



Heddlu Police
DYFED-POWYS

Criminal Exploitation Policy

Policy summary:	<i>The purpose of this document is to ensure that Dyfed-Powys Police has a consistent and professional approach to policing incidents of exploitation involving children and adults in line with the College of Policing Authorised Professional Practice.</i>			
Policy number:	031/2021			
Version control:	Version	Date	Author	Rationale
	1	28/05/21	[REDACTED]	New Policy
Date implemented:	01/06/2021			
Review date:	One year from published date.			
Owner/contact: (approved by –Board)	Vulnerability Hub			
Consultation and approval	Detective Superintendent [REDACTED] DCI [REDACTED]			
Welsh Translation	Yes	☒	No	



1. Statement of Policy

The aim of the policy is to ensure that Dyfed-Powys Police has a consistent and professional approach to policing incidents of criminal exploitation involving both adults and children.

Dyfed-Powys police consider criminal exploitation as including;

- i Slavery, servitude and forced or compulsory labour
- ii sexual exploitation
- iii Removal of organs
- iv Securing services by force, threats or deception
- v Securing services from children and vulnerable persons

Dyfed-Powys adopts the following definition for Child Criminal Exploitation as set out in the Home Office's 2018 Serious Violence Strategy;

Child Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

Dyfed-Powys Police are committed to tackling all forms of criminal exploitation recognising its reach beyond our force borders. Engagement with local, regional and national partners will take place to ensure effective information sharing and joint working through the use of shared intelligence and assets.



Where exploitation is identified Dyfed-Powys Police will provide a robust response to investigate the criminal activity and protect victims through the use of civil orders and other existing pathways for support.

Dyfed-Powys Police will recognise that many of those exploited will not identify themselves as victims and a victim centred approach is necessary to secure evidence and achieve engagement with safeguarding measures.

The policy applies to all categories of Dyfed-Powys Police employees, whether full time, part time, permanent, fixed term, temporary (including agency staff) or seconded staff.

2. Policy Scope

Dyfed-Powys Police recognises the impact on the lives of individuals who are exposed to criminal exploitation. We also recognise the impact this can have on the lives of close family members and the wider community.

The safeguarding of individuals at risk of exploitation is paramount and identification of potential risk should be recognised as an opportunity to identify and address risks. The reasons for a person being identified as being at risk of exploitation may be complex and linked to a variety of social or family issues.

Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or vulnerable adult to commit criminal offences or be subjected to criminal acts. The victim may be criminally exploited even if the activity appears consensual.

It is accepted that the following are priorities for Dyfed-Powys Police in its approach to exploitation:

- Effective and early identification of those individuals at risk of exploitation.
- A consistent multi agency approach to safeguarding individuals at risk of exploitation.
- Engagement with wider community to raise awareness of the risks and signs of criminal exploitation.
- Robustly target and prosecute those who criminally exploit others no matter where they live.



The above principles are everybody's business and Dyfed-Powys will equip its staff to recognise and respond quickly and effectively to protect those at risk of harm.

This policy will be made available for all staff to follow during the course of their duties and offices will be provided specific localised procedure guidance in line with Authorised Professional Practice on missing person investigations from the College of Policing.

The principles of this policy will be followed by all staff when dealing with the pattern of reporting, responding to and investigating reports of criminal exploitation. Dyfed-Powys Police guidance will provide details of the responsibilities of all parties involved in the conduct and management of investigations, from first contact with an employee of Dyfed-Powys to the conclusion of the investigation.

Guidance will be available to all staff on the internal intranet site.

The safety and wellbeing of individuals at risk of exploitation is paramount. Failure to identify and appropriately grade risks at the earliest opportunity could have serious consequences.

3. Powers and Policy/Legal Requirements

Due to the sheer scope of criminal exploitation and the varied acts of parliament that encompass potential criminal offences that can be committed by exploited individuals this section is limited to specific acts/ offences that would be committed by the individuals or groups carrying out the exploiting.

Modern Day Slavery Act 2015

Sexual Offences Act 2003

Serious Violence Strategy 2018, Home Office

The Wales Safeguarding Procedures



The following are the Approved Professional Practices created by the College of Policing which outline best practice (this information can be found directly on the College of Policing Approved Professional Practice website):

- College of policing APP for Child Sexual Exploitation
- College of Policing APP for Prostitution and Sex Work
- College of Policing APP for Modern Day Slavery

EQUALITY IMPACT ASSESSMENT

Section 4 of the Equality Act 2010 sets out the **protected characteristics** that qualify for protection under the Act as follows: Age; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy and Maternity; Race; Religion or Belief; Sex; Sexual Orientation.

The **public sector equality duty** places a proactive legal requirement on public bodies to have regard, in the exercise of their functions, to the need to:

- eliminate discrimination, harassment, victimisation, and any other conduct that is unlawful under the Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The equality duty applies to all protected characteristics with the exception of Marriage and Civil Partnership, to which only the duty to have regard to the need to eliminate discrimination applies.

Carrying out an **equality impact assessment** involves systematically assessing the likely or actual effects of policies on people in respect of all the protected characteristics set out above.

An equality impact assessment should be carried out on any policy that is **relevant** to the public sector equality duty. An equality impact assessment template is available [here](#). A welsh version of the equality impact assessment template is also available [here](#). Guidance on how to complete the template can be found on the diversity intranet page.

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Equality Impact Assessment Completed	
Name:	██████████
Department:	CID- Vulnerability Hub
Signed:	██████████
Date:	14/12/20

HUMAN RIGHTS ACT

CERTIFICATE OF COMPLIANCE

This policy has been drafted in accordance with the Human Rights Act and has been reviewed on the basis of its content and the supporting evidence and it is deemed compliant with that Act and the principles underpinning it.

Name:	██████████
Department:	Legal Services
Signed:	██████████
Date:	28 May 2021

4. Options and Contingencies

This policy will be owned by CID- PVP.

It will be reviewed regularly to ensure its effectiveness and make necessary amendments in relation to changes and updates in related legislation and guidance.



Approval decisions regarding the implementation of this policy will be made by the Detective Superintendent of Protecting Vulnerable People and the Strategic Vulnerability Group.

Scrutiny and audit of force records is regularly carried out to ensure Dyfed-Powys Police have acted accordingly to safeguard and seek support for vulnerable persons where necessary.

The following Code of Ethics principles apply:

- Accountability – We will be answerable for the decisions, actions and omissions made in relation to the application of this policy.
- Fairness – This policy will be implemented regardless of race, religion, sexual orientation, disability or gender.
- Honesty – We will apply the contents of this policy with honesty to maintain the trust of the community we serve.
- Integrity – We will apply this policy ensuring we are striving to do the best we can for the more vulnerable members of our communities.
- Objectivity – The application of this policy will be based upon evidence and best professional judgement.
- Openness – We will be open and transparent in our actions and decisions.
- Respect – We will treat all members of the community with respect and maintain the dignity .
- Selflessness – We will act selflessly in the best public interest.

CODE OF ETHICS

CERTIFICATE OF COMPLIANCE

This policy has been drafted in accordance with the Code of Ethics and has been reviewed on the basis of its content and the supporting evidence and it is deemed compliant with that Code and the principles underpinning it.



Name:	[REDACTED]
Department:	Vulnerability Hub
Signed:	[REDACTED]
Date:	01/02/21

5. Take action and review

Our progress is reviewed regularly within the Strategic Vulnerability Group which provides governance and oversight, ensuring that the strategic approach and response to vulnerability is fully embedded within the organisation.

The group is chaired by the Detective Chief Superintendent, Head of CID, and reports to the Assistant Chief Constable and into the Force Performance Board.

The Strategic Vulnerability Group will continue to monitor effectiveness, focusing on continuous learning in this area.

The NPCC National Vulnerability Action Plan provides clear direction and focus. Our progress against this plan is reviewed regularly within the Strategic Vulnerability Group.

Regular reviews and audits of incident logs, records and decision making is carried out to ensure we are in compliance with all legislation and guidance listed in section 3 of this document.

Freedom of Information Act 2000

Section 19 of the Freedom of Information Act 2000 places a requirement upon the Force to publish all policies on the Force website. Policies are why we do things and procedures are how we do them. A case-by-case review of procedures must be undertaken to protect law enforcement and health and safety considerations. Where a combined policy and procedure document is being produced the Force is legally

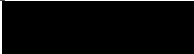
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required to publish the policy section and assess the procedure part to ensure no sensitive information is published. Generally the default position shall be that a policy and accompanying procedure document will be produced separately.

There is a requirement therefore to review this document to establish its suitability for publication. Please identify below whether the document is suitable for publication in its entirety or not. Where it is believed that disclosure will be harmful please articulate the harm that publication would cause and highlight the relevant sections within the document. Where it is perceived that there is harm in disclosure the document should be forwarded to the Disclosure Unit for review.

Suitability for publication

Suitability for publication	Yes/No	Date	Signature
Document is suitable for publication in its entirety	✓	01/02/21	
Document is suitable for publication in part, I have identified those sections which I believe are not suitable for disclosure and have articulated below the harm which would be caused by publication.			
Harm – in publication			

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FOI review – to be completed by Disclosure Unit

(Only required if author believes there is any harm in disclosure)

Suitability for publication	Yes/No	Date	FOI Decision Maker
Document is suitable for publication in its entirety			
Document is suitable for disclosure in part and relevant redactions have been applied. A public facing version has been created.			
Once review has been undertaken FOI Disclosure Officer to return document to policy author and following sign-off document to be published within Force Publication Scheme. Any future changes to the document should be brought to the attention of the Disclosure Unit, as appropriate.			