

<b>Title:</b> <b>Children at risk of sexual exploitation</b>			
<b>Authors Name: Sue Little</b>			
<b>Contact Name: Sue Little</b>			
<b>Contact ; Safeguarding Children Unit</b>			
<b>Departments/Groups This Document Applies to: ALL partner agencies</b>			
<b>Scope: All Partner Agencies in Salford</b>		<b>Classification: SSCB Policy</b>	
<b>Keywords: Child Protection, Neglect, Abuse, Referral, missing from home, police</b>		<b>Replaces: NONE</b>	
<b>To be read in conjunction with the following documents:</b> Abuse and Neglect Recognition referral and response			
<b>Unique Identifier: SSCB/0007</b>		<b>Review Date: January 2013</b>	
<b>Issue Status: CURRNET</b>		<b>Issue No: 1</b>	<b>Issue Date: December 2010</b>
<b>Authorised by: SSCB Executive</b>		<b>Authorisation Date: January 2011</b>	
<b>Document for Public Display: Yes</b>			
<b>After this document is withdrawn from use it must be kept in an archive for 10 years.</b>			
<b>Archive:</b>		<b>Date added to Archive:</b>	
<b>Officer responsible for archive:</b>			

For more detailed guidance see:

- Safeguarding Children Involved in Prostitution: Supplementary Guidance to Working Together to Safeguard Children
- The 'Chief Constables Order (Greater Manchester Police) – Issue 98/50 – 15 December 1998 – Child Prostitution', which details the police policy regarding this issue.
- Sexual Offences Act 2003 (need to ensure it specifically sites the new offence of commercial exploitation of a child as per NSF p 162)

## 1. INTRODUCTION

Prostitution in the UK and elsewhere frequently involves women, men and children in a world of organised crime, including violence, drugs or pornography.

Although not always prominent or visible, children and young people who are the victims of sexual abuse, through their exploitation in child prostitution, are unfortunately a part of the culture in which we live. Prostitution exposes children to abuse and assault and may even threaten their lives. Children do not voluntarily enter prostitution, they are coerced, enticed or are utterly desperate.

Staff in all agencies, and in particular, health professionals, school staff, social care staff and youth workers are in a key position to identify children who are at risk of, or are being abused through, prostitution or other forms of sexual exploitation. Staff need to take action to safeguard them and to ensure that they are supported to achieve a lifestyle appropriate to their age and stage of development.

In Salford all agencies have a policy of 'zero tolerance' and will work pro-actively to eradicate child prostitution through the successful prosecution of all perpetrators and by using every method to prevent children's' involvement.

It is further recognised that the situation of such children and young people can only be safeguarded by a multi-agency approach to prosecute the perpetrators, whilst working positively to protect the victims.

## 2. DEFINITION

The sexual exploitation of a child is defined by The United Nations as:

'The use of children for the sexual gratification of adults. The basis of the exploitation is the unequal power and economic

Issue [1] [Jan 2011]	Children at risk of Sexual Exploitation <b>Current Version is held on the Intranet</b> Check with Intranet that this printed copy is the latest issue	Page 2 of 23
-------------------------	---	--------------

relations between the child and the adult. The child is exploited for his/her youth and sexuality’.

Children and young people under the age of 16 years, regardless of gender, cannot, by law, consent to sexual activity. Whilst they may legally give consent to sex over the age of 16 years, they may still be vulnerable.

In determining risk of exploitation it is essential to consider issues of power and control. Imbalances of power can be present even where young people are agreeing to activity. They can occur through differences in size, age, stage of development, position of trust and/or authority and where gender, sexuality, race and levels of sexual knowledge are used to exert such power. Eg a 15 year old girl and 35 year old man or a 15 year old girl with learning difficulties and a 17year old youth.

**All** children and young people who are thought to be at risk of sexual exploitation will be deemed a child in need and an assessment of their needs will be undertaken and as such **MUST** be referred to the Duty Social Worker in the Referral Investigation and Assessment Team (RIAT) or the Emergency Duty Team.

In order to determine whether the relationship presents a risk to the young person, the following factors should be considered:

- Whether the young person is competent to understand, and consent to, the sexual activity they are involved in.
- The nature of the relationship between those involved, particularly if there are issues of power imbalances as outlines above.
- Whether overt aggression, threats, coercion or bribery was involved including misuse of substances as a disinhibitor.
- Whether the young person’s own behaviour, for example through misuse of substances, places them in a position where they are unable to make an informed choice about the activity. Note this can render an otherwise assertive young person vulnerable to exploitation.
- Any attempts to secure secrecy by the sexual partner beyond what would be considered usual in a teenage relationship. Consider the young persons relationships with family and friends, have they deteriorated since meeting this partner? Does the young person have a healthy support network?

- Whether the sexual partner is known by the agency as having other concerning relationships with similar young people. Is there a pattern emerging?
- Whether the young person denies, minimises or accepts concerns.
- Whether methods used to secure compliance and/or secrecy by the sexual partner are consistent with behaviours considered to be 'grooming' as per sexual exploitation. Note the young persons stated compliance with the relationship should not be taken as evidence that grooming is not taking place.

### 3. AIM

This policy is designed to:-

- Formalise the exchange of information between Children's Services, the Police, and all agencies working with children and young people where children are at risk of sexual exploitation.
- Aid investigations into individuals who sexually exploit, abuse or procure children and young people for prostitution and control that activity.
- Aid the implementation of positive prevention, protection and re-integration strategies for children abused through prostitution.

By:

- early identification of potential risk or initial abuse through sexual exploitation
- prompt consistent and effective responses to the child involved
- working in partnership with other agencies and exchanging information to ensure a pro-active approach to prosecution of coercers/abusers

### 4. PRINCIPLES

- The welfare of the child or young person will always be the paramount importance.
- A young person under 18 years being sexually exploited will be treated primarily as the victim of abuse and a

Issue [1] [Jan 2011]	Children at risk of Sexual Exploitation <b>Current Version is held on the Intranet</b> Check with Intranet that this printed copy is the latest issue	Page 4 of 23
-------------------------	---	--------------

multi-agency assessment of need will be undertaken to determine a plan for the provision of appropriate services and/or protection.

- The child or young person's assessment of need may, but will not automatically, require a Child Protection Enquiry.
- The criminal process will concentrate on attempting to prosecute those who are suspected of procuring and controlling the prostitution of children and young people.
- Priority will be given to the protection of a child or young person over a decision to prosecute him or her. Occasionally, consideration will need to be given to prosecuting a child or young person who persistently returns to prostitution as a means of protecting the child. This would only occur as a result of a recommendation from a multi-agency meeting (Family Action Meeting or Child Protection Case Conference).

It is essential that all agencies work together to protect and promote the welfare of children and young people.

The Police, as investigators, will have information which will assist meetings in the implementation and review of child care or protection plans.

The Children's Services and other agencies working with children and young people will have information which will assist Police investigations. This may enable the prosecution of those who encourage and control child prostitution or abuse children.

Other agencies will be engaged in supportive activity with the child or young person and family and will be invaluable to the process of re-integrating them into positive, age-appropriate lifestyles.

## 5. LEGISLATIVE FRAMEWORK

The *Sexual Offences Act 2003* aims to protect the safety and rights of young people and to make it easier to prosecute people who pressure or force others into sexual activity.

Although the age of consent remains at 16, it is not intended that the law should be used to prosecute mutually agreed teenage sexual activity between two young people of similar age, unless it involves abuse or exploitation.

### Young People Under the Age of 13 years

Issue [1] [Jan 2011]	Children at risk of Sexual Exploitation <b>Current Version is held on the Intranet</b> Check with Intranet that this printed copy is the latest issue	Page 5 of 23
-------------------------	---	--------------

In all cases where the sexually active young person is under 13 years and there are concerns of exploitation there must be consultation with the Team Manager of the Duty and Investigation Team, including disclosure of the personal details of both parties.

### **Young People Between 13 – 16 years**

The Sexual Offences Act 2003 reinforces that, whilst mutually agreed, non-exploitative sexual activity between teenagers does take place and that often no harm comes of it, the age of consent should still remain at 16. This acknowledges that this group of young people is still vulnerable, even when they do not view themselves as such. Sexually active young people in this age group will still have to have their needs assessed using this protocol. Discussion with Children's Services is not mandatory and will depend on the level of risk/need assessed by those working with the young person. The same considerations as to making a criminal complaint apply as set out above, e.g. a 14 year old and a 25 year old man.

This difference in procedure reflects the position that, whilst sexual activity under 16 remains illegal, young people under the age of 13 are deemed unable to consent to such sexual activity.

### **Young people Between 16 – 18 years**

Although consensual sexual activity itself is not an offence between young persons over the age of 16, it is an offence to pay for the services, or cause or incite a young person, under the age of 18 years, into prostitution (Sections 47, 48, 49 and 50 of the Sexual Offences Act 2003 refer). Young people, under the age of 18, are also offered the protection of Child Protection Procedures under the Children Act 1989. Young people, of course, can still be subject to offences of rape and assault and the circumstances of an incident may need to be explored with a young person. Young people over the age of 16 and under the age of 18 are not deemed able to give consent if the sexual activity is with an adult in a position of trust or a family member as defined by the Sexual Offences Act 2003. Any girl, either under or over the age of 13, who is pregnant should be offered specialist support and guidance by the relevant services. These services will also be a part of the assessment of the girl's circumstances.

Department of Health Guidance "Safeguarding Children Involved in Prostitution" establishes that the law must primarily be used against the abusers and coercers of children/young people involved in prostitution, who should be accountable for their abusive behaviour.

There is a range of offences to tackle exploitation of children through prostitution, relating to coercion, procurement, running a brothel or living on immoral earnings. Additionally there may be other offences relating

to the sexual, physical or emotional abuse of children. **The most serious charges that can be brought should always be used.**

Offences relating to the sexual abuse of children may involve other offences such as abduction, kidnapping, drug offences, tax evasion or social security fraud.

In dealing with children abused through sexual exploitation the emphasis should be on preventing their entry into prostitution, to protect them from further abuse and to support them out of prostitution. However, criminal justice action may be considered by the police, following inter agency discussion within LSCB guidelines, where all attempts have failed, and where children and young people persistently continue in prostitution.

## 6. INDICATORS OF CHILDREN AT RISK OF SEXUAL EXPLOITATION THROUGH PROSTITUTION

There are factors which may lead children to become more vulnerable to sexual abuse in the form of prostitution, e.g.:-

- Homelessness can lead to children turning to prostitution as a method of survival – they may sell sex in exchange for a bed for the night or food.
- Financial necessity, especially when combined with homelessness, can play a large part in prostitution.
- Drug and alcohol misuse – children may be lured into prostitution to pay for a drug or alcohol habit. They may have been introduced to drugs/alcohol by a boyfriend/coercer (pimp) in order to disinhibit them initially in order to subject them to the abuse of prostitution.
- Experience of previous abuse.
- Estrangement from family.
- Low self esteem.
- Children in care may be especially vulnerable because of a number of factors, which could include a history of previous abuse, low self esteem, searching for a loving relationship, being targeted by sex offenders and the prevalence of running away.

## 7. RISKS

- Children abused through any form of sexual exploitation face immense risks to their physical, emotional and psychological health. The environment in which prostitution is located tends to have close links with criminal behaviour, drug and alcohol misuse and violence. Children drawn into this kind of sexual abuse therefore become exposed to these added risks.
- There has been a higher incidence of murder associated with prostitution than in the case in the general population and children also become more vulnerable to other violent acts such as rape, physical and sexual assaults and coercion into pornography. Their physical health is placed at risk through the increased likelihood of contracting sexually transmitted infections including HIV and AIDS.
- Other risk factors are common to child sexual abuse generally and can include physical injuries, non school attendance and/or underachievement, depression, self-mutilation and attempted or completed suicide.
- The risks to children from abuse through prostitution can be seen to be extremely high, can be life threatening and therefore, must be considered as a child protection issue.

In order to aid practitioners to assess the level of concern it may be useful to consider, alongside issues outlined in point 2, the following three categories of risk:-

### **Category 1 : At Risk**

Running away from home or care with prolonged periods of truanting from school and going missing. Beginning to engage in emotional and sexual relationships with older, abusive and/or violent men.

### **Category 2 : Swapping Sex**

Category 1 but with increasing engagement in intense sexual and emotional relationships with older violent men, with increasing misuse of alcohol and drugs, swapping sex for affection, money, drugs, accommodation or other returns `in kind`.

### **Category 3 : Selling Sex**

Spending extended periods of time on the street, living in temporary accommodations or being homeless, selling sex and intermittently identifying as working in `prostitution`.

Issue [1] [Jan 2011]	Children at risk of Sexual Exploitation <b>Current Version is held on the Intranet</b> Check with Intranet that this printed copy is the latest issue	Page 8 of 23
-------------------------	---	--------------

'Its someone taking a part of you'. Pearce, Williams + Galvin (2002)  
NCB

## 8. PROCEDURE

### A) IMMEDIATE PROTECTION (exceptional circumstances)

In the majority of cases, immediate protection will not be necessary as the child's life is not under threat. In most cases it will be possible to plan the enquiries/investigation, and this must be done in conjunction with other organisations where appropriate.

If the Children's Services or the Police receive information, which indicates a young person's life is at risk or the young person is likely to suffer significant harm, the immediate safety of the young person should be secured. This would entail returning the young person home or to a place of safety on a voluntary basis, but may require the use of Police Protection, an Emergency Protection Order (EPO), or other legal intervention.

Should Police Protection or an Emergency Protection Order be taken then it will always be necessary to consider undertaking a S47 enquiry/investigation. If a decision is taken not to pursue a S47 Enquiry/Investigation the reasons must be clearly recorded.

A strategy meeting must be convened at the outset of the Section 47 enquiry/investigation involving Children's Services, the Police and other relevant agencies. This meeting will decide which staff will be involved in undertaking the Section 47 enquiry/investigation and assessment of the level of risk to the child or young person.

Responsibility to ensure that such immediate action is taken rests with the Authority where the child is found following the incident, regardless of where the child is ordinarily resident.

If the child normally resides outside the Authority where the child is found, they will subsequently need to liaise with the Authority where the child is ordinarily resident and determine who therefore has responsibility for their welfare and protection.

If the child is subject of a Child Protection Plan (formerly the Child Protection Register), or 'Looked After,' by another Authority, the Authority where the child is found will involve the Authority responsible for the child. The first Authority is absolved from responsibility to take action **only** when the second Authority has accepted responsibility.

Issue [1] [Jan 2011]	Children at risk of Sexual Exploitation <b>Current Version is held on the Intranet</b> Check with Intranet that this printed copy is the latest issue	Page 9 of 23
-------------------------	---	--------------

## **B) ENQUIRIES/INVESTIGATION**

The enquiries/investigation of abuse requires a sensitivity to the young person's feelings, wishes and circumstances, taking into consideration age, ethnic origin, religious and cultural background, gender and specific needs.

It is important to keep the number of times a young person is asked for a personal account of his/her experiences to a minimum. It may be that the young person presents as being hostile and unreceptive, denying involvement and giving false identity.

Parents should be kept informed, consulted and involved at the earliest opportunity (following a risk assessment) unless there are clear early indications that it would not be safe for the child or other to do so. If there are concerns about sharing information as to the whereabouts of the young person, parents should be informed that the young person has been found and reassurances given about their health, etc, if appropriate. For young people aged 16 – 18 years their consent should be requested prior to information being shared with parents.

Close co-operation between all agencies involved in the young person's welfare is essential for their effective protection. The Police, Children's Services and other key organisations should plan the enquiries/ investigation and work together to address both the victim's needs and to encourage a proactive approach to the prosecution of the perpetrator(s) or coercers.

There are a number of stages to the enquiry/investigation.

## **C) CONSULTATION**

When a child/young person is identified by an agency as being at risk of abuse through prostitution, but where there is no evidence, the agency with the concern will consult with the Child Protection Unit. This will be necessary to ensure that any information in respect of associated children/young people or perpetrators is not overlooked and that a central record is kept of concerns to develop a complete picture across the borough.

If, following consultation, it is deemed necessary for Children's Services to become involved in the assessment of need, the relevant Children's Services team will be contacted by the CPU to discuss the situation.

## **D) REFERRAL.**

It is important to take as many details as possible from the referrer and to make enquiries of other agencies who might have

Issue [1] [Jan 2011]	Children at risk of Sexual Exploitation <b>Current Version is held on the Intranet</b> Check with Intranet that this printed copy is the latest issue	Page 10 of 23
-------------------------	---	------------------

relevant information. Staff making the referral should complete a Common Assessment Framework Form, this must be received within 48 hours of making the telephone referral.

Children's Services must decide on its course of action within 24 hours of receiving the referral and acknowledge receipt of the referral within one working day. If an acknowledgement is not received within 3 working days, it is the duty of the referrer to follow this up. This initial assessment will address, on the basis of available information, whether there are concerns about impairment to the child's health and development (including actual and/or potential harm), which justifies further enquiries, assessment or intervention. If so, Children's Services have 7 days to complete the Initial Assessment (Assessment Framework), which may determine the need for a S47 enquiry/investigation.

## **E) INTERVIEWS**

Interviews with the young person, other young people, parents, alleged perpetrator will be in accordance with Salford's Local Safeguarding Children's Board Procedures and 'Achieving Best Evidence' Guidance. Accurate notes must be taken before, during and after the interview as these may be requested in any criminal trials.

In addition to the overarching assessment framework, consideration of issues identified in point 10 below should be considered.

## **F) MEDICAL EXAMINATION**

Consideration should be given to the needs and/or wishes of the child to be medically examined. This may be where it is apparent that they need medical treatment and/or where forensic evidence needs to be collected, or the young person may be concerned about their health. The medical examination should be conducted by a Police surgeon with appropriate training. The consent of the child/young person will of course be required in all circumstances. Where a young person does not wish to be examined for the purposes of a Police investigation, they can still access the services of the Sexual Referral Centre (St Mary's), on a self referral basis.

The initial assessment will be carried out within seven working days.

The relevant team manager will contact the chair of the multi-agency forum or another member in his/her absence to arrange for a strategy meeting to be convened to plan the initial assessment. Consideration will be given to the involvement of

parents and the child/young person at all stages of the assessment process.

If the initial assessment does not confirm the initial concerns the referral will be closed.

If the initial assessment reinforces concerns then, depending on the assessed level of risk, either a Child Protection Conference or a multi-agency Family Action Meeting will be convened within 10 working days to determine the best way forward in completing a core assessment and to identify appropriate support services.

Other agencies/teams to be involved if child is over 16 years:-

- Youth Offending Service/YISP
- Children's Services Team completing assessment and any other service area which may be able to share information or offer services
- Police
- School
- Health
- SMART Team (if the child/young person is misusing substances)
- Locality Team
- Connexions
- Youth Service

The meeting will identify those individuals and organisations who have a particular contribution to make to a multi-agency assessment as outlined below.

A further meeting will be convened within six weeks (following the completion of the core assessment) which will either take the form of a Family Action review or a Child Protection Conference.

An Initial Child Protection Conference will be called if there are circumstances where the parent is knowingly failing to protect their child/young person, actively encouraging the prostitution or where there are other significant risk issues.

## 9. RECORDING INFORMATION

Care should be taken in recording information in case notes as this could influence the outcome of any potential prosecution against an

Issue [1] [Jan 2011]	Children at risk of Sexual Exploitation <b>Current Version is held on the Intranet</b> Check with Intranet that this printed copy is the latest issue	Page 12 of 23
-------------------------	---	------------------

adult. Staff need to be aware that records could be used in evidence in a criminal prosecution.

## 10. MULTI-AGENCY ASSESSMENT

A comprehensive assessment of need should include the following areas:-

- Age and level of maturity of child/young person
- Age and level of maturity of any other participants
- Attitude and impact of parents
- The role of carers and significant 'others' in the child/young person's life
- Is the relationship exploitative and if so, who is exploiting whom and are there elements of coercion?
- Where is the sexual activity taking place?
- Is payment or other reward offered or sought, and if so, by whom?
- The location in which the sexual activity takes place
- The child/young person's perception and interpretation of their involvement
- The physical acts which have taken place and the role of each participant in them
- Actual physical effects
- Possible physical effects
- Actual emotional effects
- Likely emotional effects
- Attention needs to be given to the child/young person's willingness to conform to safe boundaries
- The likely response of parents and other significant adults in the child/young person's cultural framework
- Attitude of peers
- Response of school, police, etc

- Any historical information related to the extended family
- What factors are maintaining the lifestyle?
- Are there issues related to drugs/alcohol?
- Identify strengths in the life of the child/young person that could be promoted to encourage change
- A chronology of the child/young person's life

The information collated from this assessment should facilitate an analysis of the child/young person's abuse through prostitution.

Where appropriate, agencies will continue to work together to support the child/young person using the Family Action Model guidance to plan and review progress.

## 11. ADMISSION TO ACCOMMODATION

The available evidence suggests that admission to Local Authority accommodation is unlikely to break an established pattern of prostitution on its own. However, where a decision is taken regarding accommodation, the following additional factors should be taken into account:-

- The length of time the child/young person has been abused through prostitution
- The frequency of importuning (soliciting)
- The need for protection which cannot be provided elsewhere
- The child/young person's motive for involvement in prostitution and their understanding of this
- The nature of the specific sexual activities and the degree of risk of infection or injury
- The resources available, the likely effect on other residents of the admission, and the likely response of the residents to the child/young person.
- Level of substance misuse.

## 12. PRACTICE GUIDANCE FOR STAFF AND CARERS RESPONDING TO CHILDREN AND YOUNG PEOPLE EXPLOITED THROUGH PROSTITUTION

It is important to avoid seeing involvement in prostitution as something which sets a child apart from the rules and routines of normal life. Every effort should be made to give the child a safe home base with a standard of care which reinforces his/her self-respect.

The actions of carers and staff must be guided by the child's best interests at all times and should make every effort to reinforce the child's positive behaviour and divert them from damaging behaviour such as prostitution.

While the child's behaviour and attitude may on occasion present difficulties to staff and carers, they must avoid any rejection of the child or use of sexual innuendo or sexist terminology.

The involvement of children in prostitution can naturally evoke strong feelings. These can include anger and revulsion. It can also lead carers and staff to transfer these negative feelings towards the child. Carers and staff will need to remain aware of their own reactions to the child and the activity.

Staff will need to raise such feelings with their line manager or supervisor who should provide appropriate support and guidance. The subject should also be addressed within staff meetings and unit training events.

The child's social worker and the foster family placement worker should offer guidance and support to foster carers when needed. Residential social workers may also have a support role in some circumstances.

Staff caring for the child, or coming into contact with him or her, should be aware of the implications of their own behaviour and language.

Whether or not a member of staff appears to have authority, that a person's gender and race, and even size and how the person dresses may influence the positive or negative feelings which a child may have towards him or her, especially before working relationships are established.

Staff and carers will need to be sensitive to the emotional impact on the child as a result of the sexual activity. Children may react in different ways ranging from self-harm and low self-esteem, to apparent unconcern or presenting in a powerful or controlling way.

Children exploited through prostitution or felt to be at immediate risk of involvement should be offered a suitable programme of counselling covering health care, safer sex and self-esteem. Consideration should be given to who is the most appropriate person to offer counselling.

### 13. ADDITIONAL GUIDANCE FOR STAFF IN RESIDENTIAL ESTABLISHMENTS

If residential staff have suspicions that children/young people may be involved in prostitution these must be discussed with the head of establishment/ service manager and field social worker.

In agreement with the head of establishment/ service manager, staff should take preventative steps such as:-

- offering advice about the importance of safe sex;
- offering advice regarding appropriate clothing;
- trying to persuade children/ young people from leaving the establishment;
- if they do leave, offering sensitive and welcoming responses on their return;
- ensuring children/ young people are aware of the health and legal issues involved.
- ensuring children/ young people are provided with information on services that can support and help them including voluntary services.

There may be some circumstances where residential staff would want to monitor visitors to the establishment or letters and telephone calls received. In some circumstances it may be appropriate to turn visitors away or notify police of their presence.

In consultation with the child/ young person and head of establishment/service manager and, where appropriate, the child/young persons parents a decision may be made to monitor some telephone calls and letters received. This may include being present when calls are received or letters opened and in some circumstances may mean that calls and letters are not passed on to a child/ young person.

Any decision to withhold telephone calls, letters or to turn visitors away is clearly recorded including which calls, letters, visitors are being restricted and why.

## REFERENCES

'Its someone taking a part of you' A study of young women and sexual exploitation. Pearce, Williams + Galvin (2002) NCB

**October 2005**





Record of Changes to Document					
Changes approved in this document by - SSCB Policies and Procedures Sub Group					
Section Number	Date	Amendment ( <i>shown in bold italics</i> )	Deletion	Addition	Reason

## Diversity & Equality Screening Questionnaire

Organisations are legally required to ensure that all new policies and documents are assessed for their impact both positive & negative on equality target groups ; religion/beliefs, disability, age, gender, religion & sexual orientation & transgender.

If you wish to discuss any aspect of this assessment process please contact the Equality Advisor, HR dept.

Name of policy, document or leaflet;	
1	Whom is this document or policy aimed at ?
2	Is this document a specific user group? if yes, why ? (what are the demographics of your target audience?)  How will you ensure that this policy is cascaded to the target group ?
3	Is there any evidence to suggest that different groups have different needs in relation to this policy or document (positive or negative; for example; elderly, patients with disabilities, issues on gender etc) ?
4	If you are revising a policy are any the changes to this policy likely to impact on any groups?
5	Have you undertaken any consultation/involvement with service users or other groups in relation to the new policy ?  If yes, what format did this take? face/face or questionnaire? (please attach evidence of this)  Were service users who may require additional support (e.g. visually impaired) involved ?  Has any amendments been implemented as a result of this

<b>exercise?</b>			
<b>6</b>	<b>Are you aware if a request has been made for the policy to provided in alternative formats?</b>		
	<b>If yes, how/was this achieved?</b>		
<b>7</b>	<b>Does the document require any decision to be made which could result in some individuals receiving different treatment, care, outcomes to other individuals (could any group be excluded for any reason)?</b>		
	<b>On what basis would this decision be made ?</b>		
	<b>Could this impact on any particular group ?</b>		
<b>8</b>	<b>Are you aware of any complaints from service users in relation to the application of this policy ?</b>		
	<b>If yes, how was the issue resolved ?</b>		
<b>9</b>	<b>Looking at the above points does this indicate that any of the groups listed below have different needs, experiences or priorities groups in relation to the document ?</b>		
	Yes	No	unsure
<b>Age</b>			
<b>Disability</b>			
<b>Gender</b>			
<b>Marital Status</b>			
<b>Racial group</b>			
<b>Religious belief</b>			
<b>Sexual orientation</b>			
<b>Transgender</b>			
<b>Low Income</b>			
<b>10</b>	<b>Any additional comments</b>		
	If any impact has been highlighted by this assessment, you will need to undertake a full equality impact assessment:		
	<b>Will this policy require a full impact assessment? Yes/No (delete)</b> (if yes please contact Equality Advisor, HR for further guidance)		

