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1 Introduction

This document sets out the procedure for Zero Tolerance to Sexual Exploitation and Abuse. It should be read in conjunction with the related [JSP 769 policy document](#) which sets out the principles/rules governing Zero Tolerance to Sexual Exploitation and Abuse.

It is not intended for this document to be read cover to cover – you should only read the section that is relevant to you at the time.

Sexual Exploitation and Abuse is unacceptable. Defence considers this to be grounds for termination of employment and/or discharge from the Armed Forces and is committed to upholding standards of behaviour that are lawful, appropriate and professional. SEA runs contrary to the values and standards of Defence and can undermine our credibility and operational effectiveness. Failure to maintain personal and professional standards may damage team cohesion and lead to failures on operations.

Complementary to the Defence Zero Tolerance on Sexual Offending policy¹, Defence takes a zero-tolerance approach to SEA. In practice, this means that SEA is prohibited and that every alleged transgression will be acted upon through prompt and efficient investigation. It may result in administrative, disciplinary or criminal action, as appropriate².

Defence is committed to preventing, investigating and holding to account those Service personnel and civilian employees who commit SEA. This document:

- a. sets out Defence's zero-tolerance stance on SEA and how that is implemented in practice.
- b. ensures our people understand the standards and behaviours expected of them, are able to recognise breaches of these standards and know how to report incidents of SEA.
- c. identifies leadership and management responsibilities.
- d. directs efforts to prevent and address violations of SEA committed by any Service personnel and civilian employees acting on behalf of Defence.
- e. outlines appropriate assistance and redress that is available to victims of SEA.

Some types of SEA should not only be perceived as a conduct and discipline issue but should also be understood as a violation of basic human rights and may be a form of Conflict Related Sexual Violence (CRSV), both of which trigger protection and safeguarding measures

¹ [2024DIN01-027](#) - Zero Tolerance to Sexual Offences and Sexual Relationships Between Instructors and Trainees.

² See also the Defence policy on Zero Tolerance to Sexual Offending and Unacceptable Behaviours.

2 Response to an Allegation of SEA

2.1 Response Principles

The following principles should guide responses to SEA:

- a. **Do no harm (DNH)**³. The basis of DNH is to ensure careful consideration is given before acting so that no harm is done intentionally or unintentionally. This does not mean that no action should be taken, but rather that we understand the potential benefits and harms that our interventions may cause and take steps to mitigate such harm. When responding to SEA, Defence people must take all reasonable steps to ensure that inadvertent harm is not caused.
- b. **Victim-centred approach**. A victim-centred approach situates the rights and views of the victims as being central and guides prevention and response. It is a way of engaging with victims that prioritises their needs and systematically focuses on their safety, rights, well-being and expressed choices.
- c. **Cases involving children**. Where a child is or may be a victim of SEA, decisions made regarding the prevention and response to SEA must take into account the best interests of the child⁴.
- d. **Safeguarding of vulnerable people**. Where vulnerable people have been identified, advice must be sought to ensure that appropriate support is in place⁵.
- e. **Confidentiality**. Certain information is legally protected and may not be shared. Allegations of SEA must be treated with the highest degree of confidentiality to ensure that the identity of victims, complainants, witnesses, representatives and the subject of complaint are protected. Where any concerns about data sharing arise, legal advice should be sought.

2.2 Reporting Mechanisms

2.2.1 Reporting mechanisms should be safe, confidential, accessible and widely communicated. Where possible local communities should be consulted on their preferred options to report, and an analysis undertaken as to what means would be effective for that population including for children⁶. These mechanisms must consider the vulnerability of victims and how intimidating it may appear to them to report directly to the Force⁷. Where a crime has been committed it may be reported to civilian police. Reporting may otherwise

³ See [Conflict Sensitivity](#) and [Girls' Education Challenge: Do No Harm Policy](#).

⁴ See [The United Nations Convention on the Rights of the Child](#), and [Working Together to Safeguard Children](#), and [Tackling Child Sexual Abuse Strategy 2021](#).

⁵ The Service Police and Safeguarding Team may be able to assist. In-country, where a local context is key, FCDO staff may be able to provide a view.

⁶ [JSP 834](#) sets out the procedure for reporting concerns relating to children.

⁷ To include hotlines, email addresses and local points of contact.



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take place through the CoC, Service Police or through the Confidential Hotline for whistleblowing and raising a concern as below:

- Telephone: 0800 161 3665 (STD) or +44 1371 85 4881 (Overseas).
- Email: Confidential-hotline@mod.gov.uk.
- Online: [Confidential Hotline Reporting Form](#).

2.2.2 On UN operations alleged prohibited activity may be reported through:

- a. the Conduct and Discipline Team (CDT).
- b. the office of the Force Provost Marshal.
- c. the Office of Internal Oversight (OIOS).
- d. the UN Confidential hotline: +1 212 963 1111 (24hrs a day).

2.3 Protection of whistleblowers and those raising a concern⁸

Whistleblowers and those raising a concern are protected by law⁹. While the relevant Acts do not apply to the MOD, Defence has in place policies to protect whistleblowers, including those who speak up about SEA¹⁰.

- a. Defence people who report an allegation must be protected from victimisation¹¹. Where it is found a malicious report has been made appropriate action will be taken.
- b. External advice and support for whistleblowers¹² must be available and known to Defence people. Confidential advice may also be obtained through Citizens Advice.

2.4 Immediate Action

An immediate actions Aide Memoire is at Annex G.

- a. **Reporting.** All allegations of SEA must be reported immediately to the Service Police. They should also be reported to the CoC or LM for civilian employees.
- b. **Removal from duty or activity.** Where there is a credible allegation of SEA, there should be a presumption that the subject of complaint must be immediately removed from the location in which the alleged prohibited activity occurred to protect

⁸ 'Criminal accountability of United Nations officials and experts on mission' A/C.6/75/L.X ss9 and [Whistleblowing and raising a concern](#).

⁹ Employment Rights Act 1996; Disclosure Act 1998.

¹⁰ [See JSP 492 - Raising a Concern](#).

¹¹ Protection against retaliations for reporting misconduct and for cooperating with duly authorised audits or investigations, 28 Nov 2017, ST/SGB/2017/2/Rev1.

¹² [Whistleblowing for employees](#) (www.gov.uk).



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all parties involved. Those in command or the LM may apply discretion where a compelling reason exists, and such action is taken in accordance with any existing sS or MOD policy. When seeking to retain a person in their post or location, appropriate guidance must be taken from sS J1 staff. The overarching principle guiding decision making must be whether any future harm may be committed by the subject of complaint and, positive action is required. Prior to any such removal, the Service Police (and where appropriate civilian police) must be consulted to ensure this will not prejudice their investigations. The Focal Point Committee and J1 community may assist in such decision making.

c. **Medical support.** If the incident is recent and the victim known, immediate consideration must be given as to whether the victim requires medical care¹³. This may only take place with the consent of the victim. It is not necessary that medical support is provided by members of Defence, only that the victim is signposted to or provided with support locally. The subject of complaint may also need to seek medical care and should be encouraged to do so.

d. **Victim support.** Victims may require immediate support such as shelter from their family/ community if they are at risk of serious repercussions. It is not necessary that this support is provided by members of Defence, only that the victim is signposted to or provided with support locally.

e. **Support to all parties involved in SEA.** An accusation of SEA is likely to be distressing to those subject to complaint, to those who report it and to those who may have witnessed it. The chain of command or line manager for civilian employees must put in place mechanisms for the safeguarding and support of all parties.

f. **Aftercare Incident Report (AIR).** An AIR must be completed when an individual is deemed responsible for a security breach deemed to be Serious or Gross. An AIR prompts United Kingdom Security Vetting (UKSV) in consultation with the single Service Vetting Authority/DSR to consider the security implications of the individual concerned¹⁴.

2.5 Investigations which take place in the SJS

2.5.1. All allegations of SEA must be reported to the Service Police¹⁵ who can triage the case and refer to civilian police, CO or LM as appropriate. The Service Police are impartial and independent and are not duty bound to investigate all allegations¹⁶.

2.5.2. **Non-Criminal Conduct.** Some types of SEA may not be criminal in nature, but may breach standing orders, bring the MOD into disrepute or do irreparable damage to the

¹³ Recent is defined as being less than 14 days prior. Medical care should include sexual and reproductive health and, if reported within 72 hrs, HIV Post Exposure Prophylaxis (PEP) may also be required.

¹⁴ Further information may be found in [JSP 440 Part 2 Leaflet 2B - Security Clearances and Vetting](#).

¹⁵ Criminal accountability of United Nations officials and experts on mission A/C.6/75/L.X ss 9.

¹⁶ s115a AFA 06.

working relationship between the employee and the MOD. Non-criminal conduct which the Service Police do not pursue should be referred back to the CoC or LM to take forward any disciplinary or employment related processes.

2.5.3. Investigative skill sets. It is vital that investigators understand the requirement for confidentiality and that in certain circumstances victims of SEA may face potentially life-threatening consequences if their circumstances become known. Service Police should be familiar with the following:

- a. the 'do no harm' principle.
- b. understandings of 'consent' in contexts where unequal power dynamics may impact on fully informed consent.
- c. that in certain contexts sharing information with host nation police forces or witnesses may pose a risk to the victims of SEA.
- d. victims may face retribution if their circumstances become known. All information regarding complainants, victims, survivors, witnesses and persons subject to complaint must be treated with the utmost confidentiality.
- e. that an interpreter of a particular sex may be necessary.
- f. that recorded statements may provide best evidence as they may be used as evidence-in-chief in proceedings if victims are unable to attend in person.
- g. that additional consideration must be given to the rights of a child¹⁷ and that those with expertise in dealing with children are engaged.

2.5.4. Service Prosecuting Authority (SPA). Where the Service Police carry out an investigation into criminal offences arising out of SEA, early engagement with SPA must be sought from the Rape and Sexual Offences and Domestic Abuse Specialist Prosecutor, including over evidence and any measures to ensure the continued support of complainants and witnesses and their welfare.

2.6 Conclusion of Investigation in the SJS

2.6.1 Where undertaken by the Service Police, the outcome of any investigation is to be referred either to the Service Prosecuting Authority, the CO or LM.

2.6.2 For Service persons a finding of SEA having been committed should initiate administrative action and there will be a general presumption of discharge - any exceptions must be approved at 2* level. However, if sexual offences have been committed, [2024DIN01-027](#)¹⁸ will apply. For civilian employees, the staff member may be deemed to

¹⁷ See [Convention on the Rights of the Child](#).

¹⁸ Zero Tolerance to Sexual Offences and Sexual Relationships between Instructors and Trainees.



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have committed gross misconduct and again there will be a presumption of discharge and exceptions must be approved at 2* level. Legal advice must always be sought in relation to the individual's circumstances and employment rights.

3 Victim Care and Support

The Basic Principles of Justice for Victims of Crime and Abuse of Power adopted by the UN General Assembly in 1985 established norms of access to justice and fair treatment, restitution, compensation and assistance¹⁹. The UN has set up an [Office of the Victims' Rights Advocate](#) and a system wide Trust Fund to support UN and non-UN entities and organisations that provide victim assistance and support services. This includes medical care, legal services, psycho-social support, community outreach and support and communications for complainants²⁰.

Defence recognises the importance of providing expeditious support for, and the protection of, the rights of victims of SEA²¹. This includes ensuring that victims of SEA are made aware of available assistance and support²² which may be locally provided. Details on Victims Services may be found in [JSP 839](#).

The principles of providing assistance and support²³ are:

- a. assistance and support must be made available to victims irrespective of whether they themselves initiated a complaint or are cooperating with an investigation.
- b. assistance and support must be victim-centred, age, disability-and gender sensitive, non-discriminatory and culturally appropriate.
- c. assistance provided to victims must 'do no harm' and be provided in a manner which seeks to uphold their rights, dignity and wellbeing. This may entail provision of safety measures to protect against retaliation, revictimisation and retraumatisation. The rights of victims to privacy, confidentiality and informed consent in respect of assistance shall be respected.

Victims' rights²⁴ are drawn from the [Ministry of Justice Code of Practice for Victims of Crime in England and Wales](#).

¹⁹ UNGA, 'Declaration of basic principles of justice for victims of crime and abuse of power', A/RES/40/34, 29 Nov 1985.

²⁰ 'Progress on tackling the sexual exploitation and abuse of aid beneficiaries', Seventh Report of Session 2019-21, 14 Jan 2021.

²¹ 'Criminal accountability of United Nations officials and experts on mission' A/C.6/75/L.X ss12c.

²² 'Criminal accountability of United Nations officials and experts on mission' A/C.6/75/L.X ss26. The UN Victims' Rights Advocate has initiated a pilot project to map assistance and services to victims of sexual exploitation and abuse across 13 key countries where UN agencies operate.

²³ 'United Nations Protocol on the Provisions of Assistance to Victims of Sexual Exploitation and Abuse', 12 Dec 2019.

²⁴ Victims' rights may be limited where the victim and their family reside in a country other than the UK.

Annex A - Mandatory SEA Training

1. **Approved training.** The approved [training package](#) is based on the FCDO training. It is one package that is designed to raise awareness of SEA, promote a range of measures to combat it, understand the impact of SEA on victims and the consequences for Defence people who commit SEA. The modules below provide the relevant awareness:
 - a. understand what SEA is.
 - b. understand your role and responsibilities.
 - c. have confidence in managing risks.
 - d. expectations the UK Government has of implementing partners on safeguarding against SEA.
2. **Additional resources.** The [Safeguarding Resource and Support Hub](#) (RSH) supports organisations to strengthen their safeguarding policy and practice against SEA. The Hub offers an online open-access searchable platform bringing together quality assured guidance, tools, support and research. The Hub is also a repository for SEA safeguarding materials, much of which has been developed in recent years in response to high profile SEA cases within the aid sector. The relevant online training is entitled [Prevention of sexual exploitation and abuse \(PSEA\)](#).
3. **Civilian employee training.** Civilian employees are to undertake SEA training in advance of an overseas posting and undertake all mandatory training as described in the Summary of Mandatory Training document. All training activity is to be recorded on MyHR. Line managers are responsible for ensuring mandatory training takes place.
4. **CONDO training.** Designated Officers and Supervising Officers for CONDO must ensure they have received the necessary training in advance of any deployment.
5. **Recording of training.** Training competencies exist on MyHR and JPA to record mandatory training. The competency/mandatory learning names are:
 - a. MyHR. [to follow].
 - b. JPA. [to follow].
6. **Training repository.** Approved training materials will be held on a centralised portal owned by the Defence Safeguarding Team on defnet.

Annex B - SEA Risk Assessment - Commanders' Guidance

1. The risk assessment is a tool to aid professional judgement and does not replace it. It is essentially subjective and depends heavily on the Command-led understanding of the unique context in which Defence activity is taking place.
2. It is not necessary to create a stand-alone risk assessment and relevant risks may be captured on existing risk assessments and registers. JSP 375 outlines the Defence approach to undertaking a risk assessment.
3. Risk assessments should be accompanied by a workplan to mitigate and monitor the risks identified. The following risk factors are associated with SEA²⁵:
 - a. commanders' lack of awareness of the operational environment and factors that contribute to the risk of SEA.
 - b. commanders tolerating conditions that could contribute to SEA.
 - c. lack of vigilance in commanders in monitoring routine activity of their troops.
 - d. insufficient pre-deployment and in-mission training on SEA.
 - e. inadequate compliance with the policy.
 - f. lack of accountability for breaches of the policy.
 - g. non-adherence to existing reporting procedures.
 - h. failure to report acts of SEA or discouraging others from reporting.
 - i. encouraging or facilitating informal settlements when SEA is alleged to have occurred.
4. Table 1 below provides a non-exhaustive outline of low, medium and high-risk factors pertaining to SEA. The greater the amount and level of risk factors present, the greater the mitigation measures required to respond.
5. Table 2 below provides potential mitigating measures for risk factors.

²⁵ See [Military Aide Memoire: United Nations Measures Against Sexual Exploitation and Abuse](#).



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Table 1 - Risk factors for SEA			
	Low risk	Medium risk	High risk
People	- Teams with direct oversight by senior staff. - No contact with local civilians. - Short deployments with limited civilian contact. - Effective training with compliance monitored. - Good understanding of the reporting procedures and access to reporting procedures. - Cultural attitudes that frown upon transactional sex between local civilians and military staff. - Effective role models. - Direct access to an empowered SEA FP.	- Small teams with junior command. - Limited contact with local civilians. - Short deployments with some civilian contact. - Low awareness of the policy or lack of training. - Lack of knowledge of reporting procedures or poor access to complaints mechanisms. - Cultural attitudes that tolerate transactional sex between local civilians and military staff. - Lack of role models. - Periodic access to an empowered SEA FP.	- Singleton posts. - Frequent direct contact with civilians. - Long deployments with frequent civilian contact. - Lack of SEA pre-deployment training coupled with lack of awareness of the SEA policy. - Fear of reporting. - Cultural attitudes that encourage transactional sex between local civilians and military staff. - Poor role models. - Lack of empowered SEA FP.
Places / context	- Well developed economies with high employment. - Established populations with limited movement. - Bases wholly removed from civilian populations. - Places with a limited sex industry or OOB areas. - Places where alcohol use is controlled. - Places with little contact with unsupervised minors. - Where Defence people are accommodated in Defence bases with controlled access.	- Areas of poverty which staff have limited access to. - Displaced populations sited away from Defence people. - Occasional contact with civilian populations. - Open commercial sex industry. - Places where alcohol use is somewhat controlled. - Places with occasional access to unaccompanied minors. - Where Defence people are in shared private accommodation.	- Poor economic situations including food shortages and limited access to employment. - Displaced populations in proximity to Defence people in search of protection. - Close proximity of bases to civilian residential areas and private hire of local staff (e.g. cleaners). - Brothels in proximity to base / location / ships. - Places where there are no bounds to alcohol use. - Places with frequent contact with minors who are unaccompanied. - Where Defence people are in private single accommodation.
Activity	Short term non-military activity such as sports tours or staff rides with CoC/ LM oversight.	Defence activity where free time is not undertaken near civilian locations.	Exercises/ operations/ activity where free time is undertaken in civilian areas.



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Table 2 - SEA Risk factor mitigation measures

Ser	Factor	Mitigation
1	Junior staff in post with limited access to senior CoC/LM.	• Ensure they understand their responsibilities and the harms incurred through SEA. • Require that they complete a work plan to mitigate SEA. • Require routine reporting on mitigation measures to CoC.
2	Singleton posts	• Undertake frequent, unannounced visits. • Require training to be undertaken more frequently. • Establish preventative measures (curfews, off limits locations).
3	Frequent contact with civilians	• Limit the amount of time in contact with civilians / rotate through high-risk locations. • Ensure CoC oversight. • Require specific reporting on civilian contact. • Ensure contact is in working hours and in uniform/ put in place a curfew. • Limit alcohol use around civilians. • Ensure local civilian key leaders understand Defence's position.
4	Prolonged deployments	• Rotate staff through remote locations. • Avoid prolonged periods in direct contact with civilians.
5	Low awareness of the policy	• Conduct audits of the training to ensure understanding. • Reinforce the policy through orders and posters. • Include briefings/updates during routine conferences with subordinates.
6	Lack of knowledge of reporting procedures	• Reinforce the reporting mechanisms through orders and posters.
7	Fear of reporting	• Ensure that anonymous reporting mechanisms are known. • Ensure staff are informed of a trusted staff member to whom they can report. • Create a culture in which reporting is encouraged.
8	Cultures which tolerate the use of transactional sex workers	• Appoint a trusted 'champion' to convey the message about the harms that may occur.
9	Cultures which encourage the use of transactional sex workers	• Ensure that senior leadership make clear their stance on the policy. • Ensure that staff are aware of the implications, including dismissal.
10	Lack of or poor role models	• Appoint a senior and trusted staff member role model appropriate behaviour.



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11	Poor economic situations	• Promote training to understand the harmful economies created.
12	Displaced populations	• Rotate staff through postings with proximity to displaced persons.
13	Bases and accommodation in proximity to civilian areas	• Curfews, walking out policies, alcohol policies and OOB.
14	Proximity to minors	• Ensure staff understand the age of consent. • Seek to limit time that staff have in contact with minors.



Annex C - Template for Orders on SEA

The following is a template which may be used when publishing orders directing that SEA is prohibited.

SEXUAL EXPLOITATION AND ABUSE (SEA)

All staff are to comply with JSP 769 which directs that SEA is prohibited as it is damaging to victims and brings Defence into disrepute. Those who commit SEA may face dismissal from Her Majesty's Forces. Key points to note are:

1. Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. This includes, but is not limited to, the exchange of money, goods or other commodities and or services, employment or any exchange of assistance that is due to the local population in exchange for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour.
2. Sexual abuse is defined as any actual or threatened physical intrusion of a sexual nature. Acts which constitute sexual abuse include but are not limited to any action or behaviour of a sexual nature that coerces, threatens or forces a person to engage in sexual activity.
3. When undertaking Defence activity outside of the UK, Defence people are prohibited from undertaking transactional sex at all times. This includes evenings, weekends and periods of leave when taken in the country in which they are working or stationed. Transactional sex means paying or offering to pay for sex or other sexual services including payment in kind, e.g. with goods or other commodities, services, employment or other assistance.
4. Sexual activity with a person under the UK age of consent will constitute a crime and SEA. Under UK law, the age of consent is 16, but this rises to 18 when a person holds a position of trust over another²⁶. In (*insert country*) the age of consent is (*insert age*²⁷). UK law always takes primacy unless the age of consent is higher in the place in which the Service person is operating.
5. The following places are out of bounds (*insert places*).
6. Regardless of the circumstances, any person who has had unprotected sex of any kind outside of a long-term relationship may be at risk of HIV or an STD. They are strongly urged to report to the medical services. Their report will be treated with confidentiality.

²⁶ Sexual Offences (Amendment) Act 2000.

²⁷ Where the age of consent in a local context is below 16, the UK age of consent must be published as applying.



Annex D - Staff Risk Assessment

OFFICIAL-SENSITIVE (WHEN COMPLETE)

TEMPLATE RISK ASSESSMENT FOR DEFENCE PEOPLE WHO HAVE A HISTORY OF OFFENDING			
Unit/ Department	Number	Name	Date
Defence Activity	Dates of deployment	Role on deployment	Deployment location
Offence type	Offence date	Sanction applied	Remarks
Risks that this creates		Mitigation measures to be put in place	
Does the commander believe the mitigations above will sufficiently manage the risks?			
Is the individual recommended to deploy?			
Has a waiver by the relevant Force Generating Authority been issued?			

OFFICIAL-SENSITIVE (WHEN COMPLETE)



Annex E - Commanders' Self-Assessment

Ser	Issue	Remarks
1	Is there a SEA Risk Assessment in place?	
2	When was the SEA Risk Assessment last updated?	
3	Is there a trained and empowered focal point in place?	
4	Have all staff received training?	
5	Is the SEA prohibition clearly set out in Orders?	
6	What supporting policies are in place?	
7	Are the means to report widely publicised?	
8	Are reporting POC nominated and publicised?	
9	When was the last media campaign undertaken?	
11	When was the media campaign last reviewed?	
12	Are there any behaviours or areas of concern to be aware of? If so, what action has been taken?	
13	Are there any best practices to be shared? If so, has this been shared?	
14	Are there areas that should be out of bounds and have these been placed out of bounds?	
15	Has the level of risk of 'Gateway behaviours' been assessed and are measures in place to mitigate such risks?	



Annex F - Immediate Actions / Aide Memoire for Reporting

Ser	Action to be taken sequentially	Responsibility	Completed
1	Have the Service Police been informed?	Senior officer in theatre/ OIC / relevant Force Generating Authority (FGA)	
2	Has the senior officer in theatre been informed?	OIC	
3	Has the subject of complaint been removed from the location where the prohibited behaviour is alleged to have happened?	OIC	
4	Have medical provisions for the victim and subject of complaint been sought?	OIC	
5	Has the sS or Joint Force Generating Authority been informed through the Watchkeeper?	Senior officer in theatre/ OIC	
6	Has the FCDO/ Embassy been informed?	Senior officer in theatre/ OIC through DA or FGA	
7	Have CivHR/ the DE&S/SDA Casework Team been informed if the subject of complaint is a civilian employee?	Senior officer in theatre/ OIC	
8	Have the members of the Standing Committee been informed?	Relevant Force Generating Authority	
9	Have the Safeguarding Team been informed?	OIC	
10	If deployed with the UN, has the CDT been informed?	Senior officer in theatre/ OIC	
11	If deployed with the UN, have the UKPKO Team been informed?	Relevant Force Generating Authority	
12	Has a decision been made on repatriation of the subject of complaint?	OIC/CO of the subject of complaint	



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13	Have support mechanisms been implemented to safeguard the individual subject to complaint?	CO	
14	Has an Aftercare Incident Report (AIR) been completed (if an individual is deemed responsible for a security breach deemed to be Serious or Gross)	CO	
15	Have media LTT been compiled?	DCC	



4 Support Available

Personal questions not answered within this publication and cases of doubt over eligibility or entitlement are to be directed through chains of command.

To access the correct support, please go through the following routes:

- a. **Unit HR first POC** for Service personnel for any aspect of personnel administration.
- b. **JPAC Enquiries Centre Queries** regarding pay and allowances and the use of JPA: 94560 3600.
- c. **DBS Pay & Allowances Casework & Complaints Cell:**
[REDACTED] for Tri-Service pay and allowances casework and complaints via Unit HR admin staffs.

Further information on statutory (i.e. legal) entitlements can be found on [GOV.UK](https://www.gov.uk) and on the [Advisory, Conciliation and Arbitration Service \(ACAS\)](https://www.acas.org.uk) website.



5 Roles and Responsibilities

MOD expects all those involved to apply this procedure in accordance with the following generic roles and responsibilities:

Role	Key responsibilities in carrying out this procedure
Service Person	Responsible for: • following the policy. • applying the policy.
Line Manager and/or Chain of Command	Responsible for: • following the policy. • applying the policy. • recording incidents.
Defence Business Services (DBS)	Responsible for: • providing MI, as required. • uploading documents and employee-centric material into the Military People Policy Optimisation team site. • answering employee queries through the DBS Enquiry Centre or through the Digital Workplace (DWP). • providing new or amended services to meet the needs of policy, as required and iaw the CR process if they impact MilHRS.
Mil HR Advisor SME (from Wtr, TG17 and AGC specs)	Responsible for: • working closely with Senior Leaders supporting development of business strategies through HR Consultancy and Interventions on people issues. • delivering change programmes and initiatives through comprehensive people change approaches. • directing employees to DBS if they have any queries.
Mil HR Policy Holder SME	Responsible for: • engaging stakeholders (including DBS) on proposed policy or procedure changes. • drafting changes to policy suites and passing to DBS for publication



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Role	Key responsibilities in carrying out this procedure
CDP or ACDS People Cap	Responsible for: • the sign off, and fair and consistent application of this procedure. • deciding whether a policy exception can be made after consulting the Policy SME. • overseeing Military HR compliance audit requirements and compliance action plans that arise as a result.



6 Document Information

6.1 Document Coverage

This procedure supersedes all previous MOD procedures on Zero Tolerance to Sexual Exploitation and Abuse. The totality of documents included in this policy suite, of which this document is a part, are listed in the Policy and Guidance Portal.

6.2 Document Information

Filename:	Zero Tolerance to Sexual Exploitation and Abuse (Procedure)
Document ID:	JSP 769 V2.0 Feb 2025
Owning Function/Team:	CEJ / SJDC
Service Owner (1*):	Head, Service Complaints and Behaviours Team
Approving Authority:	Chief of Defence People

6.3 Document Versions

Version	Date	Revision History	Revised Pages
2.0	Feb 2025	Policy Simplification revamp.	N/A

MOD will review this procedure in two years or when changes to legislation or best practice dictate.

6.4 Linked JSPs and other policies

JSP Number	JSP Name
383	The Joint Service Manual of the Law of Armed Conflict
753	Employment and Mobilisation of UK Reserve Forces
763	Behaviours and Informal Complaints Resolution
770	Armed Forces Welfare Support Policy
822	Defence Direction and Guidance for Training and Education
830	Manual of Service Law
834	Safeguarding
839	Service Justice System - Services for Witnesses and Victims of Crime
893	Safer Recruitment and Employment
913	Whole Force Policy on Domestic Abuse
985	Human Security in Defence

Other policies:

- 2024DIN01-027 - Zero Tolerance to Sexual Offences and Sexual Relationships between Instructors and Trainees.
- Whistleblowing and raising a concern (MOD).



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- Misconduct and Discipline Policy and Procedures (MOD Main).
- Handling Arrests, Charges, Police Cautions & Convictions (MOD Main).
- Managing Unacceptable Behaviour Policy (DE&S).
- Standards, Conduct and Discipline Policy (DE&S).

7 Frequently Asked Questions

- **What is sexual exploitation?**

Sexual exploitation is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes including, but not limited to, profiting monetarily, socially or politically from the exploitation of another.

- **What constitutes sexual exploitation?**

Acts that constitute sexual exploitation include the exchange of money, goods or other commodities or services, employment or any exchange of assistance that is due to the local population in exchange for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. All such transactional sex is a form of sexual exploitation.

- **What is sexual abuse?**

Sexual abuse is defined as any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

- **What constitutes sexual abuse?**

Acts which constitute sexual abuse include any action or behaviour of a sexual nature that coerces, threatens or forces a person to engage in sexual activity.

- **Why can't you purchase sex in countries where it is otherwise legal?**

It is not always easy to know when it is lawful to purchase sex, just because it happens does not mean it is lawful. In some countries where we serve it is wholly unlawful, but Service persons who do not know this could face criminal prosecution. In some countries the law differs between territories, again adding to the difficulty of knowing when it is lawful and when it is not. Some countries have a 'buyers' law' which means it is lawful to sell sex, but not lawful to buy it. Finally, there are very high levels of trafficked and coerced persons who are sex workers, sexual activity with such persons is unlawful under British law. This policy stems from the harms that could be caused to those working as sex workers, as well as the risk that Service persons could commit criminal offences.

- **Why is buying sex such a big deal? Surely it is contributing money to people who need it.**

The buying of sex from people who are vulnerable contributes to harmful economies and exploits people who are mostly in need of protection. Those who feel strongly about supporting people who are in need of money can do so in ways other than through purchasing sex.



8 Abbreviation Table

Abbreviation	Meaning
AFA 06	Armed Forces Act 2006
AOC	Air Operations Command
AOR	Area of Responsibility
CDT	Conduct and Discipline Team (UN)
CO	Commanding Officer
CoC	Chain of Command
CONDO	Contractors on Deployed Operations
CRSV	Conflict Related Sexual Violence
CSSD	Civilians Subject to Service Discipline
DDC	Directorate of Defence Communications
DNH	Do No Harm
EAPC	Euro-Atlantic Partnership Council
FP	Focal Point
HIV	Human Immunodeficiency Virus
HMG	Her Majesty's Government
LOC	Land Operations Command
LM	Line Manager
MOC	Maritime Operations Command
MOD	Ministry of Defence
NAP	National Action Plan
NATO	North Atlantic Treaty Organisation
OIC	Officer in Command
OIOS	Office of Internal Oversight Services
PEP	Post Exposure Prophylaxis
PJHQ	Permanent Joint Headquarters
PK	Peacekeeping
PSVI	Preventing Sexual Violence Initiative
SEA	Sexual Exploitation and Abuse
sS	Single Service
SJC	Standing Joint Command
SJS	Service Justice System
SOA 2003	Sexual Offences Act 2003
SPA	Service Prosecuting Authority
SQEP	Suitably Qualified, Experienced and Trained Personnel
STTT	Short Term Training Team
UK	United Kingdom
UN	United Nations
UNSCR	United Nations Security Council Resolution
VAWG	Violence Against Women and Girls



9 Glossary

Accountability	Refers to measures taken to acknowledge, assume responsibility for, and remedy violations of international humanitarian and human rights law, policies, rules and regulations, mission-specific regulations.
Civilian employees	Individuals directly employed by Defence who do not form a part of the Service component.
Complainant	A person who makes an allegation of misconduct committed by a member of Defence but whose claims have not yet been established. A complainant may be a victim, witness or any other person who is aware of the misconduct.
CONDOS	Contractors Deployed on Operations are civilian personnel supporting the force (primarily employees of UK MOD Contractors) and comprise of UK nationals, third country nationals and locally recruited workers from the country in which the MOD is operating ²⁸ .
Defence people	Service personnel or any other person employed by or acting on behalf of Defence.
Do No Harm (DNH)	The basis of DNH is to ensure careful consideration of our presence and actions is given so no harm is done intentionally or unintentionally. Failure to understand how our presence interacts with the wider environment in which we are working, and seeking to avoid or mitigate negative impacts, our efforts can end up harming more than benefitting those we are trying to help.
Local civilians	Staff employed locally to support Defence activity but who are not directly working for or contracted to Defence.
Perpetrator	A person who commits an act of SEA.
Safeguarding	Protecting adults' rights to live in safety free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adults' wellbeing is promoted, including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action²⁹. MOD has adopted the definition of safeguarding and promoting the welfare of children as laid out in Working Together to Safeguard Children as protecting children from maltreatment; preventing impairment of children's health or

²⁸ [JSP 567 - Contractor Support to Operations](#).

²⁹ See [Care Act 2014](#).



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	development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; taking action to ensure all children have the best outcomes.
Service personnel	Members of the regular and reserve forces.
Sexual abuse³⁰	Any actual or threatened intrusion of a physical nature.
Sexual exploitation³¹	Any actual or attempted abuse of a position of trust or differential power for sexual purposes.
Sexual violence	Acts of a sexual nature against one or more persons or that cause such person or persons to engage in an act of a sexual nature by force, or by threat of force or coercion, such as that caused by fear of violence, duress, detention, psychological oppression or abuse of power, or by taking advantage of a coercive environment or such person's or persons' incapacity to give genuine consent.
Relevant Force Generating Authority	Organisations with responsibility for the deployment or posting of people on any Defence activity.
Transactional sex³²	The exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour ³³ .
Unequal power dynamics	A power imbalance which exists between those who are vulnerable, disempowered and voiceless, and those who have power over them and may act as gatekeepers to money, food, shelter and security ³⁴ . Where unequal power dynamics exist, victims may feel obliged and under pressure to carry out sexual.
Victim-Centred Approach	An approach in which the survivor's ³⁵ dignity, experiences, considerations, needs, and resiliencies are placed at the centre of the process, from the initial program design to investigating and responding to potential incidents.
Victim of SEA	For the purposes of this JSP, a victim is a person who is, or has been, sexually exploited or abused by Defence people to whom this JSP is applicable.

³⁰ A detailed definition may be found at para 4.1 b.

³¹ A detailed definition may be found at para 4.1.a.

³² A detailed definition may be found at para 4.2.b.

³³ [United Nations Glossary on Sexual Exploitation and Abuse](#). A wider definition may be found at Section 4.3.

³⁴ [Sexual exploitation and abuse in the aid sector](#).

³⁵ 'Victim' is a term often used in the legal and medical sectors, while the term 'survivor' is generally preferred in the psychological and social support sector to mean a person who has experienced sexual or gender-based violence because it implies resilience. The term victim is used throughout this JSP for consistency.