken seriously.

9. Reporting and referrals

If a member of staff or volunteer has any concern about a child's welfare, or suspects that a child is at risk of, or has been the victim of CSE, they will act on them immediately by speaking to a DSL.

All staff members and volunteers 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 or volunteers have concerns about CSE or an allegation is made about another member of staff, this should be reported to the Directors. If there is a conflict of interest in reporting the matter to the Directors, it should be reported directly to the LA designated officers (LADOs).

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

If a child 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, to ensure the wellbeing of the children involved.

The DSL will work closely with the police to ensure the organisation does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a child 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.

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

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

Where CSCS decide that a statutory investigation is not appropriate and TSP agrees with this decision, the organisation will consider signposting for additional support.

At all stages of the reporting and referral process, the child will be informed of the decisions made, actions taken and reasons for doing so. The organisation will ensure that the child's wishes are always considered, and that there are systems available for children to provide feedback and express their views.

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

10. Providing support

Staff members, and volunteers who come into contact with children and young people, will undergo safeguarding training followed by annual updates so that they can fully understand the needs of a child that has experienced CSE and provide effective support.

Staff members and volunteers will build trusting relationships with children and young people which reinforce positive relationships.

Children and young people will be reassured that they can talk to staff members and volunteers if they feel unsafe.

A listening culture within the organisation will be actively promoted by all staff members.

The DSL and Directors, as well as any other appropriately trained staff members will provide children with advice on where and how to obtain confidential advice, counselling and treatment, as well as advice on emergency contraception and its effectiveness.

11. Monitoring and review

This policy is reviewed **annually** by the DSL and the Directors.

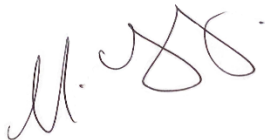
Any changes made to this policy by the Directors and DSL will be communicated to all members of staff, volunteers, and the parents/carers of children and young people engaged in already-running TSP activities.

All members of staff, and volunteers who come into contact with children or young people, are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

The effectiveness of this policy will be monitored and evaluated by all members of staff. Any concerns will be reported to the Directors immediately.

The next scheduled review date for this policy is **25/08/2025**.

Signatory: Marc Young, Director of Education and Youth Service



Signatory: Samantha Deas, Creative Director and Family Engagement Coordinator (DSL)



Signatory: Steven Ticehurst, DofE (LO) and Operations Manager (DSL)

