

Tackling modern slavery

A council guide

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Photographic acknowledgement

The Dark Figure* is an ongoing photographic project by Amy Romer, which seeks to raise awareness about slavery in Britain by mapping neighbourhoods where such crimes have taken place. To experience each story in full, visit: www.thedarkfigure.co.uk

Forewords

Councillor Simon Blackburn

It is a shocking fact that while most people consider the slave trade to have ended when slavery was abolished in 1833, there are more slaves today than ever before in human history. Figures from the International Labour Organisation (ILO) suggest that there are more than 40 million people in modern slavery across the world, with nearly 25 million held in forced labour. They have previously estimated that forced labour is generating criminal profits of approximately £150 billion a year.¹

As councillors and leaders of local places, we all need to be aware that the UK is a source, transit and destination country for modern slavery. The Home Office estimated that in 2013 there were between 10,000 and 13,000 potential victims of modern slavery in the UK.² This means that there is a good chance modern slavery is taking place in the towns, cities and villages where we live.

Modern slavery is hidden, often in plain sight; on our high streets, in local businesses and even suburban streets. Unwittingly, our communities may be using victims of modern slavery to wash their cars, paint their nails and lay their drives. They may even be living next door.

The purpose of this guide for councils is to increase awareness of modern slavery and provide clarity for councils on their role in tackling it. In developing this, the LGA's Safer and Stronger Communities Board has worked with the Independent Anti-Slavery Commissioner, Kevin Hyland OBE. We would encourage all our members to draw on the resources of the Commissioner and other local partners to help stop slavery and are grateful for their work and input.

In a speech on slavery to the House of Commons in 1791, William Wilberforce famously closed his remarks by saying **'Having heard all of this you may choose to look the other way, but you can never say again that you did not know'**. More than 200 years later we cannot look the other way, but must ensure that all of our authorities are well equipped and active in tackling this abhorrent crime.

Councillor Simon Blackburn

Chair, LGA Safer and Stronger Communities Board

¹ www.ilo.org/global/publications/ilo-bookstore/order-online/books/WCMS_243391/lang--en/index.htm

² www.gov.uk/government/uploads/system/uploads/attachment_data/file/386841/Modern_Slavery_an_application_of_MSE_revised.pdf

Kevin Hyland OBE

There are an estimated 40.3 million people living in slavery today,³ and the Home Office estimates that up to 13,000 of those are based in the UK.

These are shocking numbers to contemplate in a society which thought it had consigned slavery to the records of 19th century history, but while statistics are important, it is the human beings behind them who should inspire us to fight the crime. In years to come, numbers will be forgotten; the names, faces and voices of brave yet vulnerable victims who ask for our help will not.

The help which councils are able to give, bolstered by the passing of the Modern Slavery Act 2015, is crucial. The Act provides victims with greater protections and police with greater powers. It also requires businesses to report on the action they are taking to identify and address slavery in their supply chains, and introduced the office I currently hold, that of Independent Anti-Slavery Commissioner. As Commissioner I am tasked with spearheading the UK's response to modern slavery and have a statutory footing over law enforcement, the health sector, immigration bodies and local authorities. While such a role can help bring organisations to task, it is only professionalism and team work which will ultimately help victims to heal and put dangerous slave masters behind bars.

Council employees are already working incredibly hard, rescuing and caring for victims while reducing the risk of repeat trauma.

From the identification, referral and support of victims through to providing shelter, safeguarding and ensuring its own supply chains are slavery-free, local government is central to every facet of the slavery fight.

Going forward, I am therefore calling on all local councils to build on this best practice and consider how they can ensure a collaborative approach to modern slavery across every department.

All councils have expertise in partnership working. Whether collaborating with schools to protect children or consulting with the housing sector to keep tenants safe, many local government employees lead the way in good, diligent and professional teamwork. This is a model I want to build into the anti-slavery response in every sector of society over the coming years. I therefore urge you to continue shining this light to build even stronger partnerships which will lead to more streamlined responses to victim identification. Safer environments for modern slavery victims and even stronger deterrents for unsavoury criminals are the responsibility of all of us, everywhere.

This important guide will help councils understand their role in addressing modern slavery, and I have been pleased to work with the Local Government Association (LGA) in its development.

Kevin Hyland OBE

Independent Anti-Slavery Commissioner

³ Global Estimate on Modern Slavery 2017: www.alliance87.org/2017ge/modernslavery#!section=0

Modern slavery – an overview

What is modern slavery?

Modern slavery is an umbrella term, encompassing human trafficking, slavery, servitude and forced labour.

Someone is in **slavery** if they are:

- forced to work through mental or physical threat
- owned or controlled by an ‘employer’, usually through mental or physical abuse or the threat of abuse
- dehumanised, treated as a commodity or bought and sold as ‘property’
- physically constrained or have restrictions placed on their freedom.⁴

Servitude is similar to slavery, in that a person is under an obligation to provide a service which is imposed on them, but there is no element of ownership.⁵ **Forced work** is defined as ‘work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself voluntarily’⁶ and has been found in a number of different industries including manufacturing, food processing, agriculture and hospitality.

Finally, **human trafficking** is when men, women and children are moved and forced into exploitation. The movement could be international but also within the country, from one city to another or even just a few streets. A person is a victim of human trafficking even if they haven’t yet been exploited but have been moved for the purposes of exploitation.

4 www.unseenuk.org/about/the-problem/modern-slavery

5 www.equalityhumanrights.com/en/human-rights-act/article-4-freedom-slavery-and-forced-labour

6 www.ilo.org/global/topics/forced-labour/definition/lang--en/index.htm

Types of modern slavery

There are a number of different types of exploitation that victims of modern slavery may be subjected to, and victims may experience more than one type of exploitation at the same time. The most common forms of exploitation are:

- **Sexual exploitation:** victims may be forced into prostitution, pornography or lap dancing for little or no pay. They may be deprived of their freedom of movement and subjected to threats and violence.
- **Labour exploitation:** a victim is made to work with little or no pay, and may face violence or threats. If they are foreign nationals, their passports may be confiscated by their exploiters and they may be made to live in terrible conditions and under constant threat.
- **Forced criminality:** victims can be forced to participate in a range of illegal activities including pick pocketing, shop lifting, cannabis cultivation, county lines exploitation⁷ and other activities. The Modern Slavery Act provides for a defence for victims who have been forced into criminality.
- **Organ harvesting:** victims are trafficked in order for their internal organs (typically kidneys or the liver) to be harvested for transplant.
- **Domestic servitude:** victims work in a household where they may be ill-treated, humiliated, subjected to exhausting hours, forced to work and live under unbearable

7 County lines is the police term for urban gangs supplying drugs to suburban areas and towns using dedicated mobile phone lines – these are the county lines. It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money.

conditions or forced to work for little or no pay.⁸ In some cases forced marriage can lead to domestic servitude.⁹

Debt bondage can be present in many forms of exploitation, and can take a range of forms. Debts may arise out of the exploitation itself, for example in relation to accommodation or travel fees, with victims having little or no control over their debt and little or no way to pay it back. Costs may be deducted from their wages, leading to further debts being accrued. A person may be forced to work to pay off the debt and it can also be used as a means of controlling a victim and keeping them enslaved.

Other forms of exploitation include:

- **forced marriage:** where people are forced into marriage for a range of reasons including exploiting the rights conferred on them by citizenship or for domestic servitude
- **financial exploitation:** for example benefit fraud, where benefits are falsely claimed by perpetrators on behalf of their workers; bank accounts being opened in a victim's name but used by perpetrators; or workers' wages being paid directly into the exploiters, own bank accounts by companies who think they are paying a worker individually.

In October 2017 the Government produced 'A Typology of Modern Slavery Offences in the UK' to categorise modern slavery offences and provide an evidence base for responding to the crime of modern slavery. The research classified modern slavery offences in the UK into 17 distinct types. For each type, the report outlined the characteristics of the typical victims and offenders, and the nature of the offence, including the recruitment, transportation and exploitation involved.

The Typology report can be read here: www.gov.uk/government/publications/a-typology-of-modern-slavery-offences-in-the-uk

8 www.gov.uk/government/uploads/system/uploads/attachment_data/file/509326/victims-of-modern-slavery-frontline-staff-guidance-v3.pdf

9 www.humantraffickingfoundation.org/sites/default/files/Trafficking%20Survivor%20Care%20Standards%202015.pdf

Victims and perpetrators

Anyone can become a victim of modern slavery, and in all types of exploitation, victims can be women, men, girls or boys. National Crime Agency (NCA) figures for 2016 showed that of 3,805 potential victims identified and referred to the National Referral Mechanism (NRM)¹⁰ for modern slavery, 1,936 were female, 1,864 were male and five transgender; 2,527 were adults and 1,278 were referred for exploitation as a minor.

The NCA's NRM data for 2016 indicates that the most common recorded type of exploitation for potential adult victims was labour exploitation, including criminal exploitation. Men were particularly vulnerable to labour exploitation, while adult women were more likely to be recorded as having been subjected to sexual exploitation, although there were male, female and child victims of each type. The most common exploitation for people first exploited as a minor was labour exploitation, which includes forced criminality such as cannabis cultivation¹¹, although as with adult figures, more boys (400) were recorded as potential victims of labour exploitation (compared to 68 girls), and more girls (118) were recorded as potential victims of sexual exploitation (compared to 29 boys¹²).

This is a crime that affects British victims as well as those trafficked into the UK. Albania, Vietnam and the UK were the most common nationalities of all the potential victims referred to the NRM in 2016, though there were referrals from 108 different nationalities.¹³

10 National Referral Mechanism: a framework for identifying victims of human trafficking or modern slavery and ensuring they receive the appropriate support

11 www.nationalcrimeagency.gov.uk/publications/788-national-referral-mechanism-statistics-end-of-year-summary-2016/file

12 Ibid

13 Ibid

There is no single type of victim or pathway into modern slavery. However, the Home Office's front-line staff guidance identifies certain groups as particularly vulnerable to being exploited through modern slavery:

- unaccompanied, internally displaced children
- children accompanied by an adult who is not their relative or legal guardian
- young girls and women
- former victims of modern slavery or trafficking.¹⁴

Traffickers or modern slavery facilitators are also known to target vulnerable men, such as those with substance misuse issues, debts (in their country of origin or as a result of their illegal migration) mental health problems or learning disabilities. A recent report from the Independent Anti-Slavery Commissioner titled 'Understanding and Responding to Modern Slavery within the Homelessness Sector'¹⁵ found that those who are homeless are vulnerable to rogue employers offering work and accommodation, and that victims of modern slavery could be at risk of destitution and homelessness if no long-term support is provided to them. Of those homeless organisations that participated in the research, 64 per cent reported coming across potential victims of modern slavery. The report outlined a set of twelve recommendations, including a number for local authorities to consider in their work.

Victims of modern slavery have often been promised a better life or a legitimate job before they are exploited, and by the time they find out that the job doesn't exist they are already enslaved. Some victims might not see that they have been exploited or feel that the life they are living is better than the one they might have lived at home. Others may be too scared to seek help from the authorities because of the threats that they have endured, because they have been

14 www.gov.uk/government/uploads/system/uploads/attachment_data/file/509326/victims-of-modern-slavery-frontline-staff-guidance-v3.pdf

15 www.antislaverycommissioner.co.uk/media/1115/understanding-and-responding-to-modern-slavery-within-the-homelessness-sector.pdf

involved in criminal activities, because of their immigration status, or due to a sense of misplaced loyalty to the perpetrators.

They might have been given a prepared story, by traffickers or modern slavery facilitators, to use when talking to the authorities. They may also be aggressive or hostile to the authorities or have difficulties in recalling what they've experienced as a result of trauma. Victims may have undergone juju or witchcraft rituals; these rituals are used to instil fear and make the victim compliant. They may be threatened with or have experienced violence, may be controlled through debt, or have been groomed.

Perpetrators of modern slavery can be serious and organised crime groups, but may also be an individual close to the victim, such as family members, friends, individual employers or partners.¹⁶ Different types of perpetrator are more likely to be involved in different types of exploitation; domestic servitude in particular can be committed by individual perpetrators often family, partners or family friends, who've promised a better life to the victim.¹⁷

The NCA's latest work on the threat of serious and organised crime in the UK included the threat of modern slavery and human trafficking crime groups. They found that the most prevalent offender nationalities in the UK were British and Romanian, with Eastern Europe the most cited wider region of origin.

Offenders were most likely to target people from within their own nationality or ethnicity, in the majority of cases, though they found that British offenders targeted victims from a broad range of nationalities. They found that the majority of crime groups involved in human trafficking were small with limited hierarchies often predicated on familial or social links, although larger, more structured groups do exist.¹⁸

16 <http://glaconservatives.co.uk/wp-content/uploads/2013/10/Shadow-City.pdf>

17 www.gov.uk/government/uploads/system/uploads/attachment_data/file/383764/Modern_Slavery_Strategy_FINAL_DEC2015.pdf

18 www.nationalcrimeagency.gov.uk/publications/807-national-strategic-assessment-of-serious-and-organised-crime-2017-file

Sophia's story

Sexual exploitation

Sophia was a student living in Albania. She was studying to become a primary school teacher at university when she met her boyfriend. After five months together they arranged to go on holiday to Italy where her boyfriend had friends they could stay with.

The couple travelled together and after arriving at his friend's house her boyfriend said they would stay a few nights before moving on. After finding a number of women's passports in her boyfriend's possession and confronting him, Sophia was physically assaulted. After reconciling he talked about visiting his cousins in Belgium.

When Sophia arrived in Belgium the cousins took her to what looked like an abandoned house. She asked to speak to her boyfriend on the phone who told her "We have nothing to do with each other, it ends here".

The men then told her that she was going to start working for them. They brought customers to her for sexual services. They threatened to kill her brother back in Albania if she refused any customers. Despite this Sophia often refused, resulting in her being beaten. They would often force her to drink alcohol, beat and torture her.

She was then forcibly trafficked to the UK and threatened with a gun to make her comply. Once in the UK she was transported to a house, where again she was told that she would provide sexual services. Sophia told her exploiters she was not willing to do this kind of work anymore. She was tied up and the men sat down next to her and lit up cigarettes. When they had finished smoking them they stubbed them out on her. They beat her and she was regularly given vodka to drink.

One day she was given some provocative clothing and high heels and told to put them on and ordered into a car. When the car stopped at traffic lights she managed to escape despite being chased by one of the men. She grabbed a female passer-by and pulled at her arm begging for help. The woman telephoned the police and the man who had been following her, left.

After claiming asylum in Croydon she was dispersed to Wales where she received help through the organisation, BAWSO. Sophia is now married and works full time.

Stephan's story

Labour exploitation

Stephan grew up in Latvia. He wasn't working when he was introduced to the 'Boss' by a friend. Stephan was told he could earn good money in the UK legally. When he arrived in the UK his passport was taken from him, however, he was supported by the 'Boss' to gain a national insurance number and to open a bank account.

Stephan was brought to England by car and taken to the Derby area. He initially worked in a meat factory working 12 hour shifts, three or four days a week. At Christmas time it would be every day for a week. He worked at the meat factory for a year and a half. His accommodation was very basic. Stephan received £25 per week from the 'Boss' for basic essentials and food.

The second factory he worked in he was controlled by the same 'Boss'. He worked 12 hours shifts and was given £10 per shift from the 'Boss'. The 'Boss' took cash withdrawals from Stephan's bank account.

From March 2017 to May 2017, Stephan worked in a flower factory with the 'Boss' paying him £7 for a 12 hour shift.

The 'Boss' was not an internal employee of any of the organisations in which Stephan worked, however he did control his money, living accommodation and transport to and from work.

Stephan returned one evening to his accommodation and contacted a female friend. He went to stay with this friend and the next day this woman introduced Stephan to two of her English friends. These men supported Stephan in calling the police and the bank to freeze his account. Stephan was then taken to the police station where he made a statement and was put in touch with the British Red Cross.

The above victim's stories were provided by the subcontractors of the Adult Victims of Modern Slavery Victim Care Service.

The legislative framework for tackling modern slavery

The Government's approach to tackling modern slavery has been heavily shaped by a number of international laws, conventions and protocols which the UK has opted in to, ratified or is already bound by, including the:

- 1950 European Convention on Human Rights (ECHR)
- United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children (Palermo Protocol 2000)
- Council of Europe Convention on Action against Trafficking in Human Beings 2005 (ECAT)
- EU Directive on Preventing and Combatting Trafficking in Human Beings and Protecting its Victims Directive 2011 (the Anti-Trafficking Directive).

Collectively, these laws and protocols set out agreed definitions and obligations on countries to identify and support victims. The Government has stated that it intends to maintain close cooperative links and partnerships with the EU in criminal justice after the UK exits the European Union, including around serious and organised crime.

In March 2015 the Coalition Government enacted the Modern Slavery Act 2015. The Act:

- consolidated and clarified existing modern slavery and human trafficking offences and increased the maximum sentences for committing these offences
- introduced slavery and trafficking prevention orders and slavery and trafficking risk orders – which can be used to disrupt activities by modern slavery perpetrators
- created the role of the Independent Anti-Slavery Commissioner
- introduced support and protection for victims including a defence for victims of slavery or trafficking who commit an offence, measures on the presumption of age of child victims of modern slavery and introduced the role of Independent Child Trafficking Advocates
- introduced a requirement for certain businesses to produce and publish a modern slavery statement on what they are doing to tackle modern slavery and trafficking in their supply chains.

Most of the provisions of the Act concern England and Wales only, apart from the creation of the Independent Anti-Slavery Commissioner, who has a UK wide remit, and particular provisions around maritime enforcement powers. Scotland and Northern Ireland have both introduced separate legislation.

The Act includes a number of provisions for local authorities. Section 52 of the Act places a duty on them to identify and refer modern slavery child victims and consenting adult victims through the National Referral Mechanism (NRM). Councils also have a duty to notify the Home Secretary of adults who do not consent to enter the NRM. There are different forms for the NRM for adults and children and another form for adults who do not consent, called the MS1 form.

Section 43 of the Act states that specified public authorities (including councils) have a duty to cooperate with the Commissioner.

The Modern Slavery Act 2015 builds on the Modern Slavery Strategy published by the Coalition Government in 2014. Like the Serious and Organised Crime Strategy, it is based around the 4Ps framework of pursue, prevent, protect and prepare.

- **Pursue:** prosecute and disrupt individuals and groups responsible for modern slavery.
- **Prevent:** prevent people from engaging in modern slavery.
- **Protect:** strengthen safeguards against modern slavery by protecting vulnerable people from exploitation.
- **Prepare:** reduce the harm caused by modern slavery through improved victim identification and enforcement support.

The Modern Slavery Strategy is particularly focussed on the law enforcement response, though councils' role in safeguarding and caring for children and tackling child sexual exploitation is particularly mentioned, and outlines the expectation that Police and Crime Commissioners would reflect the local threat within their policing plans and strategies.

As well as the Modern Slavery Act 2015 there are a number of other pieces of legislation that have an impact on local authorities' role in supporting victims of, and tackling, modern slavery, including:

- Crime and Disorder Act 1998
- Housing Act 1996
- Care Act 2014
- Children Act 1989
- Immigration Act 2016.



Staverton, Cheltenham

March 2011

Gloucestershire constabulary carried out warrants at three properties in Gloucestershire, Derbyshire and Leicestershire after a year-long investigation, including a five month surveillance operation of the Connors family was triggered by the discovery of the remains of a body, which was found near the Connors family home in May 2008.

19 vulnerable people were found living at Beggars Roost caravan park in Staverton living in squalid conditions and were subject to assault, theft of benefits and exploitation.

All five members of the Connors family were found guilty of the conspiracy to require a person to perform forced or compulsory labour between April 2010 and March 2011.

To experience the story in full, visit:

www.thedarkfigure.co.uk

Overview of the role of councils in tackling modern slavery

Councils can play a key role in tackling modern slavery. Their role can be separated into four distinct areas, each of which is explored in more detail in the following sections:

1. identification and referral of victims
2. supporting victims – this can be through safeguarding children and adults with care and support needs and through housing/homelessness services
3. community safety services and disruption activities
4. ensuring that the supply chains councils procure from are free from modern slavery.

Modern slavery intersects with many different areas that councils are involved with, and a number of different officers may come across it whilst going about their everyday duties:

- in housing and homelessness services, councils may see people who are at risk of trafficking through the provision of homelessness services, or through inspections of houses in multiple occupation (HMOs) they might come across modern slavery victims living in substandard accommodation
- community safety officers may come across trafficking or modern slavery whilst working on issues around serious and organised crime, gangs, drug selling and other crimes committed within their area – like cannabis cultivation and begging

- Trading Standards, licensing and environmental health and other regulatory services (eg fire safety) may encounter victims or perpetrators whilst inspecting premises such as nail bars and regulating other businesses, such as taxis and private hire vehicles
- councillors may hear concerns from residents about particular businesses or houses in their areas
- those working with local partners on resettling new arrivals may find that trafficking or modern slavery has been present in refugees and asylum seekers' routes into the UK
- customer services may come into contact with victims through their ordinary dealings with the public
- children's safeguarding services will deal with trafficked children or children who have been exploited
- adult safeguarding services may have a role supporting adult victims with care and support needs.

This list is not exhaustive and there will be many other places where council staff and councillors may come across modern slavery or trafficking.

Given the different services which may come into contact with modern slavery, councils should consider how they can ensure a joined-up approach to the issue across their organisation.

This is particularly important in terms of identifying and referring victims, being aware of suspected modern slavery in their areas and ensuring that any intelligence and information about modern slavery is collated centrally within the council – without this, councils will not have an overall picture of the scale of the problem or full understanding of their own work in this area.

Although the numbers of suspected modern slavery cases in some areas will be small, this may nevertheless require councils to designate a lead officer or team who can collect this data from across different teams and act as a point of contact and expertise on the issue. Alternatively, councils may wish to have a single point of contact and expertise within the relevant teams potentially impacted by modern slavery. Councils should consider how this role could link up with other existing roles working within the local justice systems.

Underpinning councils own work in this area will of course be effective partnership working. Councils will already be part of numerous partnerships that have a role in sharing information, identifying those at risk of exploitation and tackling modern slavery as part of their broader work. Working with community safety partnerships, local child safeguarding arrangements, adult safeguarding boards, or other local partnerships, as well as with other partners such as the Gangmasters and Labour Abuse Authority (GLAA), will be a critical part of councils' work. See more in the section on 'Role of partners in tackling modern slavery'.

There are a number of local and regional areas that have set up modern slavery partnerships bringing together partners from a range of different areas to coordinate work across the area. A joint report by the Independent Anti-Slavery Commissioner and the University of Nottingham, entitled 'Collaborating for Freedom', has mapped the anti-slavery partnerships in existence across the UK. An interactive map of these partnerships can be viewed here: <http://iascmap.nottingham.ac.uk>.¹⁹ These partnerships have brought together a wide range of participants, which have included district and county councils, police and crime commissioners, fire and rescue services, NGOs, the GLAA, safeguarding services, health, police services and government agencies, among others.

Councils should think about their engagement with the wider private, community and voluntary sector in their local area. Forums such as local enterprise partnerships or local strategic partnerships can be used to ensure that there is awareness of modern slavery and the potential risk in supply chains, that it can be referred appropriately and joint initiatives can be launched.

Again, councils should think about the most effective way for their authority to engage in partnership work on modern slavery, including ensuring that they have the appropriate local contacts for national agencies, considering whether a single point of contact per team or at the authority would be useful approach.

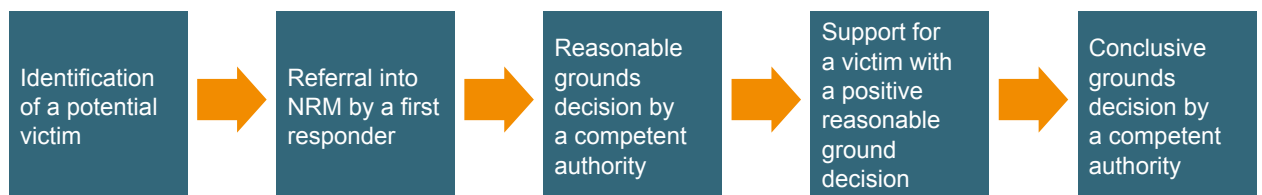
¹⁹ www.antislaverycommissioner.co.uk/media/1186/collaborating-for-freedom_anti-slavery-partnerships-in-the-uk.pdf

Identification and referral

The National Referral Mechanism process

The National Referral Mechanism (NRM) provides a framework to identify, refer and record potential victims of modern slavery. Reflecting the fact that councils may come across potential victims of modern slavery in many aspects of their work, councils have a formal role as first responders to the NRM. First responders are organisations with a responsibility to identify and refer potential adult or child victims of modern slavery.

There are five basic stages in identifying a potential victim and their journey through the NRM.



This chapter will examine these in more detail, focusing on the existing process; recent changes to the NRM announced by the Home Office are set out at the end of this section.

Identifying a potential victim

Everyone should be aware of the signs to spot potential victims of modern slavery.

In October 2016 the Independent Anti-Slavery Commissioner, jointly with South East England Councils and NHS England produced a set of three modern slavery awareness raising videos for local councils, emergency services and health professionals. The aim of these is to emphasise the vital role front-line professionals have in tackling modern slavery and helping victims to exit exploitation, and to equip them to spot initial signs of modern slavery. The videos for local government and the emergency services are publicly available on the LGA website: www.local.gov.uk/modern-slavery

The Salvation Army is contracted by the Government to provide support to adult victims of modern slavery referred to the NRM in England and Wales. It has produced a number of questions to support the identification of victims:

Is the victim in possession of a passport, identification or travel documents? Are these documents in possession of someone else?

Does the victim act as if they were instructed or coached by someone else? Do they allow others to speak for them when spoken to directly?

Was the victim recruited for one purpose and forced to engage in some other job?

Was their transport paid for by facilitators, whom they must pay back through providing services?

Does the victim receive little or no payment for their work? Is someone else in control of their earnings?

Was the victim forced to perform sexual acts?

Does the victim have freedom of movement?

Has the victim or family been threatened with harm if the victim attempts to escape?

Is the victim under the impression they are bonded by debt, or in a situation of dependence?

Has the victim been harmed or deprived of food, water, sleep, medical care or other life necessities?

Can the victim freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment?²⁰

Further information on the indicators and signs of modern slavery is available in Annex A of this document.

Referring victims

Under Section 52 of the Modern Slavery Act 2015, local authorities are under a duty to notify the Home Office when they identify a potential victim of modern slavery (where it is believed a potential victim's life is in immediate danger, the advice is to call 999).

For children this means referring them into the NRM through children's services. For adults, a NRM referral can also be made if they consent to the referral. If an adult doesn't consent to enter the NRM, councils are still under a duty to notify and should refer them to the Home Office by submitting the MS1 form.²¹

²⁰ www.salvationarmy.org.uk/spot-signs-modern-slavery
²¹ www.gov.uk/government/publications/duty-to-notify-the-home-office-of-potential-victims-of-modern-slavery

Councils are first responders into the NRM, alongside the organisations listed below:

- National Crime Agency
- police forces
- UK Border Force
- Home Office Immigration and Visas
- Gangmasters and Labour Abuse Authority
- health and social care trusts (Northern Ireland)
- The Salvation Army
- Migrant Help
- The Medaille Trust
- Kalayaan
- Barnardo's
- Unseen
- TARA Project (Scotland)
- NSPCC (CTAC)
- BAWSO (Wales)
- New Pathways
- Refugee Council.²²

Council staff should be familiar with the referral processes that their council has in place when they come across a potential victim of modern slavery.

All referrals to the NRM initially go to the National Crime Agency's Modern Slavery Human Trafficking Unit (MSHTU) as the competent authority. However, potential victims who are non EU/EEA nationals and are subject to immigration control are referred to the Home Office Visas and Immigration (UKVI) to act as the competent authority instead.

Making a referral for adults

In the case of adult victims consent must be given before a referral can be put into the NRM. If an adult doesn't consent to enter the NRM, councils are still under a duty to notify and should instead complete an MS1 form which is then sent to the NCA.

²² www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism

The purpose of the MS1 form is to allow government to gather statistics and build a more comprehensive picture of the nature and scale of modern slavery. The MS1 form allows the potential victim to remain anonymous and it does not entitle potential victims to any specialist government support. If councils are submitting an MS1 form the case should also be separately referred to the police, this should be done in advance of submitting the MS1 form.²³

If a person is deemed incapable of giving informed consent under the Mental Capacity Act 2005, a guardian should be appointed to help him or her make decisions. The person, however, should still be placed at the centre of the decision making process.

Councils and their partners will wish to develop other routes to ensure that adult victims of modern slavery who do not wish to be referred into the NRM either immediately or in the long term receive any support from the council they are eligible for and are signposted to any support available locally. More information is available below.

Making a referral for children

Children's social services departments are able to make a referral into the NRM. Other areas of a council should refer potential child victims via their local children's services, to make sure that any safeguarding measures can be put in place, and that the police are notified. Those child protection processes should continue to take place regardless of subsequent decisions made through the NRM.

Professionals should consider the wider circumstances around the individual child when making an assessment. It is also important to note that children might not show obvious signs of distress or abuse.

A potential child victim does not need to consent to an NRM referral being made, but it is good practice to let them know that it is happening and to explain the benefits, the possible outcomes and discuss any concerns.

If a child is part of a family in modern slavery, referrals still take place in the same way, and child safeguarding procedures should still be undertaken.

A referral form should include as much information as possible, including documentary evidence where available. Since all potential child victims should be referred to the NRM, an MS1 form is not used for children.

Sometimes there may be a dispute over whether the potential victim is a child. Under section 51 of the Modern Slavery Act, where a council has reasonable grounds to believe a person is under 18 then they will be treated as a child, until an age assessment is carried out. An age assessment should be commissioned where appropriate, but referral to the NRM should not be delayed. Once a reasonable grounds decision has been made the decision will be reported to the first responder and the child's social worker, not to the child directly.

If there has been enough evidence to take the child into local authority care, there are specific risks that councils and carers will need to be aware of. Nearly two thirds of trafficked children in local authority care go missing at some point; nearly a third of these go missing within one week.²⁴ Councils must make sure a strong multi-agency approach is in place to protect victims from further harm from their abusers. In particular, there should be a clear understanding between the local authority and the police of roles in planning for this protection and responding if a child goes missing.

²³ www.gov.uk/government/uploads/system/uploads/attachment_data/file/508817/Duty_to_Notify_Guidance_Version_2.0_.pdf

²⁴ www.ecpat.org.uk/sites/default/files/trafficked_children_and_missing_ecpat_uk_and_missing_people_joint_briefing_october_2014.pdf

Reasonable grounds decision

Once an NRM form has been completed potential victims will receive a 'reasonable grounds' decision from the competent authority. A reasonable grounds decision is made using the threshold of 'I suspect but cannot prove' that the individual is a potential victim of modern slavery or trafficking.²⁵

Competent authorities aim to make reasonable grounds decisions within five days. This may involve seeking additional information from the first responder, from specialist NGOs or local authorities, especially where there may be a negative reasonable grounds decision. Where a negative reasonable grounds decision is taken this decision must be reviewed by a 'second pair of eyes'. If victims receive a negative reasonable grounds decision they do not receive specialist government support.

During those five days if the victim is destitute, support can be provided through the Government's contract with The Salvation Army. To activate any support during these five days, alongside sending in the NRM referral form, the first responder would need to contact The Salvation Army separately to arrange this (via the 24 hour referral number: 0300 303 8151). The NRM form alone would not alert The Salvation Army to emergency support needs.

Support for victims and conclusive grounds decisions

The process for adults

If a positive reasonable grounds decision is made the adult potential victim will be:

- allocated a place within government funded safe house accommodation, if required
- granted a reflection and recovery period of a minimum of 45 calendar days.

The first responder and the victim are notified of the decision.

The reflection and recovery period allows the victim to begin to recover from their ordeal and to reflect on what they want to do next. There may be a range of outcomes for victims, including cooperate with police, apply for discretionary leave to remain, ask for asylum or help to return home, etc – a full list can be found on the NCA's website.²⁶

During the reflection and recovery period the competent authority will gather further information to see if a conclusive grounds decision can be reached on whether a person has been a victim of trafficking or modern slavery. The competent authority can increase the length of the rest and recovery period to allow them to gather more information.

If someone has received a positive conclusive grounds decision then they are normally given 14 days to exit the support provided through the NRM. The person can also be offered support to return to their country if they have been trafficked or are a victim of modern slavery and do not wish to stay in the UK.

²⁵ HO competent authority guidance www.antislaverycommissioner.co.uk/media/1059/victims_of_modern_slavery_-_competent_authority_guidance_v3_0.pdf

²⁶ www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism

If it is decided by the competent authority that the person was not trafficked nor is a victim of modern slavery, and there are no other circumstances that would give them a right to live in the UK, they are typically given 48 hours to exit support.²⁷

The process for children

Councils might need more time to work with a child to get enough information for the competent authority to reach a conclusive grounds decision, for example where a child has experienced significant trauma or is in fear of speaking to authorities. In these circumstances you may request of the competent authority that the 45 day reflection period be extended, where this is in the best interests of the child, so that all relevant information can be obtained.

If a child receives a positive conclusive grounds decision, appropriate support should be put in place to help them deal with the trauma they may have suffered, and to minimise the risk of their going missing and returning to those seeking to exploit them. This information should be contained within the child's care plan if they are in local authority care.

Transfer to the care of another council or an out of area placement might in some cases be appropriate to put distance between the child and where their traffickers expect them to be.

In the case of unaccompanied asylum seeking children, there should also be information in the care plan on the asylum seeking process to ensure that children are kept informed and well supported throughout the process to minimise fear and uncertainty. If the child receives a negative asylum or immigration decision, discussions about their status will need to be handled sensitively and social workers should be alert to a heightened risk of the child going missing and take all necessary steps to prevent this.

Where a negative conclusive grounds decision is reached, councils should revert to their normal child protection assessments to identify what support is needed for the child.

Independent Child Trafficking Advocates

Following an initial pilot roll-out of the Independent Child Trafficking Advocates (ICTAs) approach, the Government made a decision²⁸ to implement ICTAs across three early adopter sites in England and Wales – Hampshire and Isle of Wight, Greater Manchester and Wales. The role of ICTAs is to represent and support children who there are reasonable grounds to believe are victims of modern slavery. They ensure the best interests of children are represented in decision-making.

National Referral Mechanism reform

The NRM system has been under review for a number of years. In October 2017 the Government announced a number of changes to the NRM process. The key changes announced were:

- The length of time on support for victims who have received a positive conclusive ground decision, will be increased from 14 days to 45 days. This will be in addition to the minimum 45 days victims receive after a positive reasonable grounds decision.
- The Government will fund 'places of safety' so that adult victims leaving exploitative situations can be given support, including safe accommodation and advice for three days before deciding whether to enter the NRM.
- Victims who have received a positive conclusive grounds decision will also have access to drop-in services for up to six months after they leave NRM support.

²⁷ www.humantraffickingfoundation.org/sites/default/files/Trafficking%20Survivor%20Care%20Standards%202015.pdf

²⁸ www.gov.uk/government/uploads/system/uploads/attachment_data/file/486693/53019_Un-num_Report_PRINT.pdf

- The first responder role will be strengthened and criteria will be established on who should be a first responder and how they should be trained.
- ICTAs will be rolled out nationally. The Government will also be looking at how to make the NRM decision-making process 'child-friendly' including how NRM decisions are communicated to children.
- A single, expert unit will be created in the Home Office to act as the competent authority and handle all cases referred from first responders and to make decisions about whether somebody is a victim of modern slavery. This will replace the two current competent authorities, and will be completely separate from the immigration system.
- An independent panel of experts will be established to review all negative conclusive grounds decisions.
- A new digital system to support the NRM process, including submitting NRM referral form online, making it easier for those on the front line to refer victims for support and enabling data to be captured and analysed to better aid prevention and law enforcement.
- Adoption of the Trafficking Survivor Care Standards²⁹ produced by the Human Trafficking Foundation as a minimum standard of victim support in all future contracts providing support to adult victims of modern slavery.

The Government will also be seeking to work with councils to come up with best practice for victims to transition into a community and access local services.

Further information and guidance

Under Section 49 of the Modern Slavery Act 2015 the Home Secretary must issue guidance for public authorities and other organisations on modern slavery. In October 2017 the Government announced that it would be launching a consultation on the preparation of statutory guidance on identification and support for victims of slavery.

There is guidance for front-line staff in the Home Office to help them, identify and help potential victims of modern slavery and human trafficking:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/509326/victims-of-modern-slavery-frontline-staff-guidance-v3.pdf

For first responders there is guidance on the duty to notify and the NRM form:

www.gov.uk/government/publications/duty-to-notify-the-home-office-of-potential-victims-of-modern-slavery

Modern slavery victims: referral and assessment forms:

www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms

²⁹ www.humantraffickingfoundation.org/sites/default/files/Trafficking%20Survivor%20Care%20Standards%202015.pdf

There are a number of non-government organisations (NGOs) councils can contact to discuss modern slavery or receive further information from including:

- Human Trafficking Foundation
- Unseen
- ECPAT UK
- The Salvation Army
- Migrant Help
- The Medaille Trust
- Kalayaan
- Barnardo's.

This is not an exhaustive list of national organisations, and there may also be local or regional organisations and partnerships which councils can talk to as well.

There is also a 24/7 Referral Helpline hosted by The Salvation Army on 0300 3038151 or the Modern Slavery Helpline on 08000 121 700.

Brixton, Lambeth, London

Autumn 2013

Three women were rescued from a residential address in October 2013 having been held against their will for more than 30 years. Aishah Wahab, a 69-year-old Malaysian woman and Josephine Herivel, a 57-year-old Irish woman met the male suspect, also known as “Comrade Bala” in London through a shared political ideology, as he was the former Maoist leader of the Workers’ Institute of Marxism–Leninism–Mao Zedong Thought. Rosie Davies, a 30 year old British woman is thought to have spent her whole life in servitude under Balakrishnan.

In January 2016, 73-year-old Aravindan Balakrishnan was sentenced to 23-years imprisonment.

To experience the story in full, visit:
www.thedarkfigure.co.uk



Supporting victims

Depending on the age and needs of victims of modern slavery, councils may have statutory responsibilities to provide support to them. This section outlines what these are, and how processes and responsibilities differ in relation to child and adult victims of modern slavery.

Safeguarding: the legislative context

Children

Under the Children Act 1989, where a council has reason to believe that a child (irrespective of immigration status) may suffer, or is suffering, significant harm, they are under a duty to investigate to decide whether any action is needed to protect the welfare of that child.

Guidance from the Home Office on child trafficking is clear: 'child trafficking is child abuse. When an agency comes into contact with a child who may have been trafficked children's services and police should be notified immediately. All children, irrespective of their immigration status, are entitled to protection'.

The Home Office guidance also highlights that: 'Any child who is recruited, transported or transferred for the purposes of exploitation is considered to be a trafficking victim, whether or not they have been forced or deceived. Even when a child appears to have submitted willingly to what they believe to be the will of their parents or accompanying adults, it is not considered possible for a child to give informed consent'.³⁰

³⁰ www.ecpat.org.uk/sites/default/files/nrm_first_responder_guidance_child.pdf

Local government responsibilities around child slavery are, therefore, part of a council's existing responsibilities, with the addition of specific responsibilities around referrals (as set out in the previous section).

Local authorities are recommended to nominate a local professional who can develop specialist knowledge in relation to trafficked children – a 'local trafficked children lead' – and act as an adviser to other professionals in cases where the concerns in relation to a child are related to trafficking. Your local area may have a trafficked children toolkit to help with identification of children that have potentially been trafficked. An example of this would be the London Safeguarding Trafficked Children Toolkit which can be accessed via the Croydon Council website:

www.croydon.gov.uk/sites/default/files/articles/downloads/lonsafetraff.pdf

Adults

The Care Act 2014 sets out local responsibilities and roles for assessing and supporting adults in need of care and support. It outlines how councils should carry out a 'needs assessment' where it appears that an adult may have care and support needs. Key to this assessment is meeting eligibility criteria around how 'a physical or mental impairment or illness' impacts on being unable to achieve certain specified outcomes such as getting dressed or preparing food and whether this then has a significant impact on wellbeing.

If the individual is eligible for support under the Care Act, the Act is clear that it is for local authorities to decide what support or services people are eligible for when they are assessed as having care and support needs, dependent on their financial circumstances. The 'care and support planning process' is used to help decide the best way to meet the person's needs, the cost of arranging the necessary care and support for that person and where the care should be provided.

The Act also set out local responsibilities and roles for protecting adults assessed as having care and support needs from abuse or neglect for the first time in legislation. Adult safeguarding duties apply to any adult who:

- has care and support needs as defined by the Act
- is experiencing, or is at risk of, abuse or neglect
- is unable to protect themselves because of their care and support needs.

The Act requires that local authorities must make enquiries, or cause others to do so, if it believes an adult is experiencing, or is at risk of, abuse or neglect. An enquiry should establish whether any action needs to be taken to prevent or stop abuse or neglect and if so by whom, commonly called a 'Section 42' duty.

Victims of modern slavery therefore may not necessarily have the impairment or injury that would meet eligibility for care and support under the Act. However, there may be victims of modern slavery identified via local safeguarding processes; and there may be victims of modern slavery who are subsequently identified as having care and support needs, and thus will be entitled to support under current legislation later in the process.

Councils will recognise they have a role in protecting vulnerable adults at risk. Councils and their partners will wish to develop other routes that ensure that adult victims of modern slavery who are not eligible for support under the Care Act obtain any other

support from the council they are eligible for and are signposted to any support available locally. The reform of NRM should lead to greater clarity around how adult victims of modern slavery are supported before and after referral.

Differences between children and adults safeguarding

Safeguarding adults differs from the safeguarding and protection of children in a number of ways, including the different legislative basis to each. A key difference is that while there is a legal expectation that children are protected from physical or psychological damage, adults with mental capacity have a right to make their own choices, take risks, be free from coercion, and to make decisions about their own safeguarding plans. Reflecting this, under current Home Office first responder guidance, a referral cannot be made to the NRM unless the adult gives informed consent to the referral.

Adults without mental capacity have legal safeguards under the Mental Capacity Act 2005 and must have the representation of an advocate or representative to act in their best interests. An independent advocate to represent and support an adult where the adult has 'substantial difficulty' in being involved in safeguarding enquiry or review and where there is no other suitable person to represent and support them.

Partnership working

Councils will be working with partners to safeguard children as outlined in the statutory guidance 'Working Together to Safeguard Children', for example through local safeguarding partnerships and work with schools. These partnerships should be utilised to develop strong responses to the issue of modern slavery, from prevention, to identification of potential victims, to post-referral support. Responding to child sexual exploitation, professionals should be aware that children may have been trafficked prior to exploitation, and of the vulnerabilities of looked after children.

The Care Act gives local authorities overall responsibility for adult safeguarding locally. However, it also recognises that safeguarding people requires partnerships with other statutory bodies, close working with other key organisations and greater awareness from people in their communities. It requires that councils:

- lead a multi-agency local adult safeguarding system that seeks to prevent abuse and neglect and stop it quickly when it happens
- set up a statutory safeguarding adult board (SAB) including the local authority, NHS and police, which will develop, share and implement a joint safeguarding strategy
- cooperate with each of its relevant partners in order to protect the adult and in turn, each relevant partner must also cooperate with the local authority
- assure itself that local safeguarding arrangements are effective and that all partners act to help and protect adults in its area.³¹

The Care Act also gave councils a general duty to promote the wellbeing of the wider population in their communities. Action to safeguard adults should include:

- promoting wellbeing and prevent abuse and neglect from happening in the first place
- ensuring the safety and wellbeing of anyone who has been subject to abuse or neglect
- taking action against those responsible for abuse or neglect taking place
- learning lessons and making changes that could prevent similar abuse or neglect happening to other people.

In meeting this duty, local areas will choose how safeguarding adult boards discuss and report on the many complex issues which can contribute to the wellbeing of its community and the prevention of abuse and neglect.

³¹ www.scie.org.uk/care-act-2014/safeguarding-adults/safeguarding-adults-boards-checklist-and-resources/

However, there may be other local partnerships that will take the lead on issues such as modern slavery, as well as other key issues associated with police and the criminal justice system such as hate crime, domestic violence, forced marriage, Prevent, female genital mutilation, and sexual exploitation.

Key considerations for councils

Safeguarding: local leadership and scrutiny

Growing awareness of the prevalence of abuse in care and health makes it all the more urgent and necessary for local leaders to ensure that everyone, including ward councillors, council staff, the voluntary sector and the general public are made aware of abuse and neglect, how to recognise and report it, who is responsible for intervening, and what people's rights are to protection, support, choice and advocacy.

Local leaders can play a key role in reinforcing this need for collective responsibility for safeguarding. They can help build the system leadership needed to ensure that every local partner is clear what their responsibilities are and is able to communicate what the local safeguarding system is to local people. They should know what questions to ask to hold to account those responsible for adult safeguarding, including ensuring that everyone is following agreed multi-agency procedures and that appropriate links are made between agencies so that people at risk and needing help are not missed.

There are also crucial roles for local leaders in examining how safeguarding is experienced by local people, how people were consulted and involved in developing policies and monitoring services, and how they were involved in their own safeguarding plans and procedures. Councillors can have a key role in ensuring a focus on outcomes and a proportionate approach to risk, rather than just on the process of safeguarding.

Overview and scrutiny committees can also play a vital role in challenging their councils, and others, to justify their actions, or lack of them. There may be other partnership structures used locally to discuss modern slavery, dependent on local circumstances and capacity.

Whatever route is chosen, local leaders will want to assure themselves that clear governance processes are in place to discuss and continually improve the response to, and support for, victims and potential victims of modern slavery.

Access to housing

After exiting the support provided by the NRM, and depending on an individual's circumstances, their next step may be to approach a council for housing if they are staying in the UK. Homelessness legislation provides a framework for councils to decide whether an individual is owed a statutory duty by the councils. Council policies will also take case law and the wider legal framework into account. The Homelessness Code of Guidance for Local Authorities will shortly be updated to meet the requirements of homelessness legislation and to include information on the Homelessness Reduction Act. It also will include information on modern slavery.

Decisions on whether a duty is owed by the council ultimately rely on the judgement of the officer reviewing the application. Whilst they must have regard to legislation and case law, councils will take account of each person's needs and circumstances in making a decision on their legal obligation.

Homelessness services are busy front-line services. Housing officers will be used to dealing with people who are vulnerable and have suffered traumatic experiences. The hidden nature of modern slavery can make it difficult to detect, particularly if the victim is reluctant to reveal their experiences. Front-line staff can play an important role in supporting victims of modern slavery.

Training, appropriate pathways and joint working with other partners can help housing staff support these opportunities.

Many councils are under significant pressure to provide housing, including temporary accommodation for homeless people. Councils will do their best to house people in appropriate accommodation, within the constraints of what is available.

Settling someone into accommodation is an opportunity to ensure that they are adequately supported and can be protected from further exploitation. Housing Services will not have the resources or expertise to do this on their own, and joint working will be required to bring key partners together.

No recourse to public funds

Some victims may exit the NRM and have no recourse to public funds (NRPF). NRPF is a term used for people who are subject to immigration control and have no entitlement to welfare benefits, to Home Office asylum support or to public housing.³² There are provisions which require local authorities to provide some people with NRPF with housing and/or financial support in order to prevent homelessness or destitution. Such assistance can be provided to adults requiring care and support as defined by the Care Act due to a disability, illness or mental health condition, or young people who were formerly looked after by a local authority, for example, because they were an unaccompanied asylum seeking child (UASC), or other separated migrant child.

³² www.nrpfnetwork.org.uk/information/Pages/default.aspx

Peterstone, Newport

2000

33-year-old Darrell Simester from Kidderminster, Worcestershire, was picked up from the side of a dual-carriageway whilst hitchhiking in South Wales. For the next 13 years, Darrell Simester lived in a rat infested shed and then a cold, squalid caravan on the property of David Daniel Doran, and was made to work sixteen hour days for no money with only a horse trough to wash in.

2014

Darrell Simester's family found him at the Doran's farm following a social media campaign. In October 2014, David Daniel Doran was jailed for four and a half years.

To experience the story in full, visit:

www.thedarkfigure.co.uk



Newcastle City Council

Over recent years, Newcastle City Council has been involved in a number of police operations in relation to modern slavery, trafficking and exploitation (MSTE). Their involvement led to the council identifying a role in supporting victims of MSTE, and highlighted that work was required to ensure appropriate accommodation was available within the city.

The council identified that it needed to:

- implement a holistic victim strategy appropriate to the needs of the individual
- recognise the housing and supporting needs of people who have been made homeless because of MSTE
- acknowledge the impact MSTE support has on council budgets and resources.

Issue

The council identified a role in providing emergency accommodation whilst potential victims are awaiting a reasonable grounds decision. The council found that due to the complexity of individuals' circumstances and the interaction between homelessness legislation and MSTE, finding appropriate emergency accommodation was challenging.

Pre-planned strategies are essential to ensure provisions are in place for the large numbers predicted in planned operations.

Newcastle have experience of planned responses for; women and men exploited for labour, sexual exploitation of women, and victims of domestic servitude. The council have also responded to the need to house individuals who have fled from a situation of MSTE and self-presented. This has highlighted that one size does not fit all, and a flexible accommodation solution is needed.

Victim strategy

The council has an agreed hierarchical strategy for all those who present as victims of MSTE. The accommodation type and layout is integral to delivering this victim centred strategy:

- initial and ongoing **safeguarding** within either a victim reception centre (VRC) or specialist accommodation
- **support** from all appropriate agencies to identify and address social care, health and welfare needs
- provide **evidence** for prosecution through the completion of Achieving Best Evidence (ABE) interviews in a supportive environment.

Accommodation options

Three operating models have been explored and used to date.

Homelessness accommodation

This type of accommodation cannot be guaranteed; victims of MSTE may not be deemed as being statutorily homeless, and this resource is in high day-to-day demand. This accommodation is also not designed to support a multi-agency approach of this type.

Dormitory style

Unoccupied council offices provided dormitory style accommodation. This incorporated beds, a communal area, showers and multiple ABE suites. Although this accommodation was suitable for certain situations, it was deemed unsuitable for victims who have additional vulnerabilities or have experienced additional trauma. It is also not appropriate should one victim self-present and require short-term accommodation.

Self-contained flats

The options above worked but the council felt that it could do more and provide more appropriate alternative accommodation. Long-term low demand void properties were identified within existing council housing stock and was allocated to support the council's MSTE response.

A multi-agency approach is adopted when supporting victims so all partners were consulted through operational planning meetings to determine the most appropriate use of the properties. Partners included:

- NHS England, who provide onsite medical assessments and subsequent referrals to sexual health and other specialist services
- Northumbria Police, who conduct ABE interviews at the VRC and manage the site if used for pre-planned strikes
- British Red Cross, who provide victim support.

Council services, including:

- Strategic Housing who manage the allocation, refurbishment, repairs and management of the properties in partnership with Your Homes Newcastle and Building and Commercial Enterprise teams
- Adult Safeguarding who carry out victim assessments
- The Homelessness Housing Advice Team
- Adult Safeguarding and Domestic Violence teams who provide advice on the potential needs of victims and appropriate use of the VRC
- Resilience Planning Team who coordinated the approach.

Support was also required from:

- Tyne and Wear Fire and Rescue Service who provided advice and materials to ensure the flats were fire safety compliant
- teams working with migrants who have no recourse to public funds
- Environmental Health who undertook housing assessments and provided fire safety advice.

Regional use of the accommodation

As MSTE operations often cross boundaries it was recognised that partners could not support multiple VRCs. As such a Memorandum of Understanding was established between two council areas to allow all victims, irrelevant of location to be housed in the Newcastle VRC.

Going forward

The current accommodation is only a short-term option; the council also believe improvements can be made. They are therefore looking for alternative accommodation. This will be developed with all partners including other councils to identify a VRC that can be a fully utilised resource that offers a flexible approach to victim accommodation and support, whilst ensuring the police can achieve best evidence.

Sandwell Metropolitan Borough Council

In June 2016 Sandwell Metropolitan Borough Council's Private Sector Housing Quality Team (PSH) attended a meeting at West Bromwich Police Station and became aware of the problem of modern slavery in the borough.

Following that meeting the council immediately became members of the West Midlands Anti-Slavery Network. They set up a council-wide modern slavery task and finish group to establish that they were acting in accordance with the Modern Slavery Act 2015. The group then established policies, procedures, awareness raising, training and reporting mechanisms to identify and report modern slavery.

The PRS Housing Quality Team set up a Sandwell Housing Operation Partnership (SHOP) group which is a partnership of council officials, West Midlands Police, West Midlands Fire Service and Hope for Justice to investigate issues with properties which may result in modern slavery issues.

The council also worked with The Salvation Army, Hope for Justice and a range of interpreters.

The issue

Through this group, the council became aware of intelligence from the police which informed us that there were cases of modern slavery at two recycling plants in West Bromwich and some of the victims were living in properties in Sandwell.

The council therefore took part in Operation Sunlight. It was led by the police and Sandwell PSH team were involved. There were joint raids on two residential properties and two commercial recycling centres in Sandwell.

Thirteen victims of modern slavery were found being paid less than £1 per hour. They were taken from those addresses to a reception centre. Victims were offered the chance to enter the National Referral Mechanism and six of the thirteen victims decided to enter the NRM.

Three suspects were arrested, interviewed and released on bail. Their trial is pending.

The Fire Service served a Prohibition Order on a flat housing two of the victims. The flat contained category one health and safety hazards, which posed a serious threat to the health or/and safety of those living there.

Further information will be shared between the council and police to strengthen the case for proceeding with the Proceeds of Crime Act.

Lessons learned

Operation Sunlight introduced the team to working with the police on an organised raid. In most cases, however, discovery of modern slavery will not have the backing of the police in this way.

The council learned that they quickly needed to set up a system whereby the whole of the council was made aware of modern slavery immediately and a robust system of reporting was introduced. This has now been established and went live on 1 September 2017. Further in-depth training will be provided for the staff that are most likely to be in a position to identify victims.

What has been the impact?

This work has raised awareness considerably and the council has already provided awareness training to organisations outside the council, eg private landlords, voluntary sector organisations and Department for Work and Pensions.

Community safety and disruption

Modern slavery is a complex, serious and often organised crime. Under Section 17 of the Crime and Disorder Act councils have a duty to do all that they reasonably can to prevent crime and disorder in their areas, which will include modern slavery and trafficking. There are a range of crimes where councils may come across victims of modern slavery, including county lines, child sexual exploitation, gangs, violent crime, drugs and begging, amongst others.

Councils are a part of a number of partnerships whose work may have an impact on tackling modern slavery, including community safety partnerships and serious and organised crime partnerships. Information sharing through these partnerships is key to ensuring that disruption activities and enforcement work is targeted effectively. Many parts of the council have powers of entry and inspection that can be used to disrupt the activities of traffickers and criminal networks including; Trading Standards, environmental health, planning enforcement, and housing inspection.

County lines exploitation

County lines is a widespread form of harm and is present in many areas. It is a major cross cutting issue involving trafficking, gangs, drugs, violence safeguarding, criminal and sexual exploitation and missing persons.

County lines is the police term for urban gangs supplying drugs to suburban areas and towns using dedicated mobile phone lines – these are the county lines. These phone numbers are often passed down. It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as ‘cuckooing’. Victims may be trafficked to new locations to sell drugs and therefore could be considered to enter the NRM.

The Home Office has produced guidance on county lines to support local authorities:

www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines

Role of community safety partnerships

Community safety partnerships (CSPs) are statutory partnerships bringing together councils, fire and rescue services, police, health and probation services as responsible authorities. They work together to reduce crime and disorder and anti-social behaviour, reduce reoffending and combat drugs and alcohol misuse.

They do this through a range of statutory duties including:

- setting up a strategic group to direct the work of the partnership
- regularly engaging and consulting with the community about their priorities and progress achieving them
- setting up protocols and systems for sharing information
- analysing a wide range of data, including recorded crime levels and patterns, in order to identify priorities in an annual strategic assessment
- setting out a partnership plan and monitor progress
- producing a strategy to reduce reoffending
- commissioning domestic violence homicide reviews.

CSPs bring together a range of public bodies to assess the crime profiles of their local area, share information and work with local police and crime commissioners (PCCs).

PCCs are under a duty to cooperate with community safety partnerships to reduce crime and disorder and re-offending. When a PCC puts together their police and crime plan for their area they must have regard to the priorities of the responsible authorities in their force area, while the CSPs will have to have regard to the objectives in the PCC's police and crime plan when exercising their functions.

Serious and organised crime

As previously stated, serious and organised crime groups are engaged in modern slavery offences. The Government's Serious and Organised Crime Strategy set out ways of working to tackle this issue locally. The strategy required PCCs to establish local multi-agency groups to tackle serious and organised crime, representatives would be drawn from local authorities, education, health and social care and Immigration Enforcement, amongst others. As a part of the work to tackle serious and organised crime, police forces and the NCA have to produce serious and organised crime local profiles to support multi-agency partners, including councils, to:

- develop a common understanding among local partners of the threats, vulnerabilities and risks relating to serious and organised crime
- provide information on which to base local programmes and action plans
- support the mainstreaming of serious and organised crime activity into day-to-day policing, local government and partnership work
- allow a targeted and proportionate use of resources.³³

The local profile has been used to brief local multi-agency partnerships and other policing and law enforcement teams on the threat from serious and organised crime in their area. The local profile should therefore provide partners with a common understanding of the risks of modern slavery within their own areas.

These groups provide an opportunity to share information and to support common activity across partners on modern slavery in their areas to deliver a coordinated approach to disruption and other activities based on local intelligence.

³³ www.gov.uk/government/uploads/system/uploads/attachment_data/file/371602/Serious_and_Organised_Crime_local_profiles.pdf

It is important that people within councils know how, and who, to feed in their concerns around serious and organised crime activities to, and that there is an understanding of the potential risk of modern slavery within these activities.

Anti-social behaviour

Councils and their partners may also consider the powers given to them by the Anti-Social Behaviour, Crime and Policing Act 2014 in their disruption activities. Again these powers are best used in a coordinated way across all partners.

Disruption activities could include community protection notices for people, businesses or organisations committing types of anti-social behaviour or closure orders to quickly close premises being used or likely to be used to commit nuisance or disorder. These could be used in cases where other approaches have failed.

Use of local regulatory services to identify, disrupt and investigate modern slavery

Earlier sections of this guide have already set out how various council services may encounter victims of modern slavery through their routine work overseeing and supporting local businesses and housing. Alongside their potential role in identifying victims of modern slavery, local regulatory services, and specifically the powers conferred to them, can also be an important tool in seeking to disrupt modern slavery, as they can also be with other forms of serious and organised crime.

Local authority regulatory services include Trading Standards, environmental health and licensing, planning, building control and private sector housing, and fire safety. Notably, these services have relatively broad powers of entry that may be exercised where there are concerns about a specific business or premises under a relevant piece of legislation. In prescribed circumstances, authorised officers of the council will be able to: enter into a premises; seize and detain goods and documents; sample products, processes and the environment; require certain actions to be stopped or undertaken; bring legal proceedings, and initiate injunctive actions and seek the recovery of proceeds of crime. The table on page 34 sets out just some of the areas in which councils have powers that may be used to disrupt modern slavery.

Overview of local regulatory powers which may prove useful in disrupting modern slavery

Legislation	Power	Requirements
Food Safety and Hygiene (England) Regulations 2013	Powers of entry (regulation 16) Power to seize and detain any records	Authorised officer has the right to enter at any reasonable time upon producing documented authorisation, to ascertain if there has been any breach of the 2013 (or 2002) regulations and to perform functions under the regulations. An authorised officer can be accompanied by any such persons the officer considers necessary. If admission is refused a warrant can be obtained from the magistrates.
Health and Safety at Work Act 1974	Powers of entry (section 20) Request to examine any document, equipment, premises or part of them, and detain any articles or substances	Authorised officer has the right to enter at any reasonable time upon producing documented authorisation. If obstruction is anticipated, the authorised officer can be accompanied by the police.
<ul style="list-style-type: none"> • Town and Country Planning Act 1990 • Planning (Listed Building and Conservation Areas) Act 1990 • Hazardous Substances Act 1990 	Powers of entry (various sections under the three Acts)	Some powers afford right of entry with a warrant, others without.
<ul style="list-style-type: none"> • Environmental Protection Act 1990 • Housing Act 2004 	Powers of entry under section 81 and section 239 respectively.	Under the EPA 1990, any authorised officer may enter a premises at any reasonable time for the purposes of ascertaining whether or not a statutory nuisance exists, or for the purposes of taking action. Under the HA 2004, there is a requirement to give at least 24 hours written notice of a visit unless evidence proves that the premises is an HMO and that notice would negate the purpose of the visit.
Consumer Rights Act 2015, Schedule 5	Power of entry (section 23) Power to seize and detail goods (section 28) or to retain documents required as evidence (section 29)	Section 32 of the Act provides for power to enter a domestic premises with a warrant issued by a justice of the peace.

Source: Cornwall Council

These powers have proved extremely useful in enabling councils and their partners to jointly enter or otherwise target a business or premises suspected of involvement in crimes such as modern slavery and child sexual exploitation. In relation to modern slavery specifically, councils can work collaboratively with partners such as the police, Gangmasters and Labour Abuse Authority (GLAA) and HM Revenue and Customs (HMRC), all of whom have an interest in investigating labour market offences and slavery.

The GLAA has recently expanded its remit to include investigating offences in the Employment Agencies Act 1973, National Minimum Wages Act 1998, and the Modern Slavery Act 2015. Their expanded remit provides a number of opportunities for close cooperation with councils in a number of areas. Where a council has concerns about suspected modern slavery in its area (or other criminal activity), it should consider whether a joint operation and investigation with other partners is appropriate.

Councils' statutory powers support joint investigations by allowing for the sharing of information in support of the prevention or detection of crime and in support of legal proceedings. The LGA has a memorandum of understanding on data sharing with HMRC which all councils are able to sign up to in order to share and receive data from HMRC. Additionally, the GLAA have a standard data sharing agreement, similar to the LGA-HMRC memorandum, which a number of councils have already signed up to and which is available to other authorities to agree to.

Cornwall County Council

In 2015, Cornwall Council was one of five local authorities which took part in the Cabinet Office's Better Business Compliance pilots, which aimed to trial a different approach to securing better compliance amongst local businesses.

The pilots sought to better identify those businesses that were likely to pose the highest risk of non-compliance and to target interventions to turn the business around or to cease illegal business practices. In Cornwall there was an emphasis on tackling modern slavery and human exploitation.

Multi-agency awareness raising training was provided (including an explanation of each agency's roles, remits and powers), joint operations were undertaken (private sector housing, fire service and HMRC), and a mechanism was established for sharing intelligence and incident reports/concerns.

Since the pilot, the council has used other mechanisms to try to tackle modern slavery. The MIGWAG (Migrant Workers Action Group) is a multi-agency approach to tackling human exploitation, modern slavery and unfair/unsafe employment practices. 'Week of action' joint operations are undertaken each year, targeting those businesses (including farms) who tend to employ temporary and non-UK national employees.

Councils' and other agencies' powers of entry are used to ensure access to all businesses targeted during these weeks of action. Typically, issues are uncovered concerning unsatisfactory housing conditions, illegal immigration, minimum wage breaches, health and safety/unsafe working conditions, etc.

Finally, Cornwall has established a formal partnership arrangement, the Serious and Organised Crime Partnership, under the auspices of the Cornwall Safer Communities Partnership to address the threat of serious and organised crime, including modern slavery, child sexual exploitation, terrorism and organised crime groups, etc. Local authority regulators are represented via representatives from Trading Standards and housing.

Examples of how this arrangement has proved effective include a Trading Standards 'doorstep crime' investigation (with associated entry warrant and record examination) designed to facilitate access to a premises by police officers investigating a potential modern slavery case by diverting the attention of the offender away from the suspected victim. Similar access to restaurants suspected of using modern slavery to provide cheap labour have been arranged in conjunction with environmental health food safety officers and/or fire safety officers.

Derby City Council

The council established an information sharing agreement and multi-agency response team to develop intelligence and undertake operational responses.

Not all intelligence will lead to an arrest or police response. The council needed to consider alternative enforcement and disruption powers across the partnership group. Also, there were instances where the intelligence is insufficient and additional actions were needed to understand the potential crime.

What did the council do?

The council set up a multi-agency response team, bringing together a range of partners to:

- identify those individuals who present a serious risk of harm to individuals and communities
- identify potential victims of modern slavery
- share information in relation to criminal activity, specifically, but not limited to all forms of exploitation
- sensitively map vulnerable individuals, businesses and offenders and share information on locations, relationships, needs and concerns
- make sure of a joined up multi-agency response to incidents of modern slavery and make sure coordinated responses are made in relation to
 - enforcement
 - protection
 - disruption
 - ensure vulnerable individuals are referred to the appropriate service and/or agency responsible for meeting their needs
 - enable the most appropriate action and intervention to be developed and implemented
 - actions under Pursue and Prevent are intended to reduce the threat from modern slavery crime through disruption and deterrence
- actions taken under Protect and Prepare are intended to reduce overall vulnerability to modern slavery, through protecting vulnerable people raising awareness and resilience and improving victim identification and support.

To undertake this work the council worked with a wide number of partners including:

- Department for Work and Pensions
- Derbyshire Constabulary
- Derbyshire County Council
- Derbyshire Fire and Rescue Service
- Gangmasters and Labour Abuse Authority
- HM Revenue & Customs
- Home Office Immigration Enforcement
- The Bishop of Derby.

Lessons learned

It is critical to establish single points of contact for each service to ensure swift and accurate dissemination of information. In large organisations, it is also critical that investigating officers are aware of agreed processes and directed to engage with partners in planning operations and responses.

What has been the impact?

Whilst it is early days, the council has seen the team start to develop regular information exchanges and use of partner resources to enhance intelligence. The work to disrupt through non police powers is beginning to be evidenced – such as housing standards interventions.

Union Street, Plymouth

September 2014

Eight men were arrested on suspicion of trafficking persons into the UK for the purpose of labour exploitation during dawn raids at five properties across three neighbourhoods in Plymouth, Devon, as part of Operation Triage. Eight victims were recovered along with thirteen children, all of whom were believed to be linked to the suspects.

To experience the story in full, visit:

www.thedarkfigure.co.uk



Public procurement

Overview

The abuse of human rights in our supply chains through modern slavery is gaining greater awareness. The United Nations Guiding Principles on Business and Human Rights require that states should promote respect for human rights by the businesses which they transact with; in the UK, the Modern Slavery Act contained a number of provisions around procurement and supply chains. It sought to make supply chains more transparent for consumers and to push for a movement for the eradication of modern slavery from the supply chains of businesses operating in the UK. It requires commercial organisations, turning over in excess of £36 million annually, to report on their efforts to identify, prevent and mitigate the risk of modern slavery in their commercial operations by publishing an annual Slavery and Human Trafficking Statement.

Councils should consult with their monitoring officers on their council's position on the Modern Slavery Act 2015 and the accompanying guidance with regards to procurement and supply chains. Further information about modern slavery statements and transparency in supply chains can be found on the Government's website: www.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf

In April 2017, Parliament's Joint Committee on Human Rights recommended that 'If the Government expects business to take human rights issues in their supply chains seriously,

it must demonstrate at least the same level of commitment in its own procurement supply chains'. The same can be said of councils. Procurement of services is an important part of councils' expenditure with, local government third party revenue expenditure totalling around £60 billion a year. Councils will therefore want to ensure that the risks of modern slavery within their supply chains are understood, and can show leadership in promoting a human rights approach towards procurement.

Councils may also wish to promote an environment where local business and other public bodies are both aware of the potential for modern slavery in their supply chains for goods and services, and able to cooperate on identifying this and responding to it, for example as part of their local economic partnerships.

Steps councils can take on procurement

There are a wide range of activities councils could engage in to promote human rights, including establishing policies and processes to make sure the council's activities don't harm others and that they conduct business with respect for human rights.

Getting started

Promoting respect for human rights is not only a compliance issue, it requires action to understand supply chains, identify the risks involved and act upon them. This is what is referred to as human rights due diligence.

Councillors can play a key role in ensuring that human rights due diligence is a part of their council's procurement practice through:

- gaining organisational commitment
- promoting supplier engagement
- encouraging collaboration.

Councils should consider when is the best time to look at human rights due diligence. This may not always be during the competitive tendering process, when there may not be enough time to look into a supplier's supply chains. Councils should consider how they can work with and support the market to broaden and deepen competencies in this area as well as encourage a close working relationship with suppliers.

Gaining organisational commitment

Many public bodies have clearly defined values and have a strong commitment to sustainable and socially responsible procurement. Councillors may wish to consider how they can reflect human rights due diligence by including policy commitments in social sustainability policies and strategies. They could also consider adopting responsible procurement as a core value, to help ensure that considering the impact of purchasing decisions is at the forefront.

Awareness training, so that people can identify potential victims of modern slavery, and know what action to take when they are identified is key to ensuring that it can be tackled appropriately.

Engaging with the council's suppliers

Councils should always aim to work with suppliers on human rights due diligence, to ensure that they know what the council's strategy is and that they can work together to tackle the issue and deliver the strategy. Whilst councils may wish to end a contract if issues are discovered this can be counter-productive, as it could move the problem, and could create an atmosphere of fear and concealment in the industry.

Public authorities should work alongside suppliers to tackle the issue. Positive, proactive engagement with suppliers is necessary at all times in order to implement an effective human rights due diligence approach.

Collaborating with others

Understanding and addressing the risks for people working in supply chains is a major task for councils. It is important that councils consider how they can work in collaboration with other councils to have a greater impact and return on resources. Working with other councils on these issues could save resources and maximise the potential for a positive outcome, and will also help as a collective learning experience.

Prioritising risks

Councils can work to ensure that the risk of modern slavery in each of their supply chains is understood. This is particularly important in areas that will present higher risks for people working in them, such as services in which low pay is prevalent, eg cleaning, security and construction. Procurement staff should be able to recognise these risks.

Again councils should consider asking staff to collaborate with other councils to engage in supply chain mapping, monitoring of supply chains or factory audits, recognising that only the very largest councils are likely to have the resources to do this individually. Purchasing consortia may provide a route to do this collectively.

What is supply chain mapping? Supply chain mapping helps build a picture, locating assembly plants, component factories and sources of raw materials. This provides an overall viewpoint from which the risks can be identified – by industry, by source country, or both.

Monitoring supply chains: Once councils have identified risks in their supply chains they'll need to monitor them for potential violations. In industry and commerce, monitoring supply chains is accepted as a fairly costly activity. Councils will need to consider how they can work and share

these costs with other public authorities, with improvements in both efficiency and effectiveness. Monitoring can be both proactive and reactive.

What is a factory audit? Factory audits help identify how goods are being produced and provide a snapshot in time of the conditions in a particular factory. Audits have the advantage of systematically gathering information and those that provide the best information on a factory involve independent expert analysis of worker conditions.

Responding to human rights abuse in a supply chain

Councillors should ensure that their procurement practitioners put in place procedures to monitor performance.

Public authorities will need to consider how they respond to reports of human rights abuses in their supply chain. Councillors should ensure that practitioners develop a detailed response plan to deal with issues as they occur.

Telford and Wrekin Council

Telford and Wrekin council have developed an Anti-Slavery and Human Trafficking Policy as well as a Modern Slavery Transparency Statement.

Telford and Wrekin Council: Anti-slavery and human trafficking policy

1. Policy statement

1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4. This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the policy

2.1. The council's members and senior management team have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2. The council's service delivery managers have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4. Council employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the compliance manager.

3. Compliance with the policy

3.1. All employees must read, understand and comply with this policy.

3.2. The prevention, detection and reporting of modern slavery in any part of the council's business or supply chains is the responsibility of all those working for the council or under its control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3. Employees must notify their manager or call the confidential whistle blowing helpline as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.5. Employees should note that where appropriate, and with the welfare and safety of local workers as a priority, the council will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

3.6. If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or through the whistle blowing helpline.

3.7. The council aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The council are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that they have suffered any such treatment, they should report this immediately via the whistle blowing helpline immediately.

4. Communication and awareness of this policy

4.1. Training on this policy, and on the risk our business faces from modern slavery in its supply chains, is available via Ollie and will form part of the induction process for all individuals who work for the council, and regular training will be provided as necessary.

4.2. The council's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate thereafter.

5. Breaches of this policy

5.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2. The council may terminate its relationship with other individuals and organisations working on our behalf if they breach this policy.

Telford and Wrekin Council's Transparency Statement is available on their website:

www.telford.gov.uk/download/downloads/id/5287/modern_slavery_transparency_statement.pdf

Another example of a transparency statement is available on Nottinghamshire County Council's website:

www.nottinghamshire.gov.uk/media/117112/modern-slavery-and-human-trafficking-statement-appendix.pdf

Key considerations for councils

Councils should consult with their monitoring officers on their council's position on the Modern Slavery Act 2015 and the accompanying guidance with regards to procurement and supply chains.

Councils may wish to consider how they can incorporate human rights due diligence within their procurement practices and what opportunities there are for working jointly with other local authorities on some of these issues. Working in conjunction with suppliers and other councils will help to ensure that there is a shared awareness of the issues and commitment to tackling them. This will also enable councils to share resources to deal with some of these issues.

Councils should consider what training is required within their councils and who needs to be trained to recognise the issues. It is important to consider what levels of training different people within the council may need and what specialist training may be necessary. Again joining up with other councils may be helpful to consider when looking at training.

Role of partners in tackling modern slavery

Overview

As has been highlighted throughout this document, the broad nature of the threat of modern slavery means that effective partnership working is key to tackling the issue successfully.

Community safety partnerships, local serious and organised crime partnerships, health and wellbeing boards, local strategic partnerships, as well as local safeguarding boards all have a role to play in identifying victims, sharing information, tackling modern slavery and supporting victims.

Joint working means that areas are better able to tackle modern slavery through a common understanding of the risk of modern slavery in their area, sharing intelligence and targeting disruption activities effectively.

There are some dedicated regional and local partnerships on modern slavery which are already active throughout the country and which may provide training or tools that can be used locally. These are some examples of existing modern slavery partnerships, though this is not an exhaustive list:

- East Midlands – East Midlands Strategic Migration Partnership
- Hampshire and the Isle of Wight – Modern Slavery Partnership
- South East – South East Strategic Migration Partnership
- South West – Anti-Slavery Partnership
- Wales – Welsh Anti-Slavery Leadership Group
- West Midlands – West Midlands Anti-Slavery Network

- West Yorkshire – West Yorkshire Anti-Trafficking and Modern Slavery Network.

Councils may also wish to consider contacting their Regional Strategic Migration Partnership for more advice or information.

In 2017 the Independent Anti-Slavery Commissioner in partnership with the University of Nottingham carried out a research project mapping out multi-agency modern slavery partnerships, identifying a range of local, regional and sub-regional partnerships across the UK. A final report called 'Collaborating for Freedom: anti-slavery partnerships in the UK'³⁴ was published in November 2017 and digital map of all UK modern slavery partnerships has been produced and is publicly available: <http://iascmap.nottingham.ac.uk/about>.³⁵

It is worth considering how councils can join up across council and police boundaries. Whilst councils will need to think how they can join up with other agencies in their immediate local area, modern slavery and trafficking traverses organisational boundaries, covering wider geographical areas. For instance in county lines exploitation, the victim's home council and the council where the exploitation is taking place may be many miles apart however the issues in tackling it will need both councils to work together.

³⁴ www.antislaverycommissioner.co.uk/media/1186/collaborating-for-freedom_anti-slavery-partnerships-in-the-uk.pdf

³⁵ www.antislaverycommissioner.co.uk

Key partners and partnership arrangements

There are a number of partners that councils can work with to share information and direct work on tackling modern slavery and supporting victims, including:

Organisation	Role
Police	<p>The police's primary role in tackling modern slavery is to investigate, though local forces may also be involved in a range of preventative activities with partners.</p> <p>Regional Organised Crime Units (ROCU) are responsible for coordinating and supporting the regional response to serious and organised crime. The police also produce local profiles of the threats to their local areas from serious and organised crime.</p> <p>The police should work jointly with local authority children's social care, and should follow the procedures prepared by their local safeguarding children board and in accordance with Working Together to Safeguard Children: www.gov.uk/government/publications/working-together-to-safeguard-children</p>
Police and crime commissioners	<p>The police and crime commissioner (PCC) is a directly elected official responsible for creating a five-year policing plan based on local priorities, appointing the chief constable, deciding the police budget and council tax precept alongside commissioning for survivors of crime and commissioning groups to work on local priorities.</p> <p>The PCC's role is specifically mentioned in the Modern Slavery Strategy. The strategy supported PCCs and chief constables reviewing their approach to tackling modern slavery, ensuring it responds to the local threat and is reflected within their own policing plans and strategies. PCCs can work with community groups on specific projects around the issues, and with community safety partnerships.</p> <p>In January 2016, the PCC for West Yorkshire and Association of Police and Crime Commissioners (APCC) lead for modern slavery and human trafficking, Mark Burns-Williamson, launched the National Anti-Trafficking and Modern Slavery Network. This is a forum for PCCs in England and Wales to specifically focus on human trafficking and modern slavery, raise awareness of the nature and scale of the issue and help enable them to hold their forces to account more effectively on their response to modern slavery crime.</p>
Education	<p>Schools, colleges, etc may be aware of pupils in their schools who may be vulnerable to being trafficked or exploited through modern slavery. Schools can ensure that pupils have access to information, appropriate advice and support if pupils are considered vulnerable to trafficking or modern slavery. Safeguarding leads in schools should also be aware of the practice and have the ability to deal with trafficking or modern slavery claims.</p>
Local criminal justice boards	<p>Local criminal justice boards (LCJBs) bring together a number of criminal justice system agencies, including the police, the Crown Prosecution Service, the Courts and Tribunal Service, the Prison Service, probation trusts, and the Youth Offending Service. The role of the LCJB is to coordinate activity and share responsibility for delivering criminal justice in their areas.</p> <p>LCJBs can help to ensure that each part of the criminal justice system works closely on suspected case of human trafficking and modern slavery.</p>
Local child safeguarding arrangements	<p>The council, NHS clinical commissioning group and police in each local authority area have a responsibility under the Children and Social Work Act 2017 to work together to safeguard and promote the welfare of children in their area. They must also work with any other agencies that they consider relevant within the area to safeguard children.</p>

Organisation	Role
Local enterprise partnerships	<p>Local enterprise partnerships (LEPs) are voluntary partnerships between councils and businesses set up to help determine local economic priorities and lead economic growth and job creation within the local area.</p> <p>LEPs may provide a forum for raising the issue of modern slavery with a wide variety of partners, can provide a forum for discussion and maybe able to raise awareness of the risks of modern slavery in supply chains.</p>
Local strategic partnerships	<p>Local strategic partnerships (LSPs) are non-statutory bodies, with membership that includes parts of the public, private, voluntary and community sectors, who are working in the local area. LSPs encourage different initiatives and services to support one another and work together more effectively.</p> <p>LSPs can play a part in information sharing, ensuring that the signs of slavery are well known in the local area. They may be able to engage in awareness raising activities.</p>
Health and wellbeing boards	<p>Health and wellbeing boards produce joint strategic needs assessments (JSNAs), which analyse the needs of the local population to inform the commissioning process for health services, and encourage closer working between health and social care.</p>
Multi-agency safeguarding hubs	<p>Some local authorities have developed multi-agency safeguarding hubs (MASHs), which include members from children's social care, the police, health and education as well as other local partners. MASHs facilitate early information sharing between agencies to help professionals identify children or vulnerable adults at risk of harm, and work together to ensure they are effectively safeguarded.</p> <p>Children who are at risk of exploitation may be referred to a MASH, and using the multi-agency protocols the MASH has in place a coordinated and cross-organisational response to modern slavery referrals can be made.</p> <p>MASHs may already be doing work with victims of modern slavery through their work in child sexual exploitation or county lines exploitation.</p>

Other organisations

There are a number of other organisations that work to tackle modern slavery.

Organisation	Role
Gangmasters and Labour Abuse Authority	<p>The Gangmasters Licensing Authority was created in 2004 to police labour exploitation, using both its licensing regime and criminal investigations of unlicensed supply of labour. Often unlicensed supply has been used to mask labour exploitation. In the Immigration Act 2016 the GLA was re-formed into the Gangmasters and Labour Abuse Authority (GLAA). As part of this change it was given powers to investigate labour market offences in addition to the offences in the Gangmasters (Licensing) Act 2004.</p> <p>It now has the authority in England and Wales to investigate offences in the Employment Agencies Act 1973, National Minimum Wages Act 1998, and the Modern Slavery Act 2015. It can use the new sanctions of labour market enforcement undertakings and orders to bring about compliance where prosecution is not deemed appropriate. It also has the authority to independently apply for Slavery and Trafficking Risk Orders and Slavery and Trafficking Prevention Orders. To enable it to provide this wider response the GLAA has been granted additional powers under the Police and Criminal Evidence Act 1984, including arrest and search and seizure powers.</p> <p>The GLAA is the UK's specialist labour exploitation inspectorate, recognised as such internationally by the ILO, and which works closely with Europol projects, and other EU labour inspectorates on cross border investigations into alleged labour exploitation.</p>
National Crime Agency	<p>The National Crime Agency's role is to protect the public from the most serious threats by disrupting and bringing to justice those serious and organised criminals who present the highest risk to the UK. Modern slavery is one of these risks.</p> <p>The NCA's Modern Slavery Human Trafficking Unit (MSHTU) is a multi-agency team. They provide a central point of expertise, support and coordination for the UK's response to modern slavery and the trafficking of human beings working within the UK and internationally</p> <p>They provide updates of the NRM figures as well as publishing the 'National Strategic Assessment of Serious and Organised Crime' including modern slavery:</p> <p>www.nationalcrimeagency.gov.uk/publications/807-national-strategic-assessment-of-serious-and-organised-crime-2017/file</p>
Director of Labour Market Enforcement	<p>Professor Sir David Metcalf CBE is the current Director of Labour Market Enforcement.</p> <p>The Director of Labour Market Enforcement is responsible for setting priorities for these enforcement bodies:</p> <ul style="list-style-type: none"> • Employment Agency Standards Inspectorate (EAS) • Gangmasters and Labour Abuse Authority (GLAA) • HMRC National Minimum Wage (HMRC-NMW). <p>The Director will set a strategy and create an intelligence hub enabling data sharing between the director, enforcement bodies and other bodies with intelligence.</p>

Essex and Kent Police and partners

Issue

Several intelligence reports were received suggesting that there were potential victims of modern slavery on a Traveller family site who may have been subjected to forced labour. Eastern European nationals were reported to be living under inhumane conditions, not being paid, being assaulted, not being fed and working 20 hours a day. The police worked alongside the Department for Work and Pensions, Essex Fire and Rescue Services, HMRC, Immigration Enforcement and the local council to research and develop the intelligence further. The RSPCA were also involved.

What did you do?

A warrant was secured for a site check to be carried out. It was established that every statutory agency had an interest in the site and the family living there. The warrant was executed and eight Eastern European nationals were found living on the site. Out of the eight, four were a family – a mother and three children in one caravan – and four were men living in two other caravans.

The state of the caravans was poor. There were no cooking facilities, there were communal portable shower facilities, there was general waste surrounding the caravans, there were no food storage facilities, no heating facilities, and the site was guarded by dogs. The individuals also did not speak any English and they were reported to have poverty or homelessness present, as well as potential alcohol or drug dependency and debt bondage.

The workers reported similar patterns in their recruitment and arrival on the site. Word of mouth had secured the workers a contact that made all the arrangements for the worker's transport into or within UK, their arrival on the site and the working conditions, which included a hot meal a day and cheap accommodation in caravans at £40 a week rent per person.

Once on site, Essex Fire and Rescue Service, Immigration teams, the Police and the RSPCA all began talking to all the parties present – this included 14 members of the family as well as the eight Eastern European individuals living on the site and believed to be working for the family.

It was established that the eight individuals were not willing to engage with the agencies present and gave very similar answers to questions, which lead to some concerns about the responses being potentially scripted. Only three of the men choose to be spoken to in more detail at the police station where they maintained the answers given on site.

Lessons learned

The visit helped the partnership to gather useful information for ongoing inquiries and helped to establish the use a partnership approach. It improved understanding of what the different agencies could do to support further action, such as monthly fire service checks to ensure the caravans are to the standard expected if tenants are present.

They also ensured that the individuals working on the site are supported by the partners present to ensure they are acknowledged as workers and their rights as such are respected. Following the visit they have been able to carry out a number of visits on other sites that were identified through intelligence sharing across the partners.

The multi-agency approach is now standard practice in all site checks, ongoing investigations and in developing new intelligence.

What has been the impact?

The multi-agency approach has had a positive impact on victim identification and safeguarding and data capture. It has also enabled the use of a range of different specialist powers and investigative options as well as penalties such as restrictions/ audits/fines. It has helped to focus resources purposely and with greater success.

Annex A

Indicators of modern slavery

Adult victims

General indicators for modern slavery

- Distrustful of authorities
- Expression of fear or anxiety
- Signs of psychological trauma (including post-traumatic stress disorder)
- The person acts as if instructed by another
- Injuries apparently a result of assault or controlling measures
- Evidence of control over movement, either as an individual or as a group
- Found in or connected to a type of location likely to be used for exploitation
- Restriction of movement and confinement to the workplace or to a limited area
- Passport or documents held by someone else
- Lack of access to medical care
- Limited social contact/isolation
- Limited contact with family
- Signs of ritual abuse and witchcraft (juju)
- Substance misuse
- Person forced, intimidated or coerced into providing services
- Doesn't know home or work address
- Perception of being bonded by debt
- Money is deducted from salary for food or accommodation
- Threat of being handed over to authorities
- Threats against the individual or their family members

- Being placed in a dependency situation
- No or limited access to bathroom or hygiene facilities
- Self identifies

Indicators of forced or compulsory labour

- No or limited access to earnings or labour contract
- Excessive wage reductions, withholding wages, or financial penalties
- Dependence on employer for a number of services for example work, transport and accommodation
- Any evidence workers are required to pay for tools, food or accommodation via deductions from their pay
- Imposed place of accommodation
- Found in poor living conditions
- Evidence of excessive working days or hours
- Deceived about the nature of the job, location, or employer
- Employer or manager unable to produce documents required when employing migrant labour
- Employer or manager unable to provide record of wages paid to workers
- Poor or non-existent health and safety equipment or no health and safety notices
- Any other evidence of labour laws being breached

Indicators of domestic servitude

- Living with and working for a family in a private home or place of accommodation
- Not eating with the rest of the family or being given only leftovers, or inadequate food
- No private sleeping place or sleeping in shared space for example the living room
- No private space
- Forced to work in excess of normal working hours or being 'on-call' 24 hours per day
- Employer reports them as a missing person
- Employer accuses person of theft or other crime related to the escape
- Never leaving the house without permission from the employer

Indicators of sexual exploitation

- Advertises for sexual services offering individuals from particular ethnic or national groups
- Sleeping on work premises
- Movement of individuals between brothels or working in alternate locations
- Individuals with very limited amounts of clothing or a large proportion of their clothing is 'sexual'
- Only being able to speak sexual words in local language or language of client group
- Having tattoos or other marks indicating 'ownership' by their exploiters
- Person forced, intimidated or coerced into providing services of a sexual nature
- Person subjected to crimes such as abduction, assault or rape
- Someone other than the potential victim receives the money from clients
- Health symptoms (including sexual health issues)

Spotting the signs in children

A comprehensive list of indicators that could indicate child trafficking or modern slavery is available in the NRM child referral form. There is a wide range of signs to look out for, including:

Contact with others

- Receives unexplained phone calls whilst in placement
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good
- Is one among a number of unrelated children found at one address
- Phone calls or letters from adults outside the usual range of social contacts
- Adults loitering outside the child's usual place of residence
- Significantly older boyfriend
- Entering or leaving vehicles driven by unknown adults

Contact with authorities

- Has not been registered with or attended a GP practice
- Has not been enrolled in school
- Truancy or disengagement with education

Physical signs

- Shows signs of physical or sexual abuse
- Sexually transmitted infection or unwanted pregnancy

Behaviours

- Has a history with missing links and unexplained moves
- Has gone missing from local authority care
- Persistently missing for periods of time, staying out overnight or returning late without explanation
- Has limited freedom of movement
- Performs excessive housework chores and rarely leaves the residence

- Is excessively afraid of being deported
- The child has been seen in places known to be used for sexual exploitation
- Evidence of drug, alcohol or substance misuse
- Leaving home/care setting in clothing unusual for the individual child (inappropriate for age, borrowing clothing from older people)
- Care placement breakdown
- Pattern of street homelessness
- Low self-image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity

Money

- Has to pay off a large 'debt' (eg for travel costs) before having control over own earnings
- Is permanently deprived of much of their earnings by another person
- Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding

The NRM referral form outlines a comprehensive list of indicators for modern slavery. More information can be found on the Government's website: www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms

Annex B

Links to other information

General

GLAA – Labour Exploitation: Spot the Signs
www.gla.gov.uk/media/3178/spot-the-signs-glaa.pdf

Modern slavery training: resource page
www.gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page

Home Office: Victims of modern slavery frontline staff guidance (for guidance on identifying potential victims of modern slavery)
www.gov.uk/government/uploads/system/uploads/attachment_data/file/509326/victims-of-modern-slavery-frontline-staff-guidance-v3.pdf

Home Office: Modern slavery awareness and victims identification guidance
www.gov.uk/government/uploads/system/uploads/attachment_data/file/655504/6.3920_HO_Modern_Slavery_Awareness_Booklet_web.pdf

Government's National Strategy on modern slavery
www.gov.uk/government/uploads/system/uploads/attachment_data/file/383764/Modern_Slavery_Strategy_FINAL_DEC2015.pdf

United Nations Office on Drugs and Crime have produced a document on human trafficking indicators
www.unodc.org/pdf/HT_indicators_E_LOWRES.pdf

The Dark Figure

An ongoing photographic project by Amy Romer, which seeks to raise awareness about slavery in Britain by mapping neighbourhoods where such crimes have taken place.
www.thedarkfigure.co.uk

Safeguarding

Human Trafficking Foundation: Trafficking Survivor Care Standards
www.humantraffickingfoundation.org/sites/default/files/Trafficking%20Survivor%20Care%20Standards%202015.pdf

Criminal exploitation of children and vulnerable adults: County Lines guidance
www.gov.uk/government/uploads/system/uploads/attachment_data/file/626770/6_3505_HO_Child_exploitation_FINAL_web_2_.pdf

Safeguarding children

National referral mechanism NRM – guidance for child first responders
www.gov.uk/government/uploads/system/uploads/attachment_data/file/510091/NRM_-_guidance_for_child_first_responders_v2.0_EXT.PDF

NRM Child Referral form
www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms

Safeguarding children who may have been trafficked
www.gov.uk/government/uploads/system/uploads/attachment_data/file/177033/DFE-00084-2011.pdf

Department for Education Draft guidance on the care of unaccompanied trafficked children

https://consult.education.gov.uk/children-in-care/care-of-unaccompanied-and-trafficked-children/supporting_documents/Revised%20UASC%20Stat%20guidance_final.pdf

London Safeguarding Trafficked Children Toolkit

www.ecpat.org.uk/sites/default/files/london_safeguarding_trafficked_children_toolkit_feb_2011.pdf

Child Sexual Exploitation: definition and guide for practitioners (includes specific guidance around indicators of child sexual abuse)

www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners

Tackling child sexual exploitation: a resource pack for councils

www.local.gov.uk/tackling-child-sexual-exploitation-resource-pack-councils

There are a number of case studies on child sexual exploitation on the LGA's website:

www.local.gov.uk/sites/default/files/documents/CSE%20Case%20Studies%20Feb%202017.pdf

Safeguarding adults

The LGA's list of safeguarding resources (www.local.gov.uk/topics/social-care-health-and-integration/adult-social-care/safeguarding-resources) provides a consolidated list of key safeguarding and includes the following resources for local leaders:

- Advice and guidance to directors of adults social services <https://www.local.gov.uk/topics/social-care-health-and-integration/adult-social-care/safeguarding-advice-and-guidance-to-directors-of-adult-social-services>
- Councillors' briefing: safeguarding adults www.local.gov.uk/topics/social-care-health-and-integration/adult-social-care/councillors-briefing-safeguarding-adults

- Must know on safeguarding for lead members www.local.gov.uk/sites/default/files/documents/must-know-lead-members-an-c38.pdf

- Adult Safeguarding Community of Practice <https://khub.net/web/adultsafeguardingcommunityofpractice>

Making safeguarding personal (MSP): provides access to all the reports, tools and resources resulting from the MSP approach: www.local.gov.uk/topics/social-care-health-and-integration/adult-social-care/making-safeguarding-personal

Mental Capacity Act including Deprivation of Liberty Safeguards: a list of key resources for councils and their partners on implementing the Mental Capacity Act including the Deprivation of Liberty Safeguards

www.local.gov.uk/topics/social-care-health-and-integration/adult-social-care/mental-capacity-act-including-dols

The safeguarding adult board locally can be an important source of advice and assistance for example in helping local organisations improve their safeguarding awareness and mechanisms and in sharing practice.

Procurement

Protecting Human Rights in the Supply Chain: a guide for public procurement practitioners, ©London Universities Purchasing Consortium, University of Greenwich, Chartered Institute of Procurement and Supply 2017

<https://static.uk-plc.net/library/london-universities-purchasing-consortium/documents/knowledge-lupc---protecting-human-rights-in-the-supply-chain.pdf>

Transparency in Supply Chains, etc:
A practical guide

www.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf

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Subcontractors of the Adult Victims of Modern Slavery Victim Care Service
for The Salvation Army



Local Government Association

18 Smith Square
London SW1P 3HZ

Telephone 020 7664 3000

Fax 020 7664 3030

Email info@local.gov.uk

www.local.gov.uk

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