



Adult Complex Safeguarding and Exploitation Strategy

2022 – 2024

Version 2: October 2022

Produced by: Joint OSAB and OSCP Contextual Safeguarding Group



Vision

Our vision is for all children, young people, and adults in Oldham to feel safe and protected from the risk of exploitation. A borough where those who are vulnerable to abuse have clear pathways of support rooted in the local community; and where the whole system works together to improve the outcomes for those at risk of exploitation.

Introduction

This Adult Complex Safeguarding and Exploitation Strategy has been developed as a joint initiative between the Children's and Adults Safeguarding Boards and members of Oldham's Community Safety Partnership. It sets out Oldham's understanding of adolescent and adult exploitation and how partners will work together to improve the lives of those at risk of exploitation.

The term Complex Safeguarding and Exploitation is used to describe cases that combine criminal exploitation with other safeguarding factors including substance misuse, domestic abuse, adverse childhood experiences, homelessness, learning disabilities and/or mental health issues.

For the purpose of this strategy the term adult exploitation is used to cover:

- **Sexual exploitation** – abuse of a position of vulnerability, power, or trust, for sexual purposes leading to financial or social gain.
- **Financial exploitation** – abuse of a position of vulnerability, power, or trust, to deceive or coerce an adult into handing over money or assets through fraud or blackmail.
- **Modern Slavery** – organised recruitment and movement of individuals through coercion or abuse for the purpose of exploitation including compulsory labour.
- **Criminal exploitation** – abuse of a position of vulnerability, power, or trust to groom or coerce an adult to engage in criminal activity, including County Lines drug networks.
- **Cuckooing** – abuse of a position of vulnerability, power, or trust to use an adult's property for criminal activities and financial gain.

In common with other areas, Oldham is seeing an increase in the numbers of people being exploited, and the sophistication of methods used to draw people in. This strategy recognises that those who seek to abuse young people and adults do so by exploiting them or their situation using deception and coercion.

This means that individuals can become victims of exploitation at any age and exploitation is not confined to children and young people.

In addition, the social and environmental factors that enable the exploitation of young people usually continue into adulthood, as does the impact of childhood trauma. This means that those being exploited can move onto, or are coerced into, exploiting other people vulnerable to abuse, blurring the boundary between trauma victim and perpetrator.



Purpose and Commitment

Drawing on learning from Oldham's Safeguarding Adult Reviews, Domestic Homicide Reviews and Child Safeguarding Practice Reviews this strategy sets out the factors facing young adults aged 16 and over who are at risk of exploitation. The strategy also sets out multi-agency commitments, including the sharing of intelligence and working beyond traditional geographical, age and statutory boundaries, to ensure a whole system response designed to tackle all forms of exploitation in Oldham.

This strategy should be read alongside Oldham's Children and Young People's Contextual Approach to Complex Safeguarding strategy 2020 – 2023 which can be found [here](#).

What is Complex Safeguarding?

Any person can be a victim of criminal exploitation but there will be some who, due to their situation or circumstances, will be at greater risk. The term **Complex Safeguarding** was developed by Greater Manchester to describe children and young people and is defined as:

A criminal activity (often organised) or behaviour associated with criminality, involving children and young adults (often vulnerable) where there is exploitation and/or a clear or implied safeguarding concern.

Currently, there isn't an agreed Greater Manchester definition of Complex Safeguarding for adults. So, for the purpose of this strategy the children's definition has been adapted as a starting point to describe Oldham's adult complex safeguarding and exploitation offer:

“Complex Safeguarding involves criminal activity (often organised), or behaviour associated with criminality involving young people and adults aged 16 and over who are at particular risk to exploitation. Adult safeguarding cases are considered complex where exploitation is combined with risk factors which include, but are not limited to, previous trauma, drug & alcohol misuse, mental health issues, learning disabilities, dementia, acquired brain injury, domestic abuse, and homelessness.”

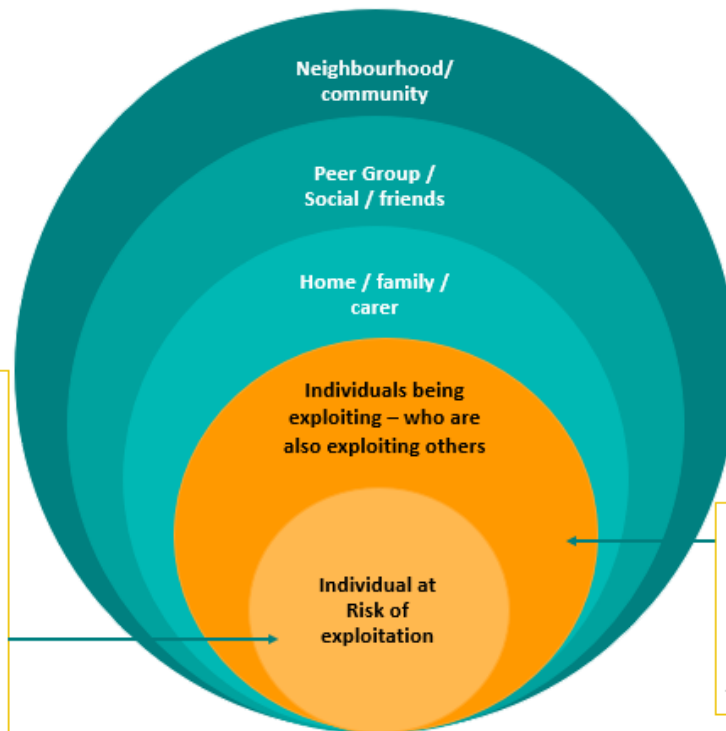
Cases are considered complex because perpetrators take advantage of an individual's situation such as growing up in poverty, having a learning difficulty or being excluded from school.

Cases can also involve the exploitation of an adult at risk by another adult who is being coerced into carrying out criminal exploitation. This definition reflects the types of cases currently being managed through multi-agency safeguarding processes in Oldham.

Figure 1

Complex Safeguarding - Risks factors

- Person with complex diagnosis and behaviours:
- Mental health issues/diagnosis
 - Learning disability or autism
 - Dementia
 - Victim of Domestic Abuse
 - Socially isolated
 - Addiction or dual diagnosis
 - Self Neglect
 - Reluctant to engage with services
 - Experience of previous trauma/abuse or neglect
 - Removal of a child into care



Grooming and coercion of adults to exploit others – e.g. adults with a LD, addiction or through sex work
 Targeting of vulnerable adults for financial exploitation and cuckooing – e.g. socially isolated older men

What is Contextual Safeguarding?

Whilst Complex Safeguarding focuses on the individual, **Contextual Safeguarding** focuses on the wider social and environment factors that can put an individual at risk of harm.

Developed by Dr Firmin from the University of Bedfordshire the term Contextual Safeguarding has been used to focus on external factors facing children and young adults aged between 10 and 25.

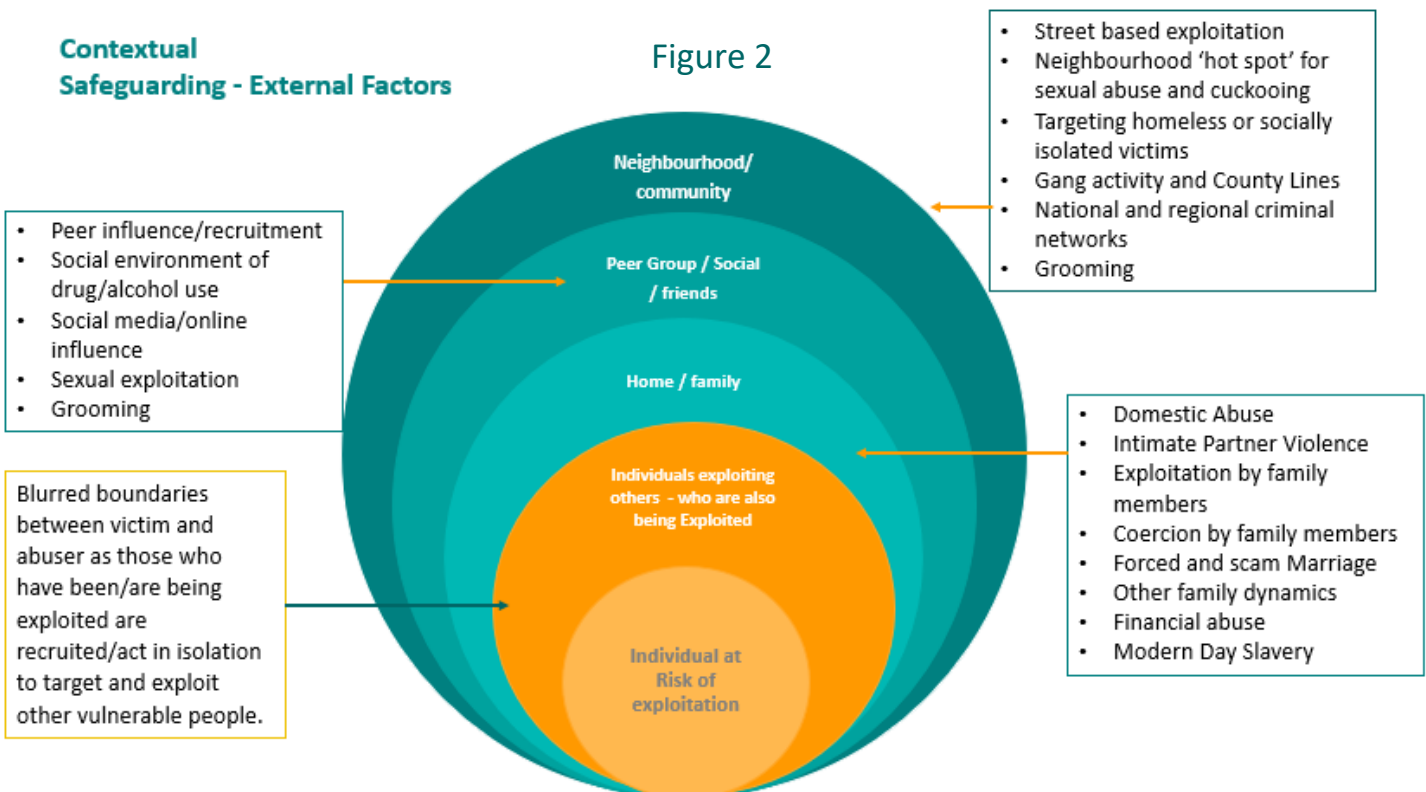
Contextual Safeguarding is characterised by the use of deception, coercion, and control by those in a position of power or trust in order to force people into a situation they cannot leave. Understanding this is key to help identify where the external risks might come from and to provide a framework to help services track and manage risk and prevent future harm.

Partners in Oldham recognise that many of the social and environmental factors that pose a risk to adolescents, can pose a risk to adults of all ages. Figure 2 highlights the most common external risk factors for adults experiencing criminal exploitation.

Currently there isn't an agreed Greater Manchester definition for Contextual Safeguarding for adults, so local partners have adopted the following definition as a starting point in Oldham:

Contextual Safeguarding is an approach to understanding external risk factors and responding to people's experiences of significant harm. It recognises that the different relationships that people form can feature violence, exploitation, and abuse; and often involve the targeting of adults vulnerable to abuse. Services can have limited influence to protect an **adult at risk of harm** where the adult has the capacity or fluctuating capacity, to make decisions that can put them at risk of harm.

Whilst children's and adult's legislation use the age of 18 to mark a child's transition to adult hood, the Mental Capacity Act (2005) uses the age of 16 as the point where a young person is deemed to have capacity to weigh up risks and make informed choices. This can include making what is termed in the Care Act as an 'unwise decision' that can lead to harm. As capacity and decision making is a key factor within adult complex safeguarding, this strategy has aligned itself with the MCA definition and covers young people from the age of 16 and over.



Learning from Lived Experience

This strategy is designed to respond to the different forms of exploitation identified through Oldham's multi-agency safeguarding processes, as well as learning from recent Safeguarding Adult Reviews. The following anonymised cases provide a snapshot of some people's experiences of exploitation in Oldham.

CHLOE

Adopted as a toddler, Chloe's adoptive parents struggled to manage her behaviour and she eventually went back into the care of the local authority. Chloe has a diagnosed learning disability and a history of trauma and adverse childhood experiences. She is a very trusting person and this combined with other factors such as a lack of money, homelessness and dependency on drugs has meant she is at high risk of being exploited. Chloe has experienced kidnapping, organised trafficking, forced heroin injections and sexual exploitation.

AZRAH

As a child, Azrah was the victim of neglect and physical abuse by her father and brothers. She moved into the care of the local authority but when she returned to her family as a young adult, she was sexually exploited by her brother in return for heroin. Azrah has a history of self-harm, mental health issues, adverse childhood experiences, homelessness, and drug dependency. She has also committed several criminal acts linked to substance misuse which resulted in a custodial prison sentence. On release from prison, Azrah was befriended by an older man who sexually exploited her in return for drugs and she also disclosed that she has been kidnapped, trafficked, and coerced into sex working.

DANIEL

Diagnosed with a learning difficulty, Daniel grew up initially in foster care and then in residential care. Daniel experienced sexual abuse as a child and as an adult he is known as both a victim and perpetrator of abuse. He has exploited other adults who are vulnerable to abuse and has been accused of violence, rape, criminal exploitation, cuckooing, and making threats to kill.

PETER

Peter is in his 70s and lives alone in rented property. He is socially isolated and has poor physical and mental health as well as issues with his memory. Peter was befriended by a young man who regularly 'borrowed' money but did not pay it back, stole his medication and over time would stay at Peter's property which he used as a base to deal drugs. Adult services became aware of Peter when he started turning carers away because he was unable to pay for his care and support and was relying on foodbank parcels. Peter told housing services that he did not feel safe because this man was always hanging around and wanted to move.

FAHAD

Removed from his mother at an early age due to neglect and her heroin addiction, Fahad grew up in the care of his extended family. Fahad was diagnosed with paranoid schizophrenia and experienced mental and behavioural disturbances due to alcohol and illicit drug use. Fahad was known to spend time with drug dealers and at one point he was found rough sleeping in London to get away from the dealers in Oldham because of drug debts. Adult services become aware of Fahad following reports that he was being trafficked and sexually exploited and also due to concerns that he was being radicalised.

NATASHA

Arriving in the UK as a refugee Natasha was targeted because of her unstable residency and lack of housing. With no recourse to public funds, Natasha was befriended and coerced into living with a man who went onto abuse her and exploit her for free labour. Natasha now finds herself trapped. She is not allowed to work to earn money so she can move out because she does not 'have any papers' and she is not entitled to housing because she already has a place to live.

National and Regional Context

In line with the Modern Slavery Act (2015), data on the different forms of exploitation covered in this strategy are recorded by the Home Office under the general heading of modern slavery.

Research by the National Crime Agency suggests that in previous years sexual exploitation and labour exploitation were the most common forms of modern slavery. However, data for 2021/22 suggests that these forms have been overtaken by criminal exploitation which includes the county lines model of distributing and selling illegal narcotics.

National Data Profile

- the number of potential child victims of exploitation has increased from 5,028 in 2020 to 5,468 in 2021.
- of the 91% assessed as being 'reasonably likely' to be a victim, 82% were aged 15 to 17 years old.
- boys were most likely to have been criminally exploited (62%) while girls were most likely to have been sexually exploited (42%).
- the number of potential adult victims increased from 10,600 in 2020 to 12,727 in 2021.
- of these, 77% (9,790) were male and 23% (2,923) were female which is consistent with previous year's figures.

Oldham Data Profile

- in 2021/22 there were 83 reported cases of modern slavery in Oldham.
- this is slightly higher than the Greater Manchester average of 72.
- Oldham's referrals in the last two years break down into criminal exploitation (43%), sexual exploitation (37%), forced labour (7%) and domestic servitude (2%).
- criminal exploitation cases include forced begging, cuckooing of properties and males involved in drug related activity.
- labour exploitation cases include forced labour in family businesses and forced labour in private construction jobs.

Safeguarding and Population Health

Understanding and monitoring local data trends is vital to the disruption and prevention of adult exploitation. To support this, local partners have signed up to the Population Health Management (PHM) principles which identifies the following four pillars that lead to poor outcomes for different population groups:

1. **The wider determinants of health:** these are the most important drivers of wellbeing that include income, education, housing, and transport.
2. **Health behaviours and lifestyle:** these are the second most important drivers of wellbeing which include smoking, alcohol, illegal drugs, diet, and exercise.
3. **Places and communities:** the local environment is also an important factor, including the impact of social relationships and community networks on mental health.
4. **Integrated services:** this reflects the growing number of people with multiple long-term health conditions and the need to integrate services around needs rather than organisational silos.

The presence of one or more of these factors increases an individual's risk to exploitation and there is a correlation between high levels of exploitation and areas of high socio-economic deprivation.

Evidence shows that criminal gangs target young people and adults at risk of exploitation through the offer of 'gifts' such as food, drink, clothes, phones, money, warm spaces, and drugs. Perpetrators also target or create places to meet that are attractive to young people who have no other alternatives. These young people then invite their friends to join them.

This correlation between socio-economic deprivation and exploitation means that the current cost-of-living increases will push more families below the poverty line, which in turn will increase the number of people at risk of exploitation.

PHM shows that to be successful, local services need to tackle all four pillars, rather than address one or two elements in isolation. This collective, system wide approach is central to Oldham's borough wide and neighbourhood response to exploitation.

Oldham's Approach

The following section sets out Oldham's approach to tackling complex safeguarding and exploitation for young people and adults aged 16 and over. Ours is an evolving approach designed to support victims and survivors of exploitation; disrupt and convict perpetrators; and prevent future harm. Oldham's approach combines the following elements:

1. Transitional Safeguarding (up to 25)
2. Specialist Safeguarding Response (18+)
3. Place Based Working
4. Strengths Based Working and ACEs

1. Transitional Safeguarding

Transitional Safeguarding is a term used to describe the way services support young people with additional developmental or safeguarding needs in the years leading up to their 18th birthday (or 25 for a care leaver).

Learning from [Research in Practice](#) and Oldham's Safeguarding Adult Reviews (SARs) highlights the need for planning to start at 14 and for a 'doubling up' of effort by services to support adolescents as they transition from children's to adults' services. In response, Oldham has set up a multi-agency Transitions Hub to ensure the safe and successful transition across services, which includes adolescents at risk of exploitation.

2. Specialist Safeguarding Response

Young people aged between 16 and 25 who are at risk of exploitation are also supported through the Complex Safeguarding Hub. The hub is designed to facilitate information-sharing and joint operations through the co-location of staff from social care and the police and has a dual role supporting victims and pursuing perpetrators of organised crime.

Adults aged 25 and over at risk of exploitation are supported through a Specialist Safeguarding Response. Cases are triaged through the Adult Referral Contact Centre (ARCC) and depending on the level of risk the case is managed through one of three pathways:

- **Multi-Agency Safeguarding Hub (MASH)** for cases involving adults at risk of exploitation who have care and support needs eligible under the 2014 Care Act.
- **Multi-Agency Public Protection Arrangements (MAPPA)** for cases involving violent and sexual offenders living in the community that pose a risk of exploitation to the others.
- **Tiered Risk Assessment and Management Protocol and Critical Risk Panel** for cases that do not meet the criteria for MASH or MAPPA. The process is designed to share information and intelligence held by agencies and provide holistic support for adults at risk of harm, including exploitation.

Produced by a multi-agency group, The Tiered Risk Assessment and Management Protocol is designed to support cases involving exploitation where the activity appears consensual and where the adult is deemed to have capacity, or fluctuating capacity, to make decisions.

The protocol includes advice about **when and how** to escalate risk into a multi-agency setting, as well as **how to run shared risk management processes** that balance positive risk taking with an individual's human rights. A summary of the Protocol can be found [here](#).

3. Place Based Working

This strategy recognises that support for victims and those at risk of exploitation is only part of the solution. An effective local response also involves measures to prevent and disrupt exploitation through the sharing of multi-agency intelligence and effective engagement with communities at the local level.

Through Oldham's five neighbourhood Cluster Teams and Primary Care Networks, each locality offers a tailored response to exploitation that reflects the different prevalence, populations, and inequalities of each area. Examples include public health campaigns designed to signpost people to local warm, safe spaces, and Operation Helix, a project led the Failsworth and Hollinwood Neighbourhood Policing Team and Council's Community Safety Team designed to prevent organised and violent crime.

4. Strengths Based Working and ACEs

Oldham's approach to tackling complex safeguarding and exploitation is underpinned by trauma informed practice and strengths-based working. Through multi-agency training, professionals work with adolescents and adults at risk of exploitation by focusing on their histories and understanding what is working well in their lives. The aim is to identify strengths and positive influences and help develop life skills to manage challenging and risky situations.

This approach recognises that adversity and childhood trauma can make some adolescents particularly vulnerable to exploitation. Adverse Childhood Experiences (ACEs) are traumatic events that occur in childhood and can include violence, abuse, and/or growing up in a family with mental health or substance use problems. Learning from local SARs shows that therapeutic interventions to support ACEs and recovery are often limited. This is important because unresolved trauma can impact on decision making as an adult and increase risk taking.

Oldham Safeguarding Adults Board is developing multi-agency training that combines strengths-based working and trauma informed practice to help empower individuals to make informed choices and take control of their situation.

Opportunities for Future Development

Following publication of the Greater Manchester Independent Review into the Effectiveness of Multi-agency Responses to Child Sexual Exploitation, agencies in Oldham came together to consider the findings and listen to the feedback from victims and survivors supported by the local charity, Keeping Our Girls Safe.

Whilst the review findings focus on sexual abuse and organised crime, the recommended next steps identified by local partners are relevant to **all forms** of exploitation in Oldham. The following sets out the key areas for future development identified by local partners at the joint children's and adults Safeguarding Assurance event held in September 2022:

- 1. Governance** – there is a lot of good work happening locally to tackle exploitation but a recognition that some of this is happening in silo. Strategic and operation governance arrangements could be strengthened by aligning the work of the joint Complex and Contextual Safeguarding Subgroup, the Multi-Agency Victim Forum (MAVF) and Operation Sherwood. Governance arrangements could also benefit from more inclusive, open, and honest conversations involving adults with lived experience and wider third sector partners.
- 2. Complex Safeguarding Hub** – the work of the Hub provides an effective holistic response to tackling exploitation. Officially it accepts referrals for young people up to the age of 18 and informally accepts referrals up to the age of 25. Current arrangements could be strengthened by including adult social workers within the hub and formally extending referral pathways into the service for young adults aged between 18 to 25.
- 3. Training and workforce development** – Oldham's report into child sexual exploitation highlights the link between the use of victim blaming language and the way services respond. It also highlights the grey area of coercion and consent for young adults aged between 16 and 18. Multi-agency training to identify and understand professional bias could help to improve the experiences and outcomes for victims and survivors.
- 4. Data and Intelligence** – agencies recognised that data is collected and reviewed in isolation by different services across the system. Further improvements include increasing the range of data collected to provide a single picture of the scale, prevalence, and characteristics of exploitation in Oldham. In addition, intelligence should be routinely reviewed as part of the governance process to inform both strategic and operational responses.
- 5. Prevention** – compared to enforcement and victim-response partners felt that more work was needed to set out Oldham's prevention offer (currently rated as 4 out of 10). Further improvements require the active involvement of third sector partners to co-design Oldham's prevention offer, including a programme of community conversations.

Priorities for 2022-2024

PRIORITIES		WHAT WILL WE DO?
01	Strengthen governance and accountability	<ul style="list-style-type: none"> Review the TOR for the joint Complex and Contextual Safeguarding Subgroup, including reporting and information sharing arrangements with relevant operational subgroups, such as the Complex Safeguarding Hub. Align strategic and operational work programmes as part of Oldham’s all age approach to tackling Complex Safeguarding and Exploitation.
02	Good quality support for victims and their families	<ul style="list-style-type: none"> Extend the age limit of the Complex Safeguarding Hub to include young adults up to the age of 25. Practitioners and adults with lived experience to co-design service pathways for adults aged 25 and over at risk of exploitation Roll out training for professionals on exploitation to include trauma informed practice and professional bias.
03	Ensure consistent practice across the system	<ul style="list-style-type: none"> Review the impact new TRAM Protocol for medium and high-risk cases involving exploitation. Produce practitioner guidance and referral pathways for each category of Modern Slavery.
04	Review disruption and Offender Management processes	<ul style="list-style-type: none"> Expand the sources of data collection as part of a quarterly Children’s, Adults and Community Safety intelligence dashboard. Work with Talk Listen Change and the National Probation Service to understand the motivations and contextual issues facing perpetrators and the impact of offender management programmes.
05	Listen and respond to Lived Experience	<ul style="list-style-type: none"> Develop the cultural competency of professionals to support cross cultural conversations. Capture the experience of practitioners working cases to identify best practice and understand the challenges they face. Capture lived experience from victims and survivors to review Oldham’s response to exploitation.
06	Prioritise prevention and early identification	<ul style="list-style-type: none"> Develop an engagement programme to work with local communities to help understand the barriers to reporting concerns. In partnership with local community and faith groups, design and launch a communications campaign for individuals, families, and communities about the signs of exploitation and how to report a concern.

Governance Arrangements

Strategic oversight and assurance of Oldham's response to Complex Safeguarding and Exploitation is provided by the joint children's and adults Complex and Contextual Safeguarding Subgroup. This multi-agency subgroup reports directly to the children's and adults safeguarding partnerships as well as Oldham's Community Safety Partnership. The Subgroup also links with separate governance frameworks for safeguarding people at risk of being drawn into terrorism, or extremism leading to terrorism.

The Subgroup will be responsible for implementing the priorities within this strategy and the production of an annual report setting out data on the forms of exploitation, prevalence and the actions taken by local agencies to safeguard people in Oldham. The report will act as a benchmark to monitor the impact of Oldham's response and compare prevalence across Greater Manchester.

This Strategy is one of three delivery plans designed to implement Oldham's All Age approach to Complex Safeguarding and Exploitation and should be read in conjunction with:

- [Oldham's Contextual Approach to Complex-Safeguarding Strategy 2020-2023 for Children and Young People](#)
- [Oldham's Complex Safeguarding Hub operating procedure](#)
- [Oldham's policy and procedures for safeguarding people at risk of being drawn into terrorism, or extremism leading to terrorism](#)

Members of Oldham's Safeguarding and Community Safety Partnerships are committed to working with survivors, local communities, and perpetrators to tackle the exploitation of young people and adults in Oldham. In the recent Safeguarding and Sexual Exploitation Assurance event partners acknowledged that this would involve challenging and often uncomfortable conversations, but partners are committed to do more to protect those who are currently being exploited or who are at risk of being exploited in the future.

What to do if you are worried about an adult

If you think someone you know is experiencing or is at risk of being exploited, and they are not able to protect themselves then please report it.

The Oldham **Adult Referral Contact Centre (ARCC)** has been set up to help adults and families looking for support and can be contacted via the following email address: ARCC@oldham.gov.uk

In addition, the Oldham **Multi-Agency Safeguarding Hub (MASH)** has been set up to help people who want to report a safeguarding concern. Both services can be contacted on the following number:



**ARCC and MASH:
0161 770 7777**

Radicalisation

You can also use this number if you are concerned that someone you know is being groomed and/or exploited to take part in terrorism or extremist activities.

Contact Us

If you have any queries about this strategy or would like more information, please contact the Oldham Safeguarding Adults Board Business Unit at:



**Oldham
Safeguarding
AdultsBoard
@oldham.gov.uk**

Please also follow us on Twitter and share our content to raise awareness of safeguarding and exploitation and what people can do to keep them and their families and friends safe in Oldham:



Glossary of Terms

Coercive behaviour	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. This definition is an umbrella term that includes so called ‘honour’ based violence, female genital mutilation (FGM) and forced marriage, and victims are not confined to one gender or ethnic group.
Controlling behaviour	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.
County Lines	Organised criminal activity in which illegal drug dealers in major cities establish networks for the supply and sale of drugs to users in towns and rural areas. Typically involves using other people (those who are young or otherwise vulnerable) to carry, store, and sell the drugs.
Cuckooing	Term used when an individual or a criminal gang target the home of a vulnerable person so they can use the property for criminal purposes such as drug-dealing, hiding weapons and other criminal activities. Criminals often befriend a vulnerable person in order to exploit them and use their property.
Domestic abuse	Any incident of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of their gender or sexuality.
Financial exploitation	When someone is deceived or coerced into handing over monetary funds, assets or property. Financial exploitation often involves the targeting of a vulnerable person and can happen through fraud, including wills or inheritance, blackmail, accumulating debts, or having money or property stolen – this includes situations where someone feels pressured into handing over money or property.
Honour based violence	So-called ‘honour-based violence’ can take many forms; it is used to control behaviour within families to protect perceived cultural and religious beliefs and/or honour. Examples may include murder, fear of or actual forced marriage, domestic violence, sexual abuse, false imprisonment, threats to kill, assault, harassment and forced abortion. Women are predominantly (but not exclusively) the alleged victims and the violence can include collusion from wider family members and/or the community.
Modern day slavery	Umbrella term for all forms of slavery, human trafficking and exploitation. It is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after. Recent cases have seen the targeting of people with a learning disability, homeless people and family members brought to the UK as refugees.
Sexual abuse	Indecent exposure, sexual harassment, inappropriate looking or touching, actual or threatened rape, sexual photography, subjection to pornography or witnessing sexual acts or sexual acts to which the person has not consented. Also includes being pressured into consenting under unequal or coercive conditions.
Sexual exploitation	Actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. It can include taking sexual advantage of another person without effective consent; causing the prostitution of another person; recording, photographing or transmitting identifiable images of private sexual activity of another person.