



Dudley Safeguarding People Partnership

Multi-Agency Adult Exploitation Strategy

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Introduction

Dudley Safeguarding People Partnership (DSPP) and partners in Dudley are committed to protecting adults from all types of exploitation. We recognise we have much to do to ensure that we deliver a consistently robust and integrated response to adults at risk of exploitation in the borough. We acknowledge that this is a fast changing and fluid landscape, however there is a strong collective commitment to working in partnership to identify exploitation at the earliest opportunity and, where necessary, to ensure that individuals, their families and support networks access the right services at the right time.

It outlines the partnership approach we are taking in the borough, and is aimed at people who are working to reduce exploitation in Dudley

Our ambition is to work in partnership to prevent exploitation; identify and protect those at risk of exploitation; strengthen resilience of victims and communities; support victims in their recovery; and pursue those who perpetrate exploitation and bring them to justice.

It is essential that all partners working with people at risk and the wider public understand what exploitation is, how it differs from other forms of abuse, and how to respond to concerns.

This strategy has been mandated by DSPP and will be delivered through the Exploitation Adults sub group

What do we mean by Exploitation?

The West Midlands regional definition of exploitation is:

An individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a person and exploits them:

- through violence or the threat of violence, and/or
- for financial or other advantage of the perpetrator or facilitator and/or
- in exchange for something the victim needs or wants.

The victim may have been exploited even if the activity appears consensual due to his /her specific situation. Exploitation does not always involve physical contact, it can also occur through the use of technology, e.g. as the result of a grooming process which takes place during conversations in chat rooms, or through the use of social media.

Dudley recognises that exploitation is deliberate maltreatment and manipulation irrespective of their age, gender, ethnicity, background or ability and sexuality and comes in many forms, including:

- Modern slavery
- Human trafficking
- Sexual exploitation
- Criminal exploitation
- Forced labour
- Domestic servitude

Exploitation can also be a strong feature of the following, but these are out of scope for this Strategy, as they already have embedded processes in place to respond to them:

- Radicalisation and extremism:
- Domestic violence and abuse (forced marriages, honour based violence and FGM)
- Rogue trader, bogus callers and scammers
- Abuse of positions of trust
- Hate crime
- Financial abuse
- Mate crime

Exploitation of Adults

Any person can be a victim of criminal exploitation as a result of their situation or circumstances, but some will be more at risk for a range of reasons. Extrinsic factors acting with intrinsic factors can make someone suffer or be at risk of harm

Where an adult has care and support needs is at risk of abuse or neglect and is unable to protect themselves because of those needs the Local Authority would be required to complete an enquiry under Section 42 of the Care Act 2014. The purpose of the enquiry would be to decide what action to take to support and protect the person in question.

The police would become involved in a section 42 enquiry if there was reasonable suspicion that a crime may have been committed and the harm caused to the adult concerned was deliberate, malicious or reckless. The Local Authority would refer the concern to the police in those instances and the Local Authority and the police would hold a 'strategy discussion' to agree a way forward.

It is important to highlight that an adult could still be at risk if exploitation but if the adult did not have care and support needs an enquiry under Section 42 of the Care Act 2014 would not be required. In those cases, partners would still have an obligation to take steps to prevent the exploitation from taking place.

It is acknowledged that victims may lack the capacity to consent or may be being threatened or coerced. Use of the Mental Capacity Act (2005) to protect and support people is key- this applies to people aged 16+. Grooming, coercion and control have all been known to have an impact on mental capacity, particularly where sexual or criminal exploitation is a factor.

Dudley Safeguarding People Partnership (DSPP) and partners in Dudley are committed to protecting adults from all types of exploitation. The Adult Exploitation Strategy will be delivered by the DSPP Exploitation Adults sub group as part of this commitment.

There are specific established processes and pathways already in place, such as MARAC and Channel Panel and although these are outside of the scope of this Strategy it is important that assurance is given to the links with safeguarding

Risks are primarily managed through established statutory safeguarding procedures.

Services delivered based on assessments of need should be appropriate to meet different levels. Broadly speaking these should be:-

- Universal Services which are available to everyone
- Targeted Support for individuals and families who require additional services to ensure lower level needs and risks are managed
- Specialist Services for individuals with the most significant and complex needs, including the need to be protected from harm.

(As part of an Action Plan to support the implementation of the Strategy Services will be mapped and gaps identified to inform future Service developments / commissioning opportunities).

National and Local Context

National Picture

National data, research and reviews are all evidencing the increase in modern slavery, trafficking, sexual exploitation and criminal exploitation of both children and adults.

The Home Office estimates that there are between 10,000-13,000 victims of modern slavery nationally, however this figure is likely to be hugely under-reported.

In 2020, 10,613 potential victims of modern slavery were referred to the NRM; a similar number to 2019. The plateau in referral numbers is primarily thought to result from the COVID-19 pandemic and associated restrictions. Of these, 63% (6,716) claimed that the exploitation occurred in the UK only, whilst 26% (2,722) claimed that the exploitation took place overseas only.

Just under half of referrals (48%; 5,087) were for individuals who claimed they were exploited as adults, whilst 47% (4,946) were for individuals who claimed they were exploited as children. The most common type of exploitation for adults was labour exploitation and for minors was criminal exploitation.

Potential victims from the UK, Albania and Vietnam were the three most common nationalities to be referred to the NRM. The Single Competent Authority made 10,608 reasonable grounds and 3,454 conclusive grounds decisions in 2020. Of these, 92% (9,765) of reasonable grounds and 89% (3,084) of conclusive grounds decisions were positive. Of the 2020 referrals, 8,665 are awaiting a conclusive grounds decision. During 2020, the DtN process referred 2,178 adults to the Home Office, a similar figure to 2019.¹

Gaming, social media and online forums all have a significant role to play in the trafficking and exploitation of adults. In addition, there is also recognition from the work of Programme Challenger in Greater Manchester that because services nationally have been working in silos for sexual exploitation, criminal exploitation, modern slavery and trafficking; they have not effectively shared information to recognise that many of the perpetrators are the same people.

There is limited information nationally, however, about the sexual exploitation of adults although it is clear that sexual exploitation does not stop when an individual reaches their 18th birthday and in some cases does not start until an individual has reached adulthood. Transition from childhood to adulthood can be seen as a particularly risky period in relation to sexual exploitation. The Casey 'Report of the Inspection of Rotherham Metropolitan Borough Council' in 2015 highlighted that "abuse and violence continues to affect victims into adulthood" and that there were "serious concerns about the group of young people during their transition to adulthood"

Professionals were increasingly becoming aware of other models of exploitation and their impact on vulnerable adults, in particular those involving criminal exploitation.

The National Crime Agency (NCA) reports that there are currently over 2000 individual deal line numbers in the UK. Exploitation remains integral to the business model with offenders recruiting, transporting and exploiting vulnerable individuals, to carry out criminal activity essential to their operations. There can be a high risk of violence and serious injury, including loss of life, in relation to county lines offending with vulnerable drug users and runners at the greatest risk of violence. In 2018 the Home Office published its Serious Violence Strategy outlining the Government's

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/970995/modern-slavery-national-referral-mechanism-statistics-end-year-summary-2020-hosb0821.pdf

response to knife, gun crime and homicide. Tackling 'county lines' and the misuse of drugs is one strand of the national strategy.

Regional approach

The West Midlands Police and Crime Commissioner (PCC) has set up the West Midlands Violence Reduction Board; a multi-agency strategic partnership which ensures and oversees the effectiveness of arrangements made by individual agencies. This Board will seek to co-ordinate efforts across the West Midlands Metropolitan Area in developing and implementing a public health, long term systemic approach to preventing and reducing violence, vulnerability and exploitation.

The establishment of the West Midlands Violence Reduction Unit (VRU) is a collaborative regional approach and there are agreements for each West Midlands authority to work with the VRU on its prevention agenda.

The West Midlands Human Trafficking and Modern Slavery Board has been established to ensure that there is an effective joined up approach to preventing, identifying and responding to safeguarding children, young people and adults at risk of or experiencing exploitation.

The Human Trafficking and Modern Slavery Board is responsible for the development and delivery of multi-agency strategies which prevent children, young people and adults from being harmed by slavery/trafficking; protect those who have been harmed; pursue offenders who have harmed them; and ensure that key stakeholders are effectively contributing towards delivery of the Board's priorities.

Membership includes senior strategic leads responsible for local service responses to Modern Slavery / Human Trafficking from a range of partner agencies, including the 7 Local Authority leads

The West Midlands Human Trafficking and Modern Slavery Board is accountable to the West Midlands Community Safety Partnership and will provide a six monthly update report to the Violence Reduction Board, Directors Adult Services Networks and other related forums.

The Modern Slavery Local Authority leads meetings have now been established, where the 7 Local Authorities share information and best practice. Service providers are also invited to part of these meetings in order to build closer links between them and the Local Authorities.

West Midlands Anti-slavery network is extremely well established to the point of winning an international award in 2021. This network meets quarterly to share best practice and looks at how to overcome barriers and challenges across the region.

Exploitation in Dudley

As a hidden crime, the number of identified victims of exploitation in Dudley is low, in line with the national trend, and as yet we do not have an accurate picture of victim/offender profiles or an understanding of the prevalence of exploitation in its various forms.

We do not have a comprehensive core dataset to help us to develop our understanding of exploitation in Dudley. We need to develop an understanding of prevalence and the profiles for victims and offenders, locations and models of offending. This will support development of the multi-agency response to those at risk and those already being exploited

Our Safeguarding Approach to Exploitation

It is important to recognise that adult safeguarding duties under the Care Act (2014) relate specifically to people who are at risk due to disability or illness. Young adults at risk may not be covered by Care Act duties. We are committed to working in partnership to develop approaches to reducing risk of exploitation for all adults. We will work across the partnership together to ensure the response to adult victims of exploitation combines elements from the following approaches.

Contextual Safeguarding is an approach that extends the parameters of traditional safeguarding systems to extra-familial settings and relationships.

Adults can be at risk from multiple threats including exploitation by criminal gangs and organised crime groups such as county lines; trafficking; online abuse; sexual exploitation and the influences of extremism leading to radicalisation. We also know that individuals can be both victims of and perpetrators of exploitation. When developing our response to exploitation we will consider the wider environmental factors that are a threat to their safety and/ or welfare, and we will consider the individual needs and vulnerabilities of those involved.

It requires practitioners to assess and intervene outside of the family setting and relationships in order to safeguard individuals at risk and will enable us to do two things:

- Recognise contextual risks during interventions: record contextual issues; collect information about extra-familial risks during assessments; make referrals about specific concerns.
- Address contextual risk: accept referrals for peer groups, schools and public spaces; screen referrals against contextual thresholds; subject them to assessment; discuss assessments at multi-agency meetings; action a plan to reduce the risks in these contexts. These actions feed into the individual family/vulnerable person assessments for the individual affected by that context.

To achieve this by taking into consideration local demographics, as well as the partnerships and operating systems used by Adult social care and their partners to safeguard against exploitation.

Young adulthood in particular, the nature of risks and the way they are experienced become increasingly complex with risks posed by peers, partners and other adults unconnected to their families. These risks:

- often manifest in extra-familial environments including colleges public spaces and online platforms
- are informed by peer norms and relationships

- involve young people perpetrating, as well as experiencing, harm
- can present as the result of perceived 'choices' a young person has made and/or continues to make despite professional/parental intervention
- often feature grooming, coercion, criminality and serious risks of significant sexual and physical harm that create climates of fear and reduce engagement with agencies
- are beyond the control of family members and rarely instigated by family members
- continue into adulthood and particularly for young people during the 18-25 transitional period.

Transitional safeguarding is simply a term used to highlight the need to improve the safeguarding response to older teenagers and young adults in a way that recognises their developmental needs. It recognises that adolescence extends into the early/mid-twenties (Sawyer et al. 2018) because the brain is not yet fully developed, and in some cases there will be a need for specific support to help an individual to navigate through this progression safely. A more fluid and transitional safeguarding approach is needed for young people entering adulthood given that the risk of harm, and its effects, does not stop at 18 years.

The adults safeguarding systems are governed by different statutory frameworks, which can make the transition to adulthood harder for young people facing ongoing risk and arguably harder for the professionals who are trying to navigate an effective approach to helping them. The 'cliff-edge' in terms of support can be exacerbated by notable differences between thresholds/eligibility criteria for children and adult safeguarding responses (Firmin et al., Research in Practice, 2019).

Strengths-based working

Strengths-based practice is all about the relationship between those who are supported by services and those who provide that support. This means working in collaboration with the person to support them to develop solutions, enabling them to achieve the outcomes which are important to them. In a world of experts they are the experts on what is important to them.

Focusing on strengths does not mean ignoring challenges and addressing these accordingly. Strengths-based approaches are not prescriptive; there is no one-size fits-all model. The strength based approach requires both the practitioner and the person to focus upon their personal strengths and abilities.

The focus is not on what the person can't do, but on where their strengths lie and the supports they have around them in their family and the community.

In strengths-based practice the individual is empowered to have as much choice and control as possible and encouraged to propose options and solutions to enable them to have the life they want.

This is particularly important when working with adults at risk of exploitation, in order to support them to regain control and enable long-term change.

Trauma-Informed Practice

Trauma-Informed practice is grounded in an understanding of and responsiveness to the impact of trauma, and emphasises physical, psychological, and emotional safety for everyone, and creates opportunities for survivors to rebuild a sense of control and empowerment (Hopper et al., 2010).

Extensive research has been completed on the effects of trauma on the brain, memories of traumatic events are different to memories of non-traumatic events.

When a person is subjected to the threat of being killed or abused, or witnesses this threat in relation to other people, their body reacts in specific ways to enhance their chances of physical survival. This biological and evolved reaction also affects the parts of the brain that are responsible for the laying down of memory.

Many survivors of trauma experience feelings of shame and humiliation, which can prevent them from feeling able to express themselves and to assert their needs with others. Survivors will often not display any signs of fear or confusion and will appear to be fine and able to manage; they will often minimise, conceal or deny being injured.

Professionals working with survivors of exploitation will need to have a level of awareness and training to enable them to understand the exploited person's individual needs and be able to develop a working relationship based on trust. At every stage it will be essential to demonstrate an interest in survivors' well-being beginning from getting the first contact right, delivering a calm, kind, consistent approach at all times and in all environments.

Duties and Powers

Across the Partnership agencies will use the duties and powers invested in them to prevent exploitation and protect and empower victims at risk of or experiencing exploitation. Relevant statutory guidance and legislation includes:

- Care Act 2014
- Mental Capacity Act 2005
- Mental Health Act 1983
- Making Safeguarding Personal: Guide 2014
- Modern Slavery Act 2015
- Crime and Disorder Act 1998
- Prevent Duty 2015

In summary we will seek to identify and protect victims of exploitation by:

- sharing information in a timely manner
- taking a holistic and contextual approach rather than concentrating on risks, incidents and indicators
- ensuring that young adults aged 18+ continue to receive services to support their safe transition to adulthood
- not criminalising victims
- giving consideration to the impact of trauma and providing support to victims in rebuilding a sense of control and empowerment

Strategic Objectives

We acknowledge that this will be challenging as there are no easy solutions, but we can and must do more to protect those who are being exploited now or are at risk of being exploited in the future.

When a person is being forced or coerced to commit crime, we will ensure that we respond intelligently as far too often those being exploited are often criminalised rather than being seen as victims of exploitation. We will ensure that there is an appropriate response to those being exploited.

In developing our response to adult exploitation, we are committed to Making Safeguarding Personal and the six key principles of safeguarding that underpin this:

- Empowerment
- Prevention
- Proportionality
- Protection
- Partnership
- Accountability

The Four P's Approach

Prepare:

To reduce the impact of exploitation. Adults have a right to be educated about associated dangers to prevent and enable them to protect themselves. This strategy aims to prevent adults with care and support needs from experiencing, or continuing to experience, exploitation by providing effective awareness-raising and quality learning and development opportunities.

Prevent:

To prevent people from becoming victims and perpetrators of exploitation. All partners have a responsibility to safeguard adults from harm. This strategy aims to develop an intelligence picture which will inform local partnership understanding of context, and locations of concern.

Protect:

To strengthen safeguards against exploitation. Single and multi-agency processes and procedures must be effective, efficient and for purpose. This strategy aims to effective victim centred practice and service provision, to protect those who may be experiencing or are at risk of exploitation.

Pursue:

To prosecute and disrupt perpetrators of exploitation. Exploitation within Dudley needs to be identified and disrupted. This strategy aims to identify methods in which information can be used to assess, intervene, and prosecute those who seek to facilitate and /or perpetrate exploitation.

Measuring Success

The success of the strategy will be measured based on a range of quantitative and qualitative measures

Measures will include:-

- Timeliness of response to referrals/concerns
- Increase in exploitation referrals/concerns
- Improve prosecution outcomes for crimes associated with exploitation
- Increase over time in percentage of agencies grading themselves good or outstanding against practice standards
- Increase in NRM referrals / DtN submissions
- Increase in FIB submissions
- Agency attendance at meetings
- Increase in number of safety plans due to risk of exploitation
- Decrease in numbers of adults who are re-referred due to exploitation concerns following disruption/safeguarding interventions

Qualitative Measures

- Audits of exploitation cases evidence effective screening, intervention, information sharing and multi-agency working
- Positive evaluation proportionate case tracking
- Increase in practitioner confidence and skills across the workforce
- Evidence of positive feedback from individuals on their experiences and the impact of support received

Review and Evaluation

This Strategy will be reviewed on an annual basis for relevance and effectiveness.

The Delivery Action Plan will be monitored against identified outcomes and the difference made to individuals, their families and supporters will be evaluated through audits and other quality assurance activity through routine reporting from the Exploitation Sub group to the Safeguarding Adults Board.

Appendix – Definitions

Modern Slavery	<p>Activities that involve one person keeping another person in compelled service (Home Office 2016). The Modern Slavery Act (2015) includes: forced labour, forced criminality, sexual exploitation, forced marriage and domestic servitude. Someone is in slavery if they are:</p> <ul style="list-style-type: none"> • Forced to work through mental or physical threat • Owned or controlled by an “employer”, usually through mental or physical abuse or the threat of abuse, often with perceptions of “debt bondage”. • Dehumanised, treated like a commodity or bought and sold as “property”. <p>Physically constrained or have restrictions placed on his/her freedom</p>
Human Trafficking / Labour Exploitation	<p>Human trafficking involves recruitment, harbouring or transporting people into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will (antislavery.org).</p> <p>The Palermo Protocol to prevent, suppress and punish trafficking in persons is the internationally accepted definition of human trafficking. This Protocol (which is in force) was signed by the United Kingdom on 14 December 2000 and ratified on 9 February 2006. It provides a definition of trafficking which has since become a widely accepted standard and used in other international instruments. It also outlines protection for victims</p>
Domestic Servitude	<p>This involves children, men and women being forced to work in private households performing tasks such as childcare and housekeeping for little or no pay and often in abusive conditions.</p>
Sexual Exploitation	<p>This includes adults trafficked as part of the sex trade.</p>
Forced Criminalisation	<p>This involves victims; often children, who are forced to commit a range of crimes, including counterfeit DVD selling, bag snatching, ATM theft, pick-pocketing, forced begging, forced sham marriage and cannabis cultivation.</p>
Financial Exploitation	<p>This refers to illegal or improper use of an older person’s funds, property, or assets by a trusted person or entity. This frequently occurs without the explicit knowledge or consent of a senior or disabled adult. Assets are commonly taken via forms of deception, coercion, harassment, duress and threats.</p>
Forced Marriage	<p>Where one or both parties do not wish to get married but are forced to by others, usually their families. People forced into marriage may be tricked into going abroad, physically threatened and/or emotionally blackmailed to do so.</p>
Radicalisation	<p>The ‘grooming’ or ‘recruitment’ process by which a person comes to support terrorism and forms of extremism leading to terrorism.</p>
Fraud and Scams	<p>Predominantly involves money or transactions that involve financial loss to the victim performed by a dishonest individual, group, or company.</p>
County Lines	<p>This involves drug lines operated by a telephone line often from cities such as London, Birmingham, Manchester and Liverpool sending dealers to sell in smaller towns, and coastal areas. Many gangs form a secure base in the homes of vulnerable people and force assistance by using violence or exploiting an addiction to drugs.</p>

Cuckooing	This involves a drug dealer or other criminal befriending a vulnerable individual who lives on their own. Like a cuckoo, the offender moves in, takes over the property, and turns it into a drug den or other criminal base.
Mate Crime	<p>There is no statutory definition of mate crime in UK law. The term is generally understood to refer to the befriending of people, who are perceived by perpetrators to be vulnerable, for the purposes of taking advantage of, exploiting and/ or abusing them. This can strongly but not exclusively associated, with people with a learning disability, learning difficulties or mental health conditions.</p> <p>Mate Crime happens when someone ‘makes friends’ with a person and goes on to abuse or exploit that relationship. The founding intention of the relationship, from the point of view of the perpetrator, is likely to be criminal. The relationship is likely to be of some duration and, if unchecked, may lead to a pattern of repeat and worsening abuse. Whilst there is no legal definition of mate crime, in many situations mate crime will be an example of disability hate crime.</p>
Delayed Reporting (e.g. of CSE)	Children and young people who are sexually abused or exploited often find it difficult to report their ordeal at the time the incident occurred (for example due to a fear of not being believed). Some allegations of sexual abuse and/or exploitation are reported a considerable period of time after the abuse took place (for example to make the authorities aware).