

Reference: 2026-011

Thank you for your email in which you requested the following information under the Freedom of Information Act 2000 (FOIA):

I request access to a copy of the Serious Fraud Office's current policies and procedures related to anti-slavery, human or data or identity trafficking, and modern slavery.

Specifically, I would like to request the following information:

- 1. The official anti-slavery and human trafficking policies adopted by the Serious Fraud Office.**
- 2. Any guidelines or procedures for identifying and addressing slavery or both trafficking within the scope of your operations.**
- 3. Any related training or awareness materials provided to staff.**
- 4. Whistleblowing protections for both employees and members of the public.**

Response

Please see below our response to your questions.

Questions 1 – 3

This information is held. Please see Annex A.

Question 4

Information for whistleblowers, including protections available to both employees and members of the public, is publicly available on GOV.UK: [Information for whistleblowers - GOV.UK](#)

Annex A – Safeguarding Adults Policy and Procedure

Introduction

The SFO has a duty of care to safeguard adults with whom we come into contact with, and who are, or who could be considered at risk from abuse, neglect or harm. An adult at risk can be more vulnerable to abuse from others or be a danger to themselves, and may lack the capacity to identify and protect themselves from that abuse.

The work of the SFO involves contact with members of the public, victims, witnesses, suspects and their wider families and associates. This can include contact with adults at risk and it may be necessary to take action to safeguard them.

This policy does not directly address safeguarding children because the nature of our work is such that they rarely, if ever, feature in an SFO investigation or prosecution. Any safeguarding concerns about a child should be treated as an immediate risk (see section on immediate risk) and escalated without delay.

Scope

All staff across the SFO must comply with this Safeguarding Adults Policy and Procedure if they are concerned or suspect that a vulnerable adult is being abused or is at risk of being abused. It also applies to vulnerable adults who are making threats of suicide or expressing ideation of suicide. This document applies in any setting where staff may have direct or indirect contact with a vulnerable adult who needs care and support.

Further advice on any safeguarding concern can be sought from the SFO's Safeguarding Officer.

Definitions

Safeguarding: is a term used to describe protecting adults and children at risk from abuse, neglect and harm. For the SFO this means ensuring that adults who are identified as being at risk are given the opportunity to access the right care and support from those qualified to discharge that care and support.

Adults at risk: Can include those who need care and support because of:

- learning disabilities/difficulties
- mental health problems, for example anxiety or depression
- age and age related conditions requiring care, for example living in a care home
- physical frailties or chronic illness, for example dementia or a brain injury
- alcohol or drug addiction and abuse
- suicidal thoughts, ideation or planning suicide

These characteristics do not always in their own right make an adult vulnerable to abuse. The individual's capacity to understand and make decisions, their environment and support network will impact on the risk.

Capacity to understand: All adults have the right to make their own decisions about risk and protection from that risk, unless their comprehension gives cause to doubt their capacity to understand the risk in line with the relevant provisions of the Mental Capacity Act 2005. This includes the right to make risky choices regardless of how unwise those choices may be.

The works on the principle that everyone is assumed to have capacity to make decisions for themselves if they are given enough information, support and time. It protects their right to make their own decisions and to be involved in any decisions that affect them. A person's capacity must be judged according to the specific decision that needs to be made, and not solely because of their illness, disability, age, appearance or behaviour. An important principle in the law is that just because someone is making what seems to be an unwise decision (even if they have an illness or disability) this does not necessarily mean they lack capacity. There are legal safeguards that must be followed when making a decision on behalf of some who lacks the capacity to make the decision – it must be done in their 'best interest'.

Categories of abuse

List types of abuse as:

1. Financial or material abuse	Including theft, fraud, internet scamming, and coercion in relation to an adult's financial affairs or arrangements.
2. Physical abuse	Injuries or hurt to an individual's body.
3. Neglect and acts of omission	Failure to meet the basic needs of the individual including ignoring medical, emotional or physical care needs.
4. Self-neglect	Neglecting to care for personal hygiene, health or surroundings, including behaviour such as hoarding.
5. Sexual abuse	Becoming involved in sexual relationships or activities that the individual does not want to be involved in. The individual may have said that they do not want to be involved or they may be unable to give consent.
6. Psychological abuse	Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, and cyber bullying, resulting in an individual feeling worthless, unloved or uncared for.
7. Organisational abuse	This happens where services provided are focused on the needs of the organisation. Examples include neglect or poor care practice within an organisation or specific care setting, such as a hospital or care home.
8. Discriminatory abuse	Individuals or groups being treated unequally because of characteristics identified in the Equality Act 2010.
9. Domestic violence or abuse	Any incidents of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are, or have been, intimate partners or family members.
10. Modern Slavery	Encompassing slavery, human trafficking, forced labour and domestic servitude.

Recognising a safeguarding concern

Safeguarding concerns may come to the attention of staff in a number of ways including but not limited to:

- **Observations –**
 - Whilst carrying out an interview or taking a statement from an individual.
 - Whilst taking part in a search of a property.
- **Disclosures –**

- An adult may directly tell you they are being abused.
- An adult discloses self-harm or suicide attempts, ideation or planning.
- An adult may express concerns about contact with suspects.
- **Third parties –**
 - A person associated with the subject may disclose to you they have concerns about the safety and wellbeing of a vulnerable adult.

If a direct disclosure concerning safeguarding is made

- Remain calm and receptive.
- Listen carefully and try not to interrupt.
- Do not press for information but if possible try to get information that will assist in making an effective safeguarding referral.
- Offer reassurance that they are doing the right thing in telling you.
- Take notes if you are able and it is appropriate.
- **Do not** promise or agree to keep the information confidential.
- If you believe it may be necessary to refer the adult at risk to social services or a local support agency, and it is safe to do so, try to obtain their verbal consent for this to happen.
- As soon as possible discuss the concerns with a line manager and/or safeguarding officer.

Discussion with your line manager and/or Safeguarding Officer should identify

- If an immediate safeguarding response is required.
- If more information is needed before an effective referral can be made.
- If the adult has given consent for a safeguarding referral, or if not, whether consent can be obtained or whether the risk enables a referral to be made without consent.
- How to feedback to the adult what action has been taken.
- If a safeguarding referral is not going to be made what actions should be completed to monitor the risk.

Response to a safeguarding risk

Immediate risk

In all circumstances assess whether there is an immediate risk of significant harm. If an adult appears to be in immediate danger or in need of urgent medical attention.

- Contact the emergency services immediately on 999.
- Inform your immediate line manager/safeguarding officer.
- Make a follow up referral to local authority.
- Complete a Safeguarding Incident Report form detailing circumstances, situation and actions taken.
- Inform SCS of decision and action.
- Send the completed form to the safeguarding officer for record. A copy should be retained within the casefile when relevant.

Response to suicide threats and other types of risk

It may be considered to be a safeguarding concern if an adult:

1. Is identified as receiving care and support and discloses any form of abuse or fear of abuse being perpetrated on themselves or others;
2. Makes threats of suicide, self-harm or ideation of suicide; or

3. Demonstrates any concern around their capacity to understand or appreciate the risk to themselves or others.
 - If the risk is immediate then call 999 and follow the instruction above.
 - If the risk is not immediate:
 - Discuss your concerns with your line manager/safeguarding officer. If required seek professional advice from the adult safeguarding team at the relevant local authority.
 - Complete a safeguarding incident report form detailing the circumstances, situation and actions taken, including if the threshold is met/not met for a referral to the local authority.
 - Check whether the adult has consented to make a referral to their local authority
 - Although gaining consent is not always necessary under GDPR/DPA Act 2018, it is considered best practice and in the best interests of the individual to ask if they want to be referred to their Adult Safeguarding authority. Consent should only be sought if it is safe to do so. If there are concerns always refer to your line manager/safeguarding officer for advice.
 - Make a telephone referral to local adult safeguarding team if necessary.
 - Follow up a telephone referral with a written referral if required.
 - Inform SCS of decision and action.
 - Send the completed form to the safeguarding officer for record. A copy should be retained within the casefile when relevant.

If at any point during this process or throughout the investigation concerns remain or increase, a further referral should be made to the Local Authority Adult Services. The referral should reference the original concerns and highlight any new incidents, escalation and further concerns. If a concern escalates to immediate risk always call 999.

Making a safeguarding referral

Every local authority throughout England, Wales, Scotland and Northern Ireland has a system to report adult safeguarding concerns. The contact details for the relevant local authority can be found by searching –

[County/borough/city] name adult safeguarding

There is usually an adult safeguarding telephone number to call and an out-of-hours emergency helpline.

Local authorities may have slightly different ways in which they require referrals to be made. Use the relevant information on their website to make the referral. In the first instance it may be more appropriate to call the helpline number and seek advice from that particular adult safeguarding authority. Follow their advice and instruction. Always inform them you are calling from the SFO, your role, name and how the at risk adult came to your attention.

Information contained in the referral

Referrals to the Local Authority should include where possible the following information:

- Contact details for the adult at risk, the person who raised the concern and for any other relevant individual, specifically carers and next of kin;
- Basic facts, focussing on whether or not the person has care and support needs including communication and on-going health needs;

- Details of the concern; what, when, who, where;
- Immediate risk(s) and any action taken to address the risk(s);
- Preferred method of communication;
- If reported as a crime – details of which police station/officer, crime reference number etc.
- Whether the adult at risk has any cognitive impairment which may impede their ability to protect themselves;
- Any information on the person alleged to have caused harm;
- Wishes and views of the adult at risk, in particular consent; whilst it is always preferable to seek the permission of the adult before making a safeguarding referral, if it can be justified to be more of a risk not to do so, then a referral can be made without the permission of the adult at risk. See consent below
- Advocacy involvement (includes family/friends);
- Any recent history (if known) about previous concerns of a similar nature or concerns raised about the same person, or someone within the same household.

Consent and compliance to process safeguarding information under the General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA 2018)

Best practice suggests it is preferable to obtain an individual's consent before referring them to another organisation. The GDPR does allow for processing and sharing information with consent under article 6 (1) (a), and article 9 (2) (a) for special category data. However, it may not always be possible or safe to seek consent, and on occasion it may be necessary to refer an adult at risk even if they do not want it.

The following provisions in the GDPR and the DPA 2018 allow the SFO to process and share safeguarding data without consent where necessary:

- GDPR article 6 concerns the lawfulness of processing data.
 - 6 (1) (e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
- GDPR article 9 concerns the processing of special category of personal data.
 - 9 (2) (g) – the processing is necessary for reasons of substantial public interest, or
 - 9 (2) (c) – processing is necessary to protect the vital interests of the data subject or another natural person where the data subject is physically or legally incapable of giving consent.
- DPA 2018
 - Part 2 chapter 2 section 10 (3) – The processing meets the requirements of Art 9 (2) (g) only if it meets a condition in schedule 1 part 2
 - Schedule 1 part 2 (18) – safeguarding children and individuals at risk. Processing is necessary to protect an individual from neglect or physical, mental or emotional harm. Processing without consent is permissible if – consent cannot be given by the data subject, processing is necessary for reasons of substantial public interest, consent cannot be reasonably obtained, or gaining consent would prejudice the provision of protection required.

Safeguarding Form

It is important to always complete a safeguarding incident report form to ensure there is a complete record of the facts and actions taken. A copy of this form should be sent to the SFO Safeguarding Officer for record.