



## Severn Mentoring – Exploitation Policy

*(Community Mentoring & Alternative Provision – September 2025)*

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### 1. Policy Statement

At **Severn Mentoring**, we are committed to protecting all children and young people from exploitation in any form.

We recognise that the young people we support may be particularly vulnerable due to factors such as disrupted education, social isolation, exposure to adverse experiences, or lack of trusted adults.

We believe that early identification, education, and robust safeguarding practice are key to preventing exploitation and supporting recovery for those affected.

Exploitation can take many forms, including **Child Sexual Exploitation (CSE)**, **Child Criminal Exploitation (CCE)** and **County Lines activity**.

Regardless of type, all involve an imbalance of power where a child or young person is coerced, manipulated, or deceived into taking part in exploitative situations, often under threat, fear, or deception.

This policy sets out Severn Mentoring's commitment to **prevention, identification, and intervention**, ensuring all staff understand their responsibilities and how to act swiftly to protect young people at risk.

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### 2. Purpose

This policy aims to:

- Protect young people from all forms of exploitation.
- Raise staff awareness of the signs, indicators, and impact of exploitation.
- Embed preventative approaches through mentoring, education, and partnership work.
- Establish a clear escalation and reporting procedure consistent with our **Safeguarding and Child Protection Policy**.

This policy applies to all staff, mentors, tutors, volunteers, and contractors working with Severn Mentoring across Gloucestershire, Herefordshire and Monmouthshire.

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### **3. Prevention, Awareness and Training**

#### **3.1 Prevention**

Severn Mentoring prioritises prevention through:

- **Building trusting relationships** between mentors and young people to create safe spaces for disclosure.
- **Educating learners** about healthy relationships, online safety, and personal boundaries.
- **Identifying risk factors early**, including missing episodes, association with risky peers, or changes in behaviour.
- **Collaborating** with local safeguarding partners, schools, and local authorities to share information and reduce risk.
- **Using risk assessments** for every mentoring and tuition activity, identifying any known or potential exploitation risks.

#### **3.2 Awareness Raising**

All staff and learners are supported to understand exploitation through:

- Visual and verbal **awareness campaigns**, posters, and conversations around safety and control.
- Discussion of real-world scenarios (in age-appropriate language) to help young people recognise manipulation and coercion.
- Promoting online safety and responsible digital behaviour.
- Engaging with community partners and local police to strengthen awareness initiatives.

#### **3.3 Staff Training**

- All staff receive **safeguarding and exploitation awareness training** as part of their induction.
- Annual **refresher training** includes recognising signs of exploitation, contextual safeguarding, and referral procedures.
- Additional training is provided on **County Lines awareness, trauma-informed practice, and managing disclosures**.
- The Designated Safeguarding Lead (DSL) ensures training aligns with current legislation and local authority procedures.

Training outcomes are recorded centrally and monitored by the Severn Mentoring Senior Management Team.

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#### **4. Understanding Exploitation**

Exploitation can affect any young person, regardless of gender, background, or location. Below are the primary forms of exploitation recognised by Severn Mentoring.

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##### **4.1 Child Sexual Exploitation (CSE)**

###### **Definition:**

Child Sexual Exploitation is a form of child abuse in which a young person is manipulated, deceived, coerced, or forced into sexual activity in exchange for something they need or want (e.g., affection, attention, money, drugs, alcohol, accommodation, or status).

###### **Key indicators include:**

- Unexplained gifts, money or new possessions.
- Changes in mood or behaviour, especially withdrawal or anxiety.
- Older friendships or relationships with controlling individuals.
- Unexplained absences or frequent missing episodes.
- Sexualised behaviour or language.
- Signs of physical injury or emotional distress.
- Sudden decline in attendance or engagement.

CSE can occur online, through grooming, or in person.

Victims may not recognise their situation as abuse due to fear, dependency, or manipulation.

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##### **4.2 Child Criminal Exploitation (CCE)**

**Definition:**

Child Criminal Exploitation occurs when a child or young person is manipulated or coerced into committing crimes for the benefit of another individual or group. This may involve theft, drug distribution, weapons carrying, fraud, or other criminal activity.

**Key indicators include:**

- Unexplained money, goods or mobile phones.
- Association with known offenders or gangs.
- Fearful, secretive, or defensive behaviour.
- Carrying weapons or large quantities of drugs/cash.
- Going missing or being found out of area.
- Reluctance to engage with professionals.
- Sudden changes in friendship groups or appearance.

CCE can occur alongside CSE, with children facing multiple and overlapping risks.

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### **4.3 County Lines Exploitation**

**Definition:**

County Lines refers to organised criminal networks exploiting young people to transport or sell drugs across counties.

Children are often used because they are less likely to be stopped by authorities and more easily controlled.

**Key indicators include:**

- Regular missing episodes or being found far from home.
- Frequent travel to different towns or counties.
- Possession of train tickets, taxis, or hotel receipts without reason.
- Drug paraphernalia or signs of substance use.
- Being in debt or under pressure to repay money.
- Fear of police or refusal to explain movements.

The exploitation may involve “**cuckooing**” (where adults take over a child’s or vulnerable person’s home to run criminal activity) or threats to family members.

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## **5. Recognising and Responding to Concerns**

Staff must remain alert to any signs or disclosures that may indicate exploitation. Early reporting and intervention are critical.

**When staff suspect exploitation:**

1. **Listen carefully and reassure the young person** — do not make promises of confidentiality.
  2. **Record the concern** immediately using the Severn Mentoring Safeguarding Concern Form.
  3. **Report** the concern directly to the **Designated Safeguarding Lead (DSL)** without delay.
  4. If a young person is in **immediate danger**, contact the **Police (999)** and then inform the DSL.
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## 6. Escalation Strategy

### 6.1 Internal Escalation

- All exploitation concerns are reported immediately to the **DSL or Deputy DSL**.
- The DSL will assess the information using Severn Mentoring's safeguarding procedures and decide whether to escalate to external agencies.
- A written record is made in the secure safeguarding system, including the decision rationale.

### 6.2 External Escalation

Where exploitation is suspected or confirmed:

- The DSL will make a **referral to the relevant Local Authority Children's Services** via the Multi-Agency Safeguarding Hub (MASH).
- If a crime is suspected, the **Police (via 101 or 999)** will be contacted immediately.
- The DSL will liaise with:
  - **Local Authority Designated Officer (LADO)** (if staff behaviour is implicated).
  - **Parents or carers**, where safe and appropriate.
  - **Schools, social workers or youth justice services**, where the young person is known to those partners.
- All actions and outcomes will be logged and reviewed by the Severn Mentoring Senior Management Team.

### 6.3 Linking with the Safeguarding Policy

This policy operates as part of Severn Mentoring's broader **Safeguarding and Child Protection Policy**, which outlines:

- The roles of the DSL and Deputy DSL.
- How to make internal and external referrals.
- Record-keeping and confidentiality expectations.
- Procedures for responding to allegations against staff.

All escalation decisions must follow those safeguarding protocols in full.

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## 7. Post-Incident Support and Review

If exploitation is confirmed or suspected:

- The DSL will coordinate **support for the young person**, which may include referral to specialist services (e.g., youth exploitation teams, counselling, trauma support).
- **Mentoring sessions** will be reviewed to ensure they remain safe, appropriate and risk-assessed.
- A **strategy meeting** may be convened with police, local authority, and partner agencies.
- Severn Mentoring will conduct an **internal review** to identify any learning, update risk assessments, and strengthen practice.

Where the incident involved staff or organisational processes, a full **safeguarding investigation** will take place in line with the Safer Recruitment and Whistleblowing Policies.

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## 8. Confidentiality and Data Protection

All exploitation concerns and records are:

- Stored securely in accordance with the *Data Protection Act 2018* and *UK GDPR*.
  - Shared only on a need-to-know basis with safeguarding partners.
  - Retained for the appropriate safeguarding record period.
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## 9. Monitoring and Review

This policy is reviewed **annually** or following significant updates to national or local guidance.

Findings from internal reviews or external case outcomes will inform updates.

The DSL is responsible for ensuring all staff are briefed on any changes.

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## 10. Related Policies

- **Safeguarding and Child Protection Policy**
- **Safer Recruitment Policy**
- **Whistleblowing Policy**
- **Lone Working Policy**
- **Missing Persons Policy**
- **Code of Conduct**

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## **11. Policy Ownership**

**Policy Lead:** Designated Safeguarding Lead (DSL) – Rich Kear

**Deputy DSL:** Jack Fowler and Josh Carter

**Approved by:** Severn Mentoring Senior Management Team

**Review Date:** 01/09/2025

**Next Review Due:** 01/09/2026

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### **Summary Table**

<b>Area</b>	<b>Key Commitment</b>
<b>Prevention</b>	Early risk assessment, education, strong mentoring relationships.
<b>Awareness &amp; Training</b>	All staff trained annually on exploitation and county lines.
<b>Internal Escalation</b>	Immediate reporting to DSL and management.
<b>External Escalation</b>	Police, MASH and LADO contacted as per Safeguarding Policy.
<b>Post-Incident</b>	Full review, partner engagement, learner and staff support.