**Safeguarding Individuals Involved in Commercial Sexual Exploitation**

 **Policy and procedure**

**Introduction**

Safeguarding women and men involved in commercial sexual exploitation means protecting an adult’s right to live in safety, free from abuse and neglect. Our safeguarding policy aims to make sure that adults at risk do not get harmed, and knowing what to do if anyone in our organisation is worried about an adult. We aim to:

* Protect adults at risk from harm and abuse;
* Enable staff and volunteers to know what to do if they are worried; and
* Show that our organisation is responsible.

# Safeguarding Adults Policy Statement

This policy will enable Stand Against Sexual Exploitation to demonstrate its commitment to keeping safe adults at risk with whom it works alongside. Stand Against Sexual Exploitation acknowledges its duty to act appropriately to any allegations, reports or suspicions of abuse.

It is important to have policy and procedures in place so that all trustees, staff, volunteers, and service users can work to prevent abuse and know what to do should a concern arise.

The policy and procedures have been drawn up in order to enable Stand Against Sexual Exploitation to:

* promote good practice and work in a way that can prevent harm and abuse occurring;
* ensure that any allegations of abuse or suspicions are dealt with appropriately and the person experiencing abuse is supported; and
* stop abuse occurring.

The policy and procedures relate to the safeguarding of **adults involved in commercial sexual exploitation and who are at risk**. Adults at risk are defined as individuals aged over 18 who:

* have needs for care and support (whether or not the local authority is meeting any of those needs) and;
* is experiencing, or at risk of, abuse or neglect; and
* as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

(Care Act, 2014)

The policy applies to all *trustees*, staff, volunteers, *and* service users and anyone working on behalf of Stand Against Sexual Exploitation.

It is acknowledged that significant numbers of adults at risk are abused and it is important that Stand Against Sexual Exploitation has a safeguarding adults policy and a set of procedures to follow and puts in place preventative measures to try to reduce those numbers.

In order to implement the policy and procedure, Stand Against Sexual Exploitation will work to:

* stop abuse or neglect wherever possible;
* prevent harm and reduce the risk of abuse or neglect to adults with care and support needs;
* promote the wellbeing of the adult(s) at risk in safeguarding adults arrangements;
* safeguard adults in a way that supports them in making choices and having control about how they want to live;
* promote an approach that concentrates on improving life for the adults concerned;
* raise awareness of safeguarding adults to ensure that everyone can play their part in preventing, identifying and responding to abuse and neglect;
* provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or well-being of an adult; and
* address what caused the abuse or neglect.

#### Stand Against Sexual Exploitation will:

* ensure that all trustees, staff, volunteers, and service users are familiar with this policy and associated procedures;
* work within statutory guidance and within the safeguarding policy of any organisation that it collaborates with;
* act within its confidentiality policy and will usually gain permission from service users before sharing information about them with another agency;
* pass information to the Local Authority when more than one person is at risk. For example: if the concern relates to a worker, volunteer or organisation who provides a service to adults with care and support needs or children;
* inform service users that where a person is in danger, a child is at risk or a crime has been committed then a decision may be taken to pass information to another agency without the service user’s consent;
* make a safeguarding adults referral to the Local Authority as appropriate;
* endeavor to keep up to date with national developments relating to preventing abuse and welfare of adults;
* ensure that the Designated Adult Safeguarding Manager (DASM) understands his/her responsibility to refer incidents of adult abuse to the relevant statutory agencies (Police/Local Authority).

The DASM in Stand Against Sexual Exploitation is Helen Johnson.

07984 348 646

HJohnson1102@gmail.com

Helen should be contacted for support and advice on implementing this policy and associated procedures.

This policy and associated procedures are kept in password protected files in online cloud storage.

**Procedures Template**

# Introduction

Stand Against Sexual Exploitation: (a) provides an information and advice service to services providing exiting support to victims of commercial sexual exploitation, their funders and policy makers; (b) provides a networking hub for services providing exiting support to victims of commercial sexual exploitation, their funders and policy makers; and (c) supports victims of commercial sexual exploitation in obtaining and maintaining stable, legitimate employment. The procedures contained in this policy have been designed to ensure the wellbeing and protection of any adult who accesses services provided by Stand Against Sexual Exploitation. These procedures recognise that adult abuse can be a difficult subject for workers to deal with. Stand Against Sexual Exploitation is committed to the belief that the protection of adults at risk from harm and abuse is everybody’s responsibility and the aim of these procedures is to ensure that all trustees, staff, volunteers, and service users act appropriately in response to any concern of adult abuse.

### Preventing abuse

Stand Against Sexual Exploitation is committed to putting in place safeguards and measures to reduce the likelihood of abuse taking place within the services it offers and that all those involved within Stand Against Sexual Exploitation will be treated with respect.

Stand Against Sexual Exploitation is committed to safer recruitment policies and practices for paid staff and volunteers. This may include Disclosure and Barring Service (DBS) checks for staff and volunteers, ensuring references are taken up and provision of adequate training on safeguarding adults.

The organisation will work within the current legal framework for referring staff or volunteers to the DBS who have harmed or pose a risk to vulnerable adults and/or children.

Information about safeguarding adults and the complaints policy will be available to service users and their carers/families.

# Recognising the signs and symptoms of abuse

Stand Against Sexual Exploitation is committed to ensuring that all trustees, staff, and volunteers undertake training to gain a basic awareness of the signs and symptoms of abuse.

Stand Against Sexual Exploitation will not be limited in their view of what constitutes abuse or neglect, as these can take many forms and the circumstances of an individual case will always be considered.

**Abuse includes:**

* **Discriminatory**

Including forms of harassment, bullying, slurs, isolation, neglect, denial of access to services or similar treatment because of race, gender and gender identity, age, disability, religion or because someone is lesbian, gay, bisexual or transgender. This includes racism, sexism, ageism, homophobia or any other form of hate incident or crime.

* **Domestic abuse or violence**

Including an incident or a pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse, by someone who is, or has been, an intimate partner or family member regardless of gender or sexual orientation. This includes psychological/emotional, physical, sexual, financial abuse, so called ‘honour’ based violence, forced marriage or Female Genital Mutilation (FGM).

* **Financial or material**

Including theft, fraud, internet scamming, exploitation, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

* **Modern slavery**

Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

* **Neglect and acts of omission**

Including ignoring medical, emotional or physical care needs, failure to access appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

* **Organisational (sometimes referred to as institutional)**

Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in a person’s own home. This may range from one off incidents to on-going ill treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

* **Physical**

Including assault, hitting, slapping, pushing, burning, misuse of medication, restraint or inappropriate physical sanctions.

* **Psychological (sometimes referred to as emotional)**

Including threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber-bullying, isolation or unreasonable and unjustified withdrawal of services or support networks.

* **Sexual**

Including rape, indecent exposure, sexual assault, sexual acts, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts to which the adult has not consented or was pressured into consenting. It also includes sexual exploitation which is exploitative situations, contexts and relationships where the person receives “something” (e.g. food, accommodation, drugs, alcohol, mobile phones, cigarettes, gifts, money) or perceived friendship/relationship as a result of them performing, and/or another or others performing sexual acts.

* **Self-neglect**

Includes a person neglecting to care for their personal hygiene, health or surroundings or an inability to provide essential food, clothing, shelter or medical care necessary to maintain their physical and mental health, emotional wellbeing and general safety. It includes behaviour such as hoarding.

Abuse may be carried out deliberately or unknowingly. Abuse may be a single act or repeated acts.

People who behave abusively come from all backgrounds and walks of life. They may be doctors, nurses, social workers, advocates, staff members, volunteers or others in a position of trust. They may also be relatives, friends, neighbours or people who use the same services as the person experiencing abuse.

### Designated Named Person for safeguarding adults

Stand Against Sexual Exploitation has an appointed an individual who is responsible for leading safeguarding adults work in the organisation. In their absence, a deputy will be available for managers, staff or volunteers to consult with. The DASM within Stand Against Sexual Exploitation is:

Helen Johnson

07984 348 646

HJohnson1102@gmail.com

**Should this person be unavailable, then the Community Health and Social Care services relevant to the location where the work is being carried out should be contacted directly.**

The roles and responsibilities of the named person are to:

* ensure that all staff and volunteers are aware of what they should do and who they should go to if they have concerns that an adult at risk may be experiencing, or has experienced abuse or neglect;
* ensure that concerns are acted on, clearly recorded and referred to Community Health and Social Care Direct or to the allocated social worker/care manager where necessary;
* follow up any safeguarding adults referrals and ensure the issues have been addressed;
* manage and have oversight over individual complex cases involving allegations against an employee, volunteer, or student, paid or unpaid;
* consider any recommendations from the safeguarding adults process;
* reinforce the utmost need for confidentiality and to ensure that staff and volunteers are adhering to good practice with regard to confidentiality and security. This is because it is around the time that a person starts to challenge abuse that the risks of increasing intensity of abuse are greatest;
* ensure that staff and volunteers working directly with service users who have experienced abuse, or who are experiencing abuse, are well supported and receive appropriate supervision;
* ensure staff and volunteers are given support and afforded protection, if necessary, under the Public Interest Disclosure Act 1998: they will be dealt with in a fair and equitable manner and they will be kept informed of any action that has been taken and its outcome.
1. **Responding to people who have experienced or are experiencing abuse**

Stand Against Sexual Exploitation recognises that it has a duty to act on reports, or suspicions of abuse or neglect. It also acknowledges that taking action in cases of adult abuse is never easy.

How to respond if you receive an allegation:

* Reassure the person concerned.
* Listen to what they are saying.
* Record what you have been told/witnessed as soon as possible.
* Remain calm and do not show shock or disbelief.
* Tell them that the information will be treated seriously.
* Do not start to investigate or ask detailed or probing questions.
* Do not promise to keep it a secret.

If you witness abuse, or abuse has just taken place, the priorities will be:

* To call an ambulance if required.
* To call the Police if a crime has been committed.
* To preserve evidence.
* To keep yourself and others safe.
* To inform your line manager or the DASM.
* To record what happened in Stand Against Sexual Exploitation’s safeguarding adults database.

All situations of abuse or alleged abuse will be discussed with Helen Johnson. If anyone feels unable to raise their concern with their line manager or DASM, then concerns can be raised directly with Community Health and Social Care Direct (see below).

If it is appropriate and there is consent from the individual, or there is a good reason to override consent, such as risk to others, a referral will be made to Community Health and Social Care Direct team. If the individual experiencing abuse does not have mental capacity to consent to a referral, a best interest decision will be made on their behalf.

In line with Making Safeguarding Personal principles, the line manager and/or DASM should try to seek the views from the adult (or an appropriate representative) about what they would like to happen as result of the concern. This will help to inform the multi-agency Safeguarding Adults Enquiry.

Suspected or actual abuse

Immediate threat or crime committed?

Contact Police or Emergency Services

Inform line manager and/or Designated Adult Safeguarding Manager

Referral made to Community Health and Social Care Direct via telephone and then using Safeguarding Adults Initial Enquiry Form

The Line Manager and/or DASM will have an understanding of the multi-agency safeguarding adults process so they can explain it to the person concerned and offer all relevant support to the person and process. This could be practical support e.g. providing a venue, or information and reports and emotional support.

Information should be provided to the individual. This could be about other sources of help or information that could enable them to decide what to do about their experience, enable them to recover from their experience and enable them to seek justice.

1. **Managing an allegation made against a member of staff or volunteer**

Stand Against Sexual Exploitation will ensure that any allegations made against members or a member of staff will be dealt with swiftly.

Where a member of staff/volunteer is thought to have committed a criminal offence the Police will be informed. If a crime has been witnessed the Police should be contacted immediately.

The safety of the individual(s) concerned is paramount. A risk assessment must be undertaken immediately to assess the level of risk to all service users posed by the alleged perpetrator. This will include whether it is safe for them to continue in their role or any other role within the service whilst the investigation is undertaken.

The line manager and/or DASM will liaise with Community Health and Social Care Direct to discuss the best course of action and to ensure that Stand Against Sexual Exploitation’s disciplinary procedures are coordinated with any other enquiries taking place as part of the ongoing management of the allegation.

Stand Against Sexual Exploitation has a whistle blowing policy and staff are aware of this policy. Staff will be supported to use this policy.

### Recording and managing confidential information

Stand Against Sexual Exploitation is committed to maintaining confidentiality wherever possible and information around safeguarding adults issues should be shared only with those who need to know.

All allegations/concerns should be recorded in Stand Against Sexual Exploitation’s safeguarding database. The information should be factual and not based on opinions, record what the person tells you, what you have seen and witnesses if appropriate.

The information that is recorded will be kept secure and will comply with data protection.

This information will be secured in a locked filing cabinet/ or password protected files. Access to this information will be restricted to the DASM and Director of Trustees.

### Disseminating/Reviewing policy and procedures

This Safeguarding Adults Policy and Procedure will be clearly communicated to trustees, staff, volunteers, and service users and carers. The DASM will be responsible for ensuring that this is done.

The Safeguarding Adults Policy and Procedures will be reviewed annually by the Board of Trustees. The DASM will be involved in this process and can recommend any changes. The DASM will also ensure that any changes are clearly communicated to staff, volunteers, service users and carers. It may be appropriate to involve staff, volunteers, service users and carers in the review.

Appendix 1

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| **Safeguarding Adults Initial Enquiry Form** **(formerly the SAMA1 form)****This form is to be used to notify Adult Social Care of suspected or actual instances of abuse or neglect and is the start of a Safeguarding Adults (Section 42) Enquiry under the Care Act. Details of how and who to send this form to are available on page 4. Please attach further pages if necessary.**  |

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| **This form should be completed as fully as possible in order that robust decisions can be made about the progression, or otherwise, of the Safeguarding Adults Enquiry.**  |

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| --- | --- | --- | --- |
| **Person completing the form:** |  | **Role of Person:** |  |
| **Date of referral to Adult Social Care:** |  | **Organisation:** |  |
| **Phone number:** |  | **Type of service:** |  |
| **Details of incident/suspected/actual abuse or neglect** |
| **Date of alleged incident:** |  | **Who reported the alert/concern?** |  |
| **Time of alleged incident:** |  | **Date of report:** |  |
| **Where did the incident occur?**  |  |
| **Details of the adult at risk** |
| **Name:** |  | **Date of Birth:** |  |
| **Telephone:** |  | **Ethnicity:** |  |
| **Address:** |  |
| **What is the adult’s primary reason for needing care and support? (please tick)** |
| **Physical support:** |  | **Sensory support:** |  | **Support with memory and cognition:** |  |
| **Learning disability support:** |  | **Asperger’s syndrome support:** |  | **Autism support:** |  |
| **Mental health support:** |  | **Social support (includes support for carers/substance misusers):** |  | **No support reason:** |  |
| **Other health condition:** |  | **Please specify:** |  |
| **Any other details about the adult at risk:** |  |
| **Details of the alleged perpetrator (where relevant)** |
| **Name:** |  | **Relationship to victim:** |  |
| **Date of birth:** |  | **Ethnicity:** |  |
| **Address:** |  | **Telephone:** |  |
| **If the alleged perpetrator is a staff/volunteer, provide details *(e.g. employer, job role, work address)*:** |  |
| **Are they an adult with care and support needs?** | **Yes** |  | **No** |  |
| **Details of care and support needs *(if applicable)*:** |  |
| **Any other details about the alleged perpetrator(s):**  |  |

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| **Description of the alleged incident/harm** |
| **Please give a detailed description of the incident (including times), all people involved, witnesses and any other comments you feel are relevant. If the concern relates to physical abuse please provide a body map.** |
|  |
| **Type of abuse (tick all that apply):** |
| **Physical** |  | **Sexual** |  | **Psychological/emotional** |  |
| **Financial/material** |  | **Neglect/omission** |  | **Discriminatory** |  |
| **Organisational/institutional** |  | **Self-neglect** |  | **Domestic abuse/violence** |  |
| **Modern slavery** |  | **Radicalisation/extremism** |  | **Other** |  |
| **If other, please specify:** |
|  |
| **Is the victim at risk of further abuse/neglect? (please tick)** | **Yes** |  | **No** |  | **Unknown** |  |
| **What has been done to ensure the immediate safety of the alleged victim(s) and others? Completing and submitting this form does not constitute management of immediate risks.**  |
|  |
| **Were the Police called?**  | **Yes** |  | **No** |  |
| **Please provide the outcome of the Police action and Police log number (if available):** |
|  |
| **If the incident relates to domestic abuse/violence, has the MARAC Checklist (CAADA-DASH) been completed?** | **Yes** |  | **No** |  |
| **If yes, has a referral to MARAC been considered?****Please provide details, including discussions with your agency’s Single Point of Contact (SPOC) for MARAC:** | **Yes** |  | **No** |  |
|  |
| **Please provide details of other agencies involved that will be able to help with the safeguarding adults enquiry:** |
|  |
| **Are you aware that there have there been any previous referrals made in relation to this adult at risk or alleged perpetrator?** | **Yes** |  | **No** |  |
| **If yes, please provide details (e.g. dates, type of abuse, action taken):** |
|  |
| **Are there any risks to others (other adults, children)?** | **Yes** |  | **No** |  | **Unknown** |  |
| **Please provide details (also include who this information has been shared with – e.g. Police, Children’s Social Care, MAPPA). If there are risks to children you must notify Children’s Social Care.**  |
|  |
| **Involvement of the adult(s) at risk**The following section is crucial to determining the next steps in the safeguarding adults enquiry and every attempt should be made to complete it as fully as possible. |
| **Has the adult(s) at risk given consent for this referral?** | **Yes** |  | **No** |  |
| **If no, please confirm why you have not sought consent or are overriding consent (please tick):** |
| **Public interest (risks to others)** |  | **Risk of serious harm** |  | **Suspected serious crime**  |  |
| **Adult at risk lacks mental capacity to provide consent (best interest decision made)** |  | **Ability to consent is affected by threatening or coercive behaviour** |  | **Seeking consent would increase risks to the adult or others** |  |
| **Other, please provide details below:** |
|  |
| **Do you think the adult at risk has mental capacity in relation to making decisions about their safety?** | **Yes** |  | **No** |  |
| **If no, has a mental capacity assessment been undertaken?** | **Yes** |  | **No** |  |
| **Do you think the adult at risk would have substantial difficulty in participating in the safeguarding adults process?** | **Yes** |  | **No** |  |
| **If yes, is there a suitable person who could represent them? (e.g. family member, friend, advocate)** | **Yes** |  | **No** |  | **Unknown** |  |
| **Please provide the name and contact details of this suitable person:** |
|  |
| **Has the adult at risk’s family been informed of the concerns (where the adult has consented to this)?** | **Yes** |  | **No** |  |
| **If you think the adult at risk may need support to participate in the safeguarding adults process, please provide details of what support may be required:** |
|  |
| **What does the adult at risk (or their representative) say that they want to happen as a result of the safeguarding adults enquiry (desired outcomes)?** |
|  |
| **Signed:** |  | **Date:** |  |
| **Printed:** |  | **Time:** |  |

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| **What happens next?** |
| The local authority will use the information in this form to make an assessment of the level of harm and vulnerability of the adult at risk. Further information may be needed from you and other organisations involved. This assessment, alongside the desired outcomes of the adult at risk (or their representative) will determine whether the Safeguarding Adults Enquiry continues. The initial decision to progress, or not, is made by a manager in the local authority. Feedback will be provided to the person who completed this form, unless specified otherwise. **It is your responsibility to challenge decisions that you disagree with.** Please contact the local authority manager with your concerns. If you remain unhappy with the decision that has been made, please escalate your concerns to the Safeguarding Adults Unit, 0191 278 8156.  |

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| **This document contains personal and sensitive information when completed and should be stored securely according to your own organisation’s procedures. It is your responsibility to ensure that this is done.** |

**Information about how this document should be sent safely and securely**

Once completed, this document contains personal and sensitive information.

Appendix 2

**Overview of multi-agency safeguarding adults process**

Suggested timescales

**Stage 1 Initial Enquiry**

*(Referral to Local Authority)*

**Stage 2 Further Information Gathering**

*(Local authority gathers more information)*

**Stage 3 Strategy and Investigation**

*(Discussion/meeting with investigation by relevant person/organisation)*

**Stage 4 Protection Plan and Review**

*(Formal monitoring and review of Safeguarding Adults Plan)*

**Stage 5 Safeguarding Adults Enquiry Ends.**

Safeguarding Adults Plan in place.

One month

Safeguarding adults enquiries are:

* Driven by the desired outcomes of the adult or their representative;
* Multi-agency;
* Proportionate to the level of presenting harm/risk.

The Safeguarding Adults Enquiry can end at any stage, when it is felt that risks have been managed, and the desired outcomes of the adult (or their representative) have been met, as far as they possibly can be.

At every stage of the Safeguarding Adults Enquiry, risks will be assessed and a Safeguarding Adults Plan agreed.

ASAP within two working days

One working day (for LA decision)

3-6 months

Two working days