



**Bath and North East Somerset Local Safeguarding
Adult Board (LSAB)
Adult Exploitation Statement**

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INTRODUCTION

The exploitation of adults has been identified throughout the UK, in both rural and urban areas, and in all parts of the world. It damages the lives of individuals, their families and carers. Adult exploitation is completely unacceptable and we are determined to do all we can to help eradicate it. Adults with care and support needs are more vulnerable to exploitation and should therefore be safeguarded.

The purpose of this Statement is to raise awareness of Adult Exploitation and to ensure that all these areas of concern relating to exploitation are joined up in a multi-agency approach and link to both the LSAB Strategic Plan and the LSAB Prevention Strategy.

What is adult exploitation?

Exploitation encompasses both controlling and coercive behaviours.

‘Controlling behaviour’ is a range of acts designed to make a person subordinate and/ or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

‘Coercive behaviour’ is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.’ (Home Office, 2013)

This definition includes so-called ‘honour’ based violence, female genital mutilation (FGM) and forced marriage, domestic abuse, grooming, sexual exploitation, ‘mate crime’, trafficking and modern slavery, radicalisation and scamming. Victims are not confined to any age, gender or ethnic group.

Care Act 2014 safeguarding statutory duties placed upon Local Authorities apply to anyone over 18 including those who are still receiving services from children’s services

Robust partnership working and a programme of service and practice developments are central to achieving improved safeguarding responses and outcomes for adults at risk of, or experiencing exploitation.

B&NES Local Safeguarding Adult Board (LSAB)

As a multi-agency Board we have a responsibility to coordinate and monitor the work of agencies in Bath and North East Somerset to safeguard and promote the welfare of adults with care and support needs.

We aim to ensure that people’s rights are respected in the process of them being offered help and protection.

We work to raise awareness within the wider community, including statutory, voluntary and independent agencies, about how everybody can contribute to safeguarding and promotion of welfare.

The B&NES LSAB provides the following statement in respect of our commitment to, and efforts in, preventing adult exploitation behaviours and activity. We will work with our partner agencies to ensure this commitment is met.

Our commitment to prevent adult exploitation

B&NES LSAB believes there is no room in our society for adult exploitation. We have zero tolerance for breaches in human rights. We and our partners are committed to ensuring there is no adult exploitation in any part of our business, operational activities and local communities.

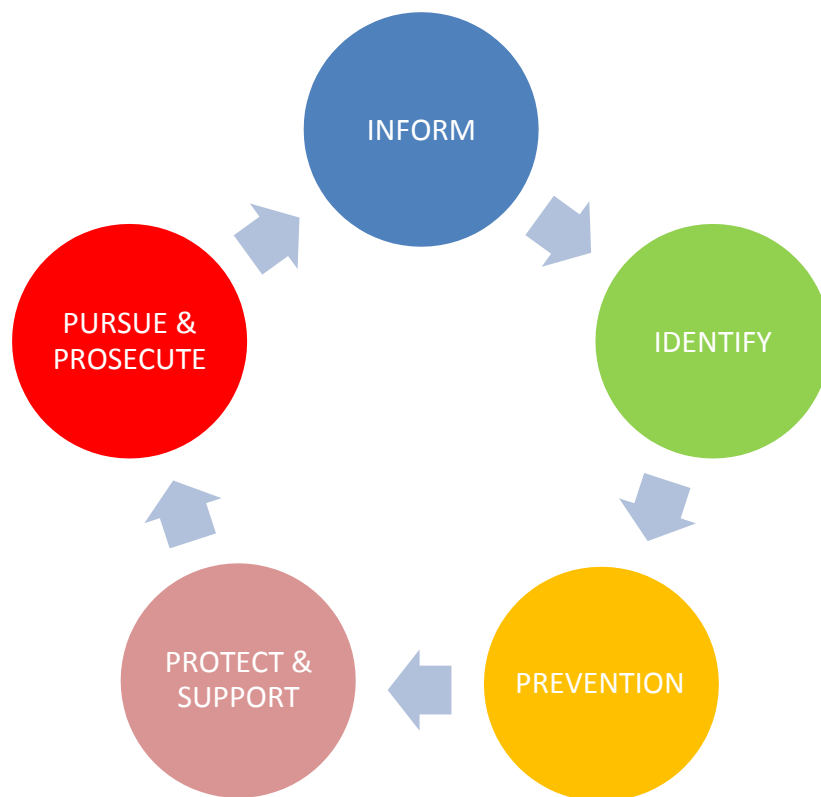
Our approach

Our overall approach will be governed by compliance with legislative and regulatory requirements. We will:

- Seek assurance from partner agencies that they ensure a robust approach in order to comply with legislative and regulatory requirements.
- Require partner agencies to provide assurance that they comply with LSAB Multi agency Policy and Procedures.
- Seek to raise awareness of the issue of adult exploitation within the work of the Board, partner agencies and with our local communities.

Our five key steps are as follows:

- 1. Inform** – to ensure that identifying and stopping exploitation is everybody's business.
- 2. Identify** – to identify those at risk of or experiencing exploitation and those who exploit.
- 3. Prevention** – to prevent Adults at Risk from being at risk of or experiencing exploitation.
- 4. Protect & Support** – to safeguard and support all those identified as being at risk of or experiencing exploitation.
- 5. Pursue & Prosecute** – to investigate, disrupt and prosecute perpetrators of exploitation.



Underpinning the five key steps are the following aspirations:

- > To engage adults, their families and carers in the development and review of services.
- > To maintain up to date policies, procedures and guidance consistent with regional initiatives and national guidance for the LSAB and all partner agencies.
- > To develop an integrated approach to and understanding of the related issues of adults who are at risk of exploitation.

Inform

To empower and protect adults, their families and carers from being at risk of or experiencing exploitation by increasing understanding and awareness of the nature and impact of exploitation within the whole community.

Partners will achieve this by:

- Information sharing with and by our partner agencies.
- Raising awareness within day-to-day practice delivery across the LSAB partners amongst adults, their families/carers, professionals and communities to help them identify the signs of adult exploitation and know what they should do and where to get help.
- External facing campaigns to raise awareness of adult exploitation and routes for disclosing.
- Raising awareness amongst professionals of the processes for tackling adult exploitation within their organisations and where to go for support and advice.
- Continuing to deliver awareness raising and understanding as part of a tiered training programme to all relevant practitioners and partner agencies.
- Development of a plan for engaging the night time and business economies in adult exploitation awareness training and safeguarding.
- Improve accessibility of information and resources on external facing LSAB safeguarding website and social media.
- Ensuring that professionals have access to training in relation to and an appropriate understanding of the risks and challenges presented by social media.
- Learning lessons from previous and current prosecutions through multi-agency reviews, including SARS and consideration of national learning.

Identify

To share relevant information regarding early indicators, emerging issues and models of targeting and exploiting adults, and shape services appropriate to their needs.

Partners will achieve this by:

- Reviewing the effectiveness of the existing approaches for sharing information and identifying those at risk.
- Working with Avon and Somerset Constabulary to improve external agencies knowledge of information and intelligence sharing pathways.
- Promoting the LSAB protocol [Multi Agency Information Sharing Protocol](#) (March 2017) to improve the identification of trends, hotspots, adults at risk and perpetrators amongst all partners.
- Sharing appropriate information across both children's and adults safeguarding.
- Keeping up to date with new developments in technology and social media and disseminating learning to the wider workforce.

Prevention

To prevent Adults at Risk from experiencing or continuing to experience exploitation

Partners will achieve this by:

- Linking work with the LSAB Prevention Strategy [LSAB Multi Agency Prevention Strategy](#) (June 2017)
- Awareness raising with harder to reach groups of people in the community.
- Linking with services working with young adults and Adults at Risk to promote awareness of adult exploitation and understand their duty to support young adults and Adults at Risk.
- Promoting more robust signposting of Adults at Risk and their families/carers to early help, information and advice services, including supporting self-reporting and consideration of mental capacity.
- Improving knowledge of adult services through promotion of the Survivor Pathway and signposting Sexual Violence websites on social media and LSAB partners' literature and websites.
- Working with the B&NES Licensing and the Responsible Authorities Group (RAG) to raise awareness of adult exploitation and safeguarding within business and operational activities.
- Working with the Avon and Somerset Constabulary Management to improve information pathways and communication between statutory services about identified individuals at risk of perpetrating sexual exploitation
- Improving data capture.
- Referring to Multi-agency Public Protection arrangement (MAPPA) where appropriate for convicted perpetrators to enable resources to be directed to pursuing, disrupting and addressing risk management as well as targeting responses.
- Manage the risk posed by convicted perpetrators in the community and custody through MAPPA and other arrangements.
- Involve Local Policing Area teams in safety and response plans.
- Review the online activity of those at risk to help prevent and disrupt online exploitation.

Protect & Support

To work together to safeguard current adults at risk of adult exploitation to minimise harm, reduce opportunities for perpetrators to target adults at risk and to provide appropriate support, intervention, information and recovery services to Adults at Risk.

Partners will achieve this by:

- Using feedback and information received from adults, their families/carers and others to inform the development of practice, strategic plans and service delivery.
- Ensuring that relevant policies and guidance are up-to-date and readily available on the LSAB website.
- Developing evidence-based practitioner tools to improve safety planning and intervention strategies.
- Working with partner agencies including the Constabulary to develop cross border pathways to divert victims of Adult Sexual Exploitation away from the Criminal Justice System for offences committed due to their experiences of being victims of sexual exploitation.
- Promoting a workforce that values the voices and experiences of Adults at Risk, their families and carers and includes them in decision-making.
- Promoting enhanced health, wellbeing and care for all adults who have been exploited.
- Referring adults at risk into the UKHTC National Referral Mechanism where there are indicators they may have been victims of trafficking.
- Ensuring that Care Leavers and those young people transitioning into adulthood have access to appropriate support services.
- Ensuring that families and carers are offered appropriate support, including access to carers' assessments.
- Providing appropriate support in cases where historical disclosures of adult exploitation are made.
- Working with partners from across the five local authorities which make up Avon and Somerset, and the wider South West regional partnerships to combat adult exploitation across borders, share good practice, and consolidate learning.

Pursue & Prosecute

To support the police to successfully prosecute those who perpetrate or facilitate the exploitation of Adults at Risk, and to disrupt activities and locations so as to prevent further incidents of adult exploitation.

This will be achieved by:

- Ensuring all partners know how to report crimes of known or suspected adult exploitation when they are not being reported to the police directly by victims.
- Ensuring all partners exchange information to facilitate 'intelligence led policing'.
- Report concerns about potential exploitation to the police <https://www.avonandsomerset.police.uk/exploitation>
- Making best use of missing person's notices, harbourers warnings, civil orders and other appropriate legislation, civil powers and litigation.
- Ensuring that all adults, carers and professionals who have been victims of or witness to adult exploitation receive comprehensive support in preparing for all stages of the Criminal Justice and court processes including after-care support.
- Supporting practitioners, Adults at Risk and carers to gather information, intelligence and evidence appropriately (including online), in order to better assist police action.
- All agencies to work in partnership to support a robust response from the Criminal Justice System.

What can you do?

- Familiarise yourself with the actions listed above to see what you can do.
- Raise awareness of adult exploitation within your organisation
- Talk to colleagues, friends, family, people in your clubs/groups etc and members of the public to raise awareness.
- Refer to links below for further information and guidance
- Report your concerns to the police:

Online Exploitation Form Avon & Somerset Constabulary has launched a new form on their website for anyone who believes a child or adult is vulnerable or being exploited. Reporting will help to tackle crimes involving vulnerable people including modern slavery, child sexual, criminal exploitation and county lines. If you've witnessed something that could be relevant to exploitation do not ignore it, report it. Intelligence submitted via this form could include a variety of points such as; information about a concerning incident, suspicious activity, an unusual exchange between two or more people or something that makes you feel uncomfortable. Intelligence can help the police to build a vital picture about exploitation, an ongoing incident, identifying victims and offenders. This contributes to helping keep potential victims safe and bringing offenders to justice. This is **not** a referral form or early help notification form and does not replace any pre-existing referral or notification mechanism including referrals to the Lighthouse Safeguarding Unit (LSU) or social care. Always call 999 if there is an emergency, a crime is in progress, someone suspected of a crime is nearby, when there is danger to life or when violence is being used or threatened.

Also information can be found on the force web pages via these links:

[Child Sexual Exploitation \(CSE\)](#)

[Modern Slavery](#)

Short link to the form <https://www.avonandsomerset.police.uk/exploitation>

Appendix 1

Links and useful information:

The aim of this multi-agency statement is to raise awareness of the issue of Adult Exploitation. The information provided below is to give all practitioners and interested parties access to some of the wealth of further information that is available that covers: types of exploitation; local and national guidance; B&NES LSAB policies already in existence that relate to specific types of exploitation; and to encourage us all to adopt a multi-agency approach.

Definition of Exploitation

Definition of exploitation (from Modern Slavery Act 2015)

- (1) For the purposes of section 2 a person is exploited only if one or more of the following subsections apply in relation to the person.

Slavery, servitude and forced or compulsory labour

(2) The person is the victim of behaviour:

- (a) which involves the commission of an offence under section 1, or
(b) which would involve the commission of an offence under that section if it took place in England and Wales.

Sexual exploitation

(3) Something is done to or in respect of the person:

(a) which involves the commission of an offence under:

- (i) section 1(1)(a) of the Protection of Children Act 1978 (indecent photographs of children), or
(ii) Part 1 of the Sexual Offences Act 2003 (sexual offences), as it has effect in England and Wales, or
(b) which would involve the commission of such an offence if it were done in England and Wales.

Removal of organs etc

(4) The person is encouraged, required or expected to do anything:

- (a) which involves the commission, by him or her or another person, of an offence under section 32 or 33 of the Human Tissue Act 2004 (prohibition of commercial dealings in organs and restrictions on use of live donors) as it has effect in England and Wales, or
(b) which would involve the commission of such an offence, by him or her or another person, if it were done in England and Wales.

Securing services etc by force, threats or deception

(5) The person is subjected to force, threats or deception designed to induce him or her:

- (a) to provide services of any kind,
(b) to provide another person with benefits of any kind, or
(c) to enable another person to acquire benefits of any kind.

Securing services etc from children and vulnerable persons

(6) Another person uses or attempts to use the person for a purpose within paragraph (a), (b) or (c) of subsection (5), having chosen him or her for that purpose on the grounds that:

- (a) he or she is a child, is mentally or physically ill or disabled, or has a family relationship with a particular person, and

(b) an adult, or a person without the illness, disability, or family relationship, would be likely to refuse to be used for that purpose.

Types of Exploitation

a) Modern slavery and trafficking

The Centre for Social Justice Report (2013) further states that the term 'modern slavery' includes the definitions below:

HUMAN TRAFFICKING

1. Recruitment, transportation, transfer, harbouring or receipt of persons.
2. By means of threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person; (where a child is involved, the above means are irrelevant).
3. For the purposes of exploitation, which includes (but is not exhaustive):
 - Prostitution
 - Other sexual exploitation
 - Forced labour
 - Slavery (or similar)
 - Servitude etc.
 - Removal of organs

SLAVERY

The status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised (129 Convention; approved in defining Art 4 ECHR: *Siladin v France* (ECHR, 2005).

SERVITUDE

An obligation to provide one's services that is imposed by the use of coercion, and is to be linked with the concept of 'slavery' described above (*Siladin v France*, ECHR (2005).

FORCED LABOUR

All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

Below are links to national and international definitions of slavery and trafficking:

[Modern Slavery Act](#) [Palermo Protocol](#) [EU Directive](#) [UNODC](#)

If you identify a potential victim they can be referred to the National Referral Mechanism to be formally identified as a victim of modern slavery and offered Government-funded support. Referral for potential adult victims is by consent. Government-funded support is provided through a range of specialist providers across the UK. There is also Modern Slavery Helpline on 0800 0121 700. Also, in England and Wales if an adult victim indicates they require support or safe accommodation please contact the Salvation Army's 24 hour referral line on 0300 303 8151

[LSCB & LSAB Modern Slavery Act 2015 Statement](#)

Together with the Anti-Slavery London Working Group, the Human Trafficking Foundation has produced a protocol for Local Authorities containing several resources to help improve their response to human trafficking and modern slavery, in particular the identification and support offered to adult survivors.

[Definitions and Indicators](#): how to identify a victim of human trafficking or modern slavery

[Statutory Duties and Powers](#): The NRM and a Local Authority's statutory duties to identify and support victims of human trafficking and modern slavery

National posters to display:

[Modern Slavery - Exploitation](#)

[Modern Slavery - Offenders](#)

[Modern Slavery - Victims](#)

[Poster LEA](#)

[Poster Non - LEA](#)

[Poster Non - UK](#)

Trafficking

Avon and Somerset Police website:

<https://www.avonandsomerset.police.uk/newsroom/features/human-trafficking-do-you-know-the-signs/>

The Unseen website has a host of resources on it for frontline professionals:

<https://www.unseenuk.org/learn-more/frontline-professionals/resources>

<https://www.unseenuk.org/about/the-problem/modern-slavery>

Anti-slavery Partnership website has information on government factsheets, referral pathways, info on how to spot the signs and forms to download, including the national duty to notify form and an internal assessment form for organisations to assess their internal policies around slavery

<https://atpartnership.sitecrayon.com/files/20140930132040201.pdf>

Bristol information for migrants leaflet <http://www.aspartnership.org.uk/bristol-information-for-victims>

Avon and Somerset Police website:

<https://www.avonandsomerset.police.uk/advice/threats,-assault-and-hate-crime/modern-slavery/>

b) County Lines

'County Lines' and 'Cuckooing' are fairly recent phenomena which have spread throughout the country. Tackling these issues requires collaboration between the police, safeguarding professionals, local authorities and wider partners. This article aims to explain a little about 'County Lines' and its implications.

What is a county line?

- Young and vulnerable people living in our communities are being exploited by drugs gangs. It's happening right now. And we need your help to protect them.

- County lines gangs based in cities like London are targeting the most vulnerable people in small towns across the country to sell class A drugs on their behalf.
- These people are exploited and threatened with violence. This type of behaviour is a significant threat to our communities and will not be tolerated. But we need your help to spot the signs and act on your concerns. Your voice will be heard and will make a difference.

What does county lines mean?

- County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas in the UK, using dedicated mobile phone lines or other form of 'deal line'.
- They are likely to exploit young people and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence and weapons.
- The gangs are based in cities throughout the UK and are targeting the most vulnerable people in small satellite towns across the country to sell class A drugs on their behalf and to act as 'runners'.

What are we doing to tackle county lines?

- Operation Tarak is the South West region's response to tackling county lines criminality.
- The campaign aims to protect the most vulnerable in society, whether that is adults or children, from the exploitation of drugs gangs.
- The police work closely with partner agencies to identify those at risk, identify the perpetrators, disrupt the enterprises and bring offenders to justice.

What can you do to help?

- We need you to help tackle County Lines criminality by spotting the signs and reporting drug dealing or exploitation of a vulnerable person.
- Many people would not recognise the signs of drug dealing in their area. By raising awareness, we hope more people will feel comfortable in reporting information to the police. Your call could save lives.

Potential signs of Exploitation

- Have you noticed a change in their behaviour?
- Have they been going missing from work or home?
- Are they meeting with unfamiliar adults?
- Are they using drugs and alcohol?
- Has there been a breakdown in relationships with family and friends?

This could be a sign that they are being coerced and controlled to commit crime and their safeguarding needs to be explored.

Cuckooing

Drug dealers will often take over the homes of vulnerable people as they use it as a base to deal drugs in the area. The vulnerable person may be being kept inside against their will.

- Have you noticed more people calling at an address? Sometimes at unsociable hours?
- Have you noticed a neighbour has not been seen for a while?
- Are there suspicious smells coming from an address?
- Are there suspicious or unfamiliar vehicles outside the address?

Cuckooing could be taking place. Look out for your neighbours and report suspicions to 101.

[LSAB and LSCB Exploitation and County Lines Briefing](#) (January 2019)

This Exploitation Statement has been formulated with reference to Home Office document [Criminal Exploitation of children and vulnerable adults: County Lines Guidance](#) July 2017 and the National Crime Agency (NCA) document County Lines Violence, Exploitation & Drug Supply Nov 2017.

<http://www.nationalcrimeagency.gov.uk/publications/832-county-lines-violence-exploitation-and-drug-supply-2017/file>

c) Radicalisation

[Prevent](#) page on B&NES Council website

<https://www.safeguarding-bathnes.org.uk/adults/i-work-adults/8-prevent>

d) Sexual exploitation

Sexual exploitation includes many of the issues already covered, such as domestic abuse, modern slavery, rape and assault.

For further local information and support see the Avon & Somerset Constabulary website:

<https://www.avonandsomerset.police.uk/advice/threats,-assault-and-hate-crime/rape-and-sexual-assault/>

e) FGM

Please read:

[LSCB & LSAB Female Genital Mutilation Guidance](#)

It should be noted that FGM, Honour Based Violence and Forced Marriage do not and should not stand alone. They are inexorably linked with domestic abuse and are part of the wider Government strategy to reduce [Violence against Women and Girls](#) (VAWG).

f) So called Honour-based Violence/Forced Marriage

A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In the cases of some adults at risk who lack the capacity to consent, coercion is not required for a marriage to be forced. Forced marriage is not a religious or cultural issue - it is abuse of human rights under the Forced Marriage Act of 2007.

There is a difference between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement still remains with the prospective spouses.

[Statutory Guidance for Multi-Agency Professionals \(2014\)](#)

The Forced Marriage Unit (FMU) is always happy to talk to frontline professionals handling cases of forced marriage at any stage in a case. It can offer further information and advice on the wide range of tools available to tackle forced marriage, including legal remedies, overseas assistance and how to approach victims. FMU staff can also speak at conferences or run training workshops to teams of frontline practitioners, and provide free leaflets and posters.

Call: 020 7008 0151 (**Mon-Fri: 09.00-17.00**)

Email: fmu@fco.gov.uk

Web: www.gov.uk/forced-marriage

Address: Forced Marriage Unit, Foreign & Commonwealth Office, King Charles Street, London, SW1A 2AH

For all out of hours emergencies, please telephone 020 7008 1500 and ask to speak to the Global Response Centre.

[Karma Nirvana](#) is a National Charity that supports both men and women who are victims of Forced Marriage and Honour Based Abuse. It runs a national helpline offering direct support and guidance to victims and professionals. Karma Nirvana provides training to the Police, NHS and Social Services. Karma Nirvana helpline Tel 0800 5999 247 (honour-based abuse & forced marriage support)

g) Domestic Abuse

- In B&NES there is a very active Domestic Abuse Partnership (DAP) which provides a lot of local B&NES Domestic Abuse Information and support - click [here](#)

[Multi Agency Domestic Abuse Statement 2017](#)

[Domestic Abuse Strategy 2018-2021](#)

- [This is not an excuse](#) - local domestic abuse website **Helpline 0800 6949999**

h) Scamming

Please see:

<https://www.safeguarding-bathnes.org.uk/adults/i-work-adults/11-rogue-traders-and-scams>

Acknowledgments:

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