

**POLICE AND CRIME  
COMMISSIONER FOR  
LEICESTERSHIRE**

**ETHICS, INTEGRITY AND  
COMPLAINTS COMMITTEE**



Report of	<b>OFFICE OF CHIEF CONSTABLE</b>
Subject	<b>MODERN SLAVERY</b>
Date	<b>FRIDAY 18 SEPTEMBER 2020 – 200PM</b>
Author	<b>DCI GAVIN DRUMMOND</b>

**Purpose of Report**

1. To provide the Ethics, Integrity and Complaints committee with an overview of Modern Slavery and an insight into the Force's approach. The report will provide an outline of what processes are currently in place, how these have developed over the past few months and the force's plans for the future.

**Recommendations**

2. The Committee is recommended to discuss the contents of the report.

**Ethical Dilemmas**

3. Modern Slavery is present in every single area of the UK and due to its complexities, the signs can often be difficult to spot for both the authorities and also the wider public. The number of people identified as victims of modern slavery has been rising year on year, with over 10,000 people being referred to the authorities in 2019.

Modern slavery in the UK can take many forms including sexual exploitation and domestic slavery. The most common form of slavery in the UK is Labour exploitation, fuelled by a drive for cheap products and services with little regard for the people behind them.

Many victims of Labour exploitation chose to remain in their situation of victimisation despite being identifiable as vulnerable by authorities and with the offer of relevant support.

**When a potential victim of labour exploitation does not readily identify as such, refuses to engage with authorities and chooses to remain despite the given concerns, what onus should there be on the state to intervene and safeguard when the victim has the capacity to make their own informed decisions?**

### **Background**

4. Tackling Modern Slavery and human Trafficking (MSHT) is a key priority for Leicestershire Police in conjunction with partners across Leicester, Leicestershire and Rutland. It is the responsibility of all agencies across the partnership to identify, safeguard and robustly tackle MSHT.
5. In 2015, the government passed the Modern Slavery Act, the first piece of legislation focusing on the prevention and prosecution of modern slavery and the protection of victims, since the introduction there has been ever growing awareness.
6. Whilst labour Exploitation is a sub set of modern slavery and human trafficking, it covers an extremely wide range of offending from victims exploited in car washes, the agricultural sector, construction industry and the garment sector which has recently been raised at local and National level as a concern within LLR.
7. The three labour exploitation types are as follows:
  - Victims exploited for multiple purposes in isolated environments – Victims who are often highly vulnerable are exploited for labour in multiple ways in isolated rural locations. Victims live on offenders property in squalid conditions, are subject to repeated abuse and are very rarely paid.
  - Victims work for offenders – Victims are forced to work directly for offenders in businesses' or sites that they own or control. The main method of exploitation is not paying or illegally underpaying victims. This has been seen as being particularly prevalent during recent Garment Sector investigations.
  - Victims work for someone other than the offenders – Victims are employed in a legitimate and often low skilled job, with legal working conditions. Most or all wages are taken by offenders often through control of the victim's bank account.
8. Offenders and victims will often be known to multiple government agencies, with many holding intelligence and evidence that can be invaluable to an investigation. In addition, such agencies often have specific regulatory powers that investigations can utilise, the Police are not always the right agency to lead on such investigations.

### **Why does the victim remain?**

9. At the heart of any modern slavery case will be victims who are being or have been exploited. They will often present unique vulnerabilities that can relate to

age, background, culture and personal circumstances. Factors that can make a person vulnerable to modern slavery is:

- Homelessness
  - Immigration status
  - Alcohol/drug abuse
  - Debt bandage and/or family involvement
  - Poor education
  - Mental health or learning difficulties
  - Financial difficulties
10. Coercion is heightened with circumstances of need and ones will to survive. The offer of a reward paired with the individual's level of vulnerability and also their level of susceptibility can lead to coercion. In cases of labour exploitation, the promise of drugs, alcohol, monies and accommodation may be used by the exploiter to recruit the individual.
11. In nearly all cases victims of labour exploitation will not be subject to physical restraint preventing them leaving the person who is exploiting them. Offenders can often relax their level of control over the victim because the victim can become dependent on them with all possible outside economic and social support being essentially removed or cut off.
12. Victims can stay within an exploitative situation for a number of reasons; they are scared to leave, feel they have nothing better to return to, believe that they are living a better life and do not see themselves as victims. Victims may have no money, are unsure where to go, or are fearful of authorities.

### **Force and Partnership Approach**

13. The Force has the following MSHT leads in place:

Chief Officer Lead	ACC David Sandall
Strategic Lead	DCI Gavin Drummond
Dedicated Investigative Lead	DI Jen Heggs

14. Leicestershire Police have in place a dedicated modern slavery and human trafficking investigation team based within the multi-agency safeguarding hub at Wigston Police Station.

15. The MSHT team was established in 2014 in anticipation of the launch of the Modern Day Slavery Act in 2015. Over the following years, MSHT demand increased significantly and since May 2019 the established posts within the team consists of:

- 1 X DS
- 6 x DC's
- 2 x ISA's
- 1 s Safeguarding PCSO

16. The team investigate all reported incidents and intelligence linked to MSHT which provides the Force with a centre of excellence for such a complex area of business.
17. There are a number of multi-agency meetings that take place in LLR designed to tackle MSHT.
18. LLR Modern Slavery Action Group – The LLRMSAG was set up in June 2018, bringing together a range of different agencies across LLR. The aims of the group are as such:
  - Educating professionals and members of the public
  - Safeguarding victims of MSHT
  - Disrupting MSHT related crime.
19. Non-Compliance in the Garment and Textile Sector Strategy Group – In November 2019, directed by the Leicester City Mayor, the group was established, chaired by Leicester City Council. To ensure that this work is delivered proactively, the head of community safety and protection has appointed a labour exploitation co-ordinator. Partners involved within the group consist of:
  - Local Authority
  - Police
  - HMRC
  - Gangmasters and Labour Abuse Authority(GLAA)
  - Employment Agency Standards Inspectorate
  - The Health and Safety Executive
  - The Department of Work and Pensions
  - Trading Standards
  - Immigration Enforcement
  - Citizens Advice Bureau

The aim of the group is to promote and encourage compliance across the Garment Sector operating within Leicester City by addressing the strategic issues caused by labour exploitation.

The importance of this work has been raised at a National level and engagement and enforcement of the partnership work is currently further supported through a strategic task force led by the GLAA. There is national Home Office scrutiny and support of this taskforce, of which both Leicestershire Police and City Council are supportive partners. GLAA lead the taskforce but Leicester City Council lead the community engagement.

20. Tackling Labour exploitation, especially with the Garment sector is complex and multi-faceted. Although the word “exploitation” is used regularly to describe such issues, it is not criminal exploitation in the way it is legislated for within the Modern Slavery Act 2015. Often the exploitation is associated with rates of pay and poor working conditions, both of which are investigated by other enforcement agencies. There are a number of other difficulties associated to Labour Exploitation:
  - Lack of intelligence relating to the Garment Sector.
  - Identification of those individuals responsible for the Factories – Many businesses are based in large Victorian factory premises

- which are subdivided into numerous small businesses and often sublet many times.
- Worker Collusion – Information and intelligence indicates that there can be at times a degree of worker collusion with regards to the claiming of tax credits and benefit fraud. By being paid as little as they are, workers are able to claim working tax credit, meaning their collective income is more than they would have been paid through minimum wage. This makes it extremely challenging for authorities to identify a true victim of modern slavery where exploitation is very much key in their behaviour.
  - Often Police and Partners do not have powers of entry if entry to premises is refused or if there is no prior intelligence relating to criminal activity.

### **Victim Support – The National Referral Mechanism (NRM)**

21. The NRM is a framework for identifying victims of modern slavery or human trafficking and ensuring they receive the appropriate support. As part of this, care and support is provided by the Salvation Army.
22. The NRM does not investigate modern slavery but seeks to support the victim.
23. Only designated first responders can refer victims to the NRM.
24. The NRM provides the victim with:
  - Safe accommodation and material assistance
  - Medical treatment and care
  - Counselling and emotional support
  - Advice on immigration and legal rights and services
  - Advice on the criminal justice system
  - Guidance on education, training and employment
  - A period of reflection and recovery when a person cannot be removed from the UK. The recovery period is intended to give the victim time to recover and escape the influence of the exploiters so that they can make an informed decision about cooperating with the authorities.
  - Assistance with returning home safely.
25. The NRM is a voluntary scheme and so the victim must consent to a referral. This is something that provides a challenge especially where a person does not identify themselves as a victim.
26. Where a victim(s) refuses to engage with authorities, the onus is placed upon such authorities to investigate and disrupt the exploitation where possible. The role of partnership working is key to this as it is often the case they have legislation to tackle the exploitation in a different way rather than having a victim centric investigation.
27. The Government Agency Intelligence Network (GAIN) is network of 22 core government agencies including all Police Forces and the NCA. By adopting a multi-agency system approach, a referral to GAIN can lead to partnership intelligence sharing and disruption activity. There is a GAIN single point of contact located within each Regional Organised Crime Unit who can offer advice and share nay requests to multiple agencies and organisations.

## **Implications**

Financial: The Force has committed resources to tackling MSHT, this has a financial implication that is exasperated through often long and complex investigations.

Legal: Modern Slavery Act 2015

Equality Impact Assessment: Equality is a thread through the Modern Slavery Act.

Risks and Impact: Failure to successfully identify and safeguard a victim of modern slavery can lead to significant physical and psychological issues to them. Equally failure to deal with the exploiters effectively can lead to the exploitation of many vulnerable persons.

Link to Police and Crime Plan: MSHT features within Police and Crime Plan.

## **List of Appendices**

- NPCC – Modern Slavery Annual report 2019

## **Person to Contact:**

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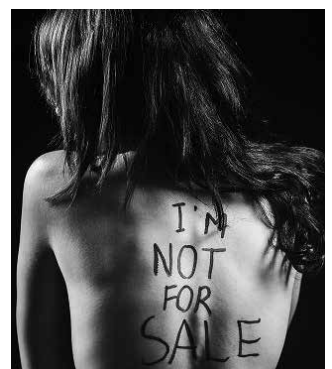
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# MODERN SLAVERY

Police Transformation



# The Modern Slavery Act (2015) and the policing response

The Modern Slavery Act (2015) covers a wide range of abuse, including the coercion, control and trafficking of others for the purposes of sexual exploitation, labour exploitation, criminal exploitation, domestic servitude, financial exploitation or organ harvesting.

It is important that the initial and subsequent actions taken by police in responding to these cases are fully effective in terms of;

- the safeguarding and protection of victims;
- the recording and reporting of potential crimes under the Modern Slavery Act, and;
- fulfilling our responsibility to identify and investigate the form of exploitation that victims may have been subjected to.

The Act consolidates several pieces of prior legislation into the two main offences of; 1) Slavery, Servitude and Forced or Compulsory Labour and; 2) Human Trafficking. The seriousness of these offences was recognised by an increase in the maximum sentence to life imprisonment.

**Deciding whether there are grounds to suspect a person may be a victim of exploitation under the Modern Slavery Act:** In making this decision it is important to consider all the information available and not rely solely on the account of a potential victim. It is important to consider the nature and type of services that a victim is expected to provide; whether this is the provision of labour, sexual services, or being expected to commit other crimes. If a person is believed to be providing services as a result of threat, menace, control, coercion or as a result of having been deceived, then that person may be a victim of slavery and human trafficking. It is irrelevant whether the victim consents to providing those services or whether they say they are providing those services voluntarily.

**Section 1 - Slavery, Servitude and Forced or Compulsory Labour** - this is defined as 'where a person holds another person in conditions of slavery or servitude or requires another person to perform forced or compulsory labour and that person knows, or ought to know, that the other person is being held as such'. This includes any work or service which is extracted from a victim under threat or menace or deception.

**Section 2 - Human Trafficking** - this is defined as 'where a person arranges or facilitates the travel of another person with a view to that person being exploited'. The Act now provides a single offence of Human Trafficking, covering sexual and non-sexual exploitation. This involves the recruitment, transportation, transfer, harbouring or receipt of victims for the purposes of exploitation; either within or without the victim's consent, either inside or outside the UK.

**Section 3 – Meaning of Exploitation** – the Act defines exploitation as; Slavery, servitude and forced or compulsory labour; Sexual exploitation; Removal of organs; Securing services by force, threats or deception; Securing services from children and vulnerable persons.

**Criminal exploitation and the Section 45 Defence**  
Section 45 of the Act provides a statutory defence to victims who have committed a crime themselves. It does not extend to more serious offences such as rape or murder. Offences to which the Section 45 defence can be applied include drug dealing, cannabis cultivation, shop lifting, benefit fraud, pick-pocketing and begging. If a person raises the Section 45 defence officers must take steps to investigate.



**Victoria Atkins**  
Crime, Safeguarding and Vulnerability Minister

Victoria Atkins MP was appointed as Parliamentary Under Secretary of State at the Home Office in November 2017 and Minister of State for Women in January 2018. She was elected Conservative MP for Louth and Horncastle in 2015 and re-elected in 2017.

Victoria read law at Cambridge University before becoming a criminal barrister and being appointed to the Attorney General's Regulators Panel and the Serious Fraud Office's list of specialist fraud prosecutors. Victoria has a wide ranging Ministerial portfolio including responsibility for child abuse and child sexual exploitation, violence against women and girls, domestic violence, modern slavery, missing people, anti-social behaviour, drugs, alcohol, gangs, youth crime and serious violence, knife crime and in her role as Minister for Women, gender equality, women in business, women's representation and the gender pay gap.

“ There has been a real sea change in the police response to modern slavery over the last two years with greater awareness and many more operations across the country. There is real sense now that modern slavery and exploitation is a priority for policing and that there's a willingness to lift the stone and commit to tackling this crime. The Modern Slavery Police Transformation Programme has been a cornerstone of this change.

The Programme has already helped to deliver improvements not just in policing and law enforcement, but across the system more broadly. This is testament to the way activities within the Programme were designed to support interventions that would make the biggest difference. This includes the significant impact that has been made at a regional and local level through the work of the Programme's regional teams

**Victoria Atkins, Crime, Safeguarding and Vulnerability Minister**



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For more information about the Modern Slavery Police Transformation Programme contact the Programme team at: [ModernSlavery@devonandcornwall.pnn.police.uk](mailto:ModernSlavery@devonandcornwall.pnn.police.uk)  
 Visit our website: [www.policingslavery.co.uk](http://www.policingslavery.co.uk) or follow us on Twitter: [@policingslavery](https://twitter.com/policingslavery)  
 Police and law enforcement professionals can access professional guidance on the investigation of modern slavery cases by visiting the: POLKA Modern Slavery Community



## Shaun Sawyer QPM, Chief Constable of Devon & Cornwall Police and NPCC lead on modern slavery

**I am honoured to lead the Modern Slavery and Organised Immigration Crime portfolio on behalf of the National Police Chiefs' Council and over the last year have also had the privilege of chairing, on behalf of the National Crime Agency, the National Threat Group on Modern Slavery. I have also had the privilege of leading our activities flowing from the Modern Slavery Police Transformation Programme.**

Whilst this report focuses on the work of the Programme over the past year, it also reflects the increasing commitment of a range of partners within law enforcement, wider public service and business. The commitment of our partners within the third sector has been exceptional, and without it we could not deliver our services to victims.

It is with growing urgency that we all seek to ensure that people are released from conditions of exploitation at the first possible opportunity, that offenders are brought to justice, and that the UK becomes a place in which it is difficult to get away with harming others in this way. I am increasingly concerned by the levels of child exploitation we are uncovering within England and Wales.

Since 2017 we have seen a transformation in activity to tackle modern slavery, and a move towards prevention as well as focusing on detection. There are now many more victims being supported, many more investigations underway and a significant increase in local partnership working taking place to prevent offences within communities. This uplift is in part due to a greater focus on slavery within law enforcement, but also as a result of growing public awareness. The greater willingness of the public to report concerns about exploitation is welcome, whether directly to police or via channels such as the Modern Slavery Helpline (08000 121 700).

Converting the steep increase in police operations into prosecutions is not without challenge. Wider issues, including acknowledged shortages in specialist resources such as detectives, analysts and financial investigators, and disclosure of high volumes of digital evidence, all have a significant impact on these complex cases.

Slavery and human trafficking cases bring additional complexity to investigations, for example, supporting highly vulnerable victims and gathering evidence across jurisdictions. International cooperation is key, alongside enduring victim support. This year, we have actively supported the Home Office in their development of the National Referral Mechanism and their commitment to supporting victims.

Ever-closer collaboration between police and specialists from across the charitable and public sector, including local and national government departments, is taking place to further their efforts to achieve this. The role of police and crime commissioners is integral to building local capabilities and supporting the national endeavour. Their work and support, this year and for the coming years, is crucial.

Our goal as a society must be to confront modern slavery exploitation everywhere we see it. Education is not solely for the classroom or the boardroom but for all of us, and ultimately, a step change is needed in our everyday behaviours, and in the choices we make, to reduce the marketplace for exploitation.

Modern slavery exploitation and human trafficking not only affects individual lives, but is clearly also undermining legitimate businesses and economies. Increasingly, I see links between modern slavery and its environmental impacts: for example, trade in illicit goods and the ravage of our natural environment, driven by the demand for cheap food, are exacerbated by slavery.

The last two years have seen unparalleled advances in our law enforcement response but there is much more to do. This is an endeavour that lies way beyond a law enforcement response but due credit must go to parliamentarians and Government for placing this agenda at the forefront of this country as an issue to be confronted in our lifetime.



Devon & Cornwall Police

# Executive Summary

**Since the decision to invest in improving the police response to modern slavery was announced 29 months ago, rapid progress has been made. The Modern Slavery Police Transformation Programme is recognised as playing an important role in delivering the UK's ambition to end modern slavery. Additional investment from national police funds has just been confirmed, enabling the Programme to be extended until 31 March 2020.**

This report describes the way in which the Programme is supporting police forces, regional organised crime units and national law enforcement agencies to improve their response to modern slavery. Primarily this involves identifying and promoting good practice, providing resources to underpin collaboration and moving information more effectively around the police system.

The report outlines how the Programme is raising awareness amongst police and partners and how it ensures that there is guidance and support in place to make it more likely that the initial actions taken are effective in safeguarding victims and securing evidence.

The Programme has supported police forces to deliver a greater than sevenfold increase in investigations against slavery, with the number of investigations rising steeply from 188 in November 2016 to 1370 at the end of April 2019. This is a huge uplift in activity against a challenging resourcing landscape.

Over the past year the Programme has reviewed, debriefed, and audited the case files of hundreds of investigations to identify what went well and gather learning points. The Programme translates this into guidance and practical advice, accessible online or through our network of expert advisers, enabling every investigation to improve.

The Programme also uses this information to help influence the design of future policing capabilities; such as the way in which police intelligence systems record modern slavery. Evidence has also been provided to inform wider reviews of legislation and to the Home Office reform programme for the National Referral Mechanism (NRM).

The Programme has developed accredited training courses to support those delivering specialist roles within policing, delivering these to hundreds across the country. The Programme team has ensured that modern slavery is reflected across the police curriculum, from young people within the Volunteer Police Cadets to executive leaders.

The vast majority of modern slavery offences, through the recruitment, coercion, trafficking and exploitation of victims,

take place in our communities. Any single case will often involve events in multiple towns, cities or rural locations. The response of local policing to these crimes is therefore a cornerstone of our national effort to end slavery.

The Programme has supported the 43 forces in England and Wales to improve their local capability by providing a framework for improvement against which forces and police and crime commissioners can consider their local response. Regional transformation teams act as critical friends, signposting good practice as part of this process.

Where challenges are repeatedly identified, the Programme's specialists have developed national solutions, a prime example being the progress made this year to improve crime data recording and referral processes for the NRM and Duty to Notify.

At an international level, the Programme has provided additional resources to the NCA's team within Europol thereby maximising the exchange of intelligence and has supported investigators in navigating the complexity of undertaking international enquiries. The Programme has also collaborated with law enforcement and NGO partners in the UK and in other countries (particularly victims' countries of origin and states through which they are trafficked) to identify ways to better safeguard and support victims and witnesses who have left the UK.

The Programme has helped to test and to improve the understanding of the threat in order to assist the whole of government in its wider effort to be even more effective in combatting modern slavery.

The innovative Joint Slavery Trafficking and Analysis Centre has proved successful in strengthening the national intelligence picture and has now been adopted by the National Crime Agency, with funding secured for a further three years. Alongside this, the Programme's national and regional insight and analysis teams have developed powerful data that helps to identify the changing nature of modern slavery.

The capability to combine information about modern slavery from all 43 police forces, alongside other law enforcement and wider partners is helping to shape more effective prevention interventions. The impact of this cannot be overstated: for example, it affords the opportunity to develop better ways to identify and protect children and young people who go missing and are at risk of exploitation.

The Programme's regional transformation teams, alongside the network of police and crime commissioners, are helping

to harness the energy of an ever-growing group of partners. The information, resources and coordination the Programme team provides are supporting many partnership endeavours in moving beyond shared intent to targeted action.

Just a handful of the nearly 100 initiatives that the Programme has enabled police and crime commissioners to deliver this year are described in this report. They illustrate the important roles PCCs have in increasing awareness and brokering collaboration in order to make local communities safer.

Police investigations that commence in 2019 should be more effective as a result of increased awareness, more accessible guidance and good practice, improved intelligence systems and through the efforts of the cohorts of trained investigators and other specialists. These cases take time to develop and often in excess of two years to come to court. The impact on prosecution rates will not be immediate, but we are confident that these initiatives will contribute to a continuing increase in offenders being brought to justice.

Over the coming year, the Programme will be working to ensure that pathways for improvement within policing remain beyond March 2020 and to focus increasingly on informing prevention activity, where the most lasting impact can be made.

At the same time we will continue to act now to support forces to improve the efficiency of the police response. We will facilitate further collaboration within the police service, and between police and partners, locally, nationally, and globally, in support of our shared goal.

Indeed, we would like to recognise the contribution to the progress being made on modern slavery by the wide range of partners that we have collaborated with over the last year from within law enforcement, from across government and from the charity sector.

Most especially though, we want to express our sincere thanks to all members of the Programme team – within JSTAC, within the Modern Slavery Police Transformation Unit, and within the National Anti-Trafficking and Modern Slavery Network. Their professionalism and commitment to the cause has been steadfast, even when the prospects for the future were unclear. We look forward to continuing to work together to make further important progress in transforming the policing response to modern slavery.

**Clare Gollop, Programme Director  
NPCC Portfolio Modern Slavery & OIC**

**Detective Superintendent Andrew Munday, Commander,  
Modern Slavery Police Transformation Unit**

## Key figures

### Police referrals into NRM:

- 2017: 1384
- 2018: 2084

### Police force live operations:

- Nov 2016: 188
- April 2019: 1370
- 629% increase over life of Programme

### Guidance materials:

- 25 guidance products published
- 150+ intelligence briefs and assessments
- Initial actions advice for frontline policing

### Comprehensive training:

- Awareness roadshows reached 900 frontline leaders
- 750 specialist investigators trained
- 575 specialist interviewers received CPD
- 490 senior investigators received CPD
- 850 analysts received CPD
- 110 OPCC staff attended workshop events

### Wider partnership building:

- Engagement with charities, NGOs and antislavery partnerships locally
- First national partnership conferences supported with more than 350 attendees
- Close to 100 local partnership initiatives funded with support of PCCs

# The Modern Slavery Police Transformation Programme

## Background

The National Policing Lead began seeking investment to support the police service to respond more effectively to modern slavery in 2015. At that time the nature and extent of slavery was not well understood or evidenced by any agencies or departments.

Through reviewing the police response in each of the forces in England & Wales, the NPCC portfolio team provided evidence to inform the Independent Review of the Modern Slavery Act 2015 by Caroline Haughey QC.

In July 2016, the Haughey Review provided an independent assessment of the potential gaps in the way that the criminal justice system in the UK responded to cases of modern slavery. This reinforced a sense that the police service needed a concentrated programme to drive both cultural and process change.

Law enforcement agencies were beginning to work more closely together through the Modern Slavery National Threat Group. However, a major challenge lay with each of the law enforcement agencies involved using only their own data to interpret the threat of modern slavery and reaching very different conclusions as a result.

A shared understanding of the problem and was essential in order to target activity across the whole system effectively but resources to enable collaboration were limited. The waiting list for joint assessments quickly reached multiple years.

## A game-changing opportunity

In November 2016, the Home Secretary Rt Hon Amber Rudd MP approved the investment of £8.5M of police reform and transformation funding for the Modern Slavery Police Transformation Programme. This followed the multi-agency National Threat Group having evidenced the interdependencies across the whole of system in combatting modern slavery. It was clear that the impact of improving the police force's response would be amplified if the programme could simultaneously support other agencies in their efforts to improve.

“**The modern slavery initiative has worked to drive up policing activity. With specific training now in place we can see more effective intelligence development and improving investigative case work as a result. In turn this is leading to a noted increase in requests for early investigative advice and potential prosecutions**

**Pam Bowen, Senior Policy Advisor, Crown Prosecution Service**

## The Programme aimed to:

- Establish the multi-agency Joint Slavery and Trafficking Analysis Centre, and deliver all-source strategic intelligence products to inform UK policy.
- Improve the way in which the police and partners collect, use and share intelligence in order to better understand modern slavery and to identify vulnerable people, locations, and offenders.
- Support forces to engage in international enquiries, including increasing engagement and intelligence sharing with Europol.
- Improve our understanding of “what works” in tackling modern slavery, improving the way we understand the impact of policing, and supporting investigations to become even more effective.
- Develop and deliver training and awareness-raising activity, specific to a range of roles across the police family.
- Improve the way that the National Referral Mechanism competent authorities exchange information with police and influence the design of the new Single Competent Authority.
- Support police and crime commissioners to play an active role in tackling modern slavery within their communities.

## Funding was initially granted for 29 months and can be divided into three phases

- **November 2016 – March 2017:** The framework for delivery was put in place during which time over 70 new roles were established and recruited into 20 separate organisations.
- **April 2017 – March 2018:** Operational delivery phase, reported in Annual Report to March 31 2018.
- **April 2018 – March 2019:** Operational delivery phase, covered within this report.

In April 2019, with the support of the PCC for Devon, Cornwall & the Isles of Scilly, Alison Hernandez, the Programme's resources were retained.

In May 2019 the Home Secretary, Rt Hon Sajid Javid MP confirmed investment to enable the Programme to operate until March 2020.

## Key Achievements 2017-19

- Significant progress towards a shared understanding of the threat, measured by a reduction in key national intelligence gaps. Agencies and wider government are better informed about how offenders operate and are more able to intervene accordingly.
- The timely provision of evidenced-based briefings to policy makers, providing a foundation for decisions about the UK's strategic response to modern slavery.
- The adoption of the Joint Slavery and Trafficking Analysis Centre by the National Crime Agency, securing dedicated multi-agency resources until March 2022.
- The regular provision of information about police operations and disruption activity, enabling improved understanding of police and partners' response to modern slavery.
- The publication of 25 investigative and wider guidance products to promote good practice and act as a point of reference for live investigations and intelligence development activity.
- The identification of opportunities to improve police intelligence systems and processes in order to better protect victims and pursue offenders.
- Increases in the volume and quality of intelligence exchanges between police forces in the UK and in other countries, and a greater number of international joint investigations involving police forces in England and Wales than ever before.
- The publication of more than 70 intelligence briefs of which 16 were full JSTAC assessments, together with more than a dozen strategic analytical reports from the Insight Team informing policy development, law enforcement and partnership activity.
- Increased support for a strengthened national network of strategic and operational leads within police forces in order to help embed good practice.
- The review of more than 330 investigation case files and the debriefing of 75 investigations. Almost all police forces in England and Wales participated in this activity to identify thematic issues and good practice, and to prompt local improvement actions.
- Increased collaboration to improve investigation, prevention and enforcement activity at international, national, regional and local levels, measured by the activity of multi-agency forums.
- The development and dissemination of College of Policing accredited training and other bespoke CPD materials, in order to raise awareness and to support a range of policing functions.
- The delivery of College of Policing accredited training and additional CPD activities to more than 4,000 officers and police staff at 140 training events held across the country.
- Changes to the way in which police forces record and review modern slavery crimes and interact with the Home Office National Referral Mechanism / Duty to Notify processes in order to ensure offences are appropriately investigated and victims supported.
- Increased engagement by police and crime commissioners, measured by the range of activity undertaken locally and nationally in relation to modern slavery.
- The publication of a toolkit to support police and crime commissioners and their teams in the delivery of more effective local responses to modern slavery, promoted through nine regional events.
- The delivery of almost 100 local partnership and business engagement projects in 34 forces.

## During 2019/20 the Programme aims to support the police service to:

- Increase the focus on prevention activity.
- Increase the focus on targeted intelligence development and intervention.
- Continue to focus on improving investigations and on overcoming barriers to prosecution.
- Increase the focus on protecting children, reducing gaps between differing strategic responses to the forms of modern slavery that cause harm to children and young people.
- Identify ways to ensure that the response to modern slavery continues to improve beyond March 2020.



**Mark Burns-Williamson OBE**, Police and Crime Commissioner of West Yorkshire, Chair of the Association of Police and Crime Commissioners and national PCC lead on modern slavery and human trafficking

**As a police and crime commissioner, I can see at first hand what impact the focus of this Programme is making on policing. There is no doubt in my mind that a significant contribution has already been made in helping police forces respond to the priority that the government has placed on tackling this form of exploitation.**

At a practical level the regional coordination and support available, the training and the awareness raising activity and the investigative guidance now provided are all attracting the attention of PCCs and police forces. It means the building blocks are in place to help embed greater consistency in the policing response. The huge increase in investigations and operational activity reported by the Programme is testament to this greater level of focus.

But we have to accept that there are limits on what a central programme can achieve on its own. Local ownership is vital and we have to reflect that PCCs and police forces across the country are all dealing with competing local priorities. I think the Programme has done as much as it could have in the time available when set against those competing local priorities and the backdrop of policing resources being as squeezed as they are. It is still our aim to ensure that all forces are able to deliver a high-quality and consistent response to modern slavery, however, given the complexity of the offending and the scarcity of the specialist skills needed to investigate these cases, it is inevitable that this could still take a few more years to fully achieve.

The Programme shows us that sophisticated investigative and case management skills are vital to positive victim and prosecution outcomes in modern slavery. Trained officers need to be available locally to respond. That's why through the National Anti-Trafficking and Modern Slavery Network

(NATMSN), I have encouraged PCCs to specifically identify modern slavery within their police and crime plans as a way to ensure that these skills are developed and properly targeted.

Multi-agency partnerships have also been shown to be of great value. The Programme team has helped with this at a strategic level in supporting closer collaboration between law enforcement agencies and government departments. Operationally this has translated into stronger partnership working at a local level between police forces and the likes of the NCA, GLAA, HMRC, Border Force, IE and DWP. The benefits are of critical importance in supporting investigations and days of action.

Partnership approaches are also needed to support victims who, for a variety of reasons, may not be able to engage with the police. This can be as a result of the trauma they have suffered, suspicion of the authorities or fear of retribution. This is where specialist victim support arrangements, often provided through NGOs and third-sector agencies, have been shown to help. Victims benefit from help with rebuilding their confidence and sense of security, while police benefit from having continuing access to the victim throughout any investigation.

Getting the victim support package right is important and is not something we can always expect police forces to respond to without outside help, especially as all cases and situations are different. This is a further crucial requirement that the Programme has championed and that, as PCCs, we must continue to support.

**Alison Hernandez**, Police and Crime Commissioner for Devon, Cornwall and the Isles Scilly and Chair of the Modern Slavery Police Transformation Programme Strategic Oversight Board



**I want to say how impressed I am with the dedication shown by every member of the national policing and partner team contributing to this project. I am struck by how committed everyone is to making a positive difference to improving the way we support victims, deliver investigations and develop longer-term prevention activity. Reducing the ability of perpetrators to wilfully exploit vulnerable people is a shared mission.**

I am proud of the detailed and technical work undertaken to inform national decision making and of the continuing effort to engage chief constables and PCCs in taking action on modern slavery and exploitation at a local level.

The comprehensive data gathering and analysis that has helped us all to build a better understanding of the size and scale of this offending comes to mind as a particular success. This work has been led through the creation of the Joint Slavery Trafficking and Analysis Centre (JSTAC) and is supported by the modern slavery operations Insight Team based in Exmouth in Devon. Through their collective efforts we now have a much clearer idea of where modern slavery offences are taking place, how it is happening, who is involved and what the drivers of these forms of exploitation are. An early surprise for me was the higher than expected involvement of British nationals in modern slavery, both as victims and perpetrators. This evidence-based analytical insight continues to make a critical contribution to the formulation of national policy in this area.

Working with the National Anti-Trafficking and Slavery Network, the Programme team has also supported PCCs in creating a local focus in the fight against exploitation. PCCs have a real opportunity here to lead in tackling crime related to modern slavery and in the prevention of it. To support this we have produced and shared a PCC toolkit which features much of the good work being done on this, particularly in the commissioning of victim services and in providing scrutiny of the overall response delivered by police forces and local partners.

With so much foundation work now done, we are at a bridgehead where policing can focus on embedding the tools, techniques and good practice recommended. The majority of police forces have participated in creating this best practice, so it is very much owned by policing. Meanwhile there are broader challenges to overcome where police forces are simply part of a bigger system.

The first of these to highlight is victim care. This where PCCs and local partners must ensure that the right forms of victim support are in place locally over and above that provided by the NRM. Effective victim care services allow police officers and staff to get on with their core role of tracking down perpetrators, building cases and supporting successful prosecutions. As mentioned above, some PCCs are already active on this issue.

The second challenge lies in working with groups vulnerable to exploitation to help them to appreciate how they could become victims. We need to help people understand what this might look and feel like. We also need to be able to offer support when those who are already very vulnerable feel a need to report concerns.

The third challenge is to look at what we can all do to educate the public about making better choices in the products they buy and the services they use. An example in the South West is our work with Trading Standards to ensure that products and services accredited within their "Buy With Confidence" scheme are free from modern slavery and exploitation. Making consumers aware of these opportunities to reject exploitation can make a big impact. Turning off demand for products and services that can only be provided as a result of someone else having been exploited is a key goal.

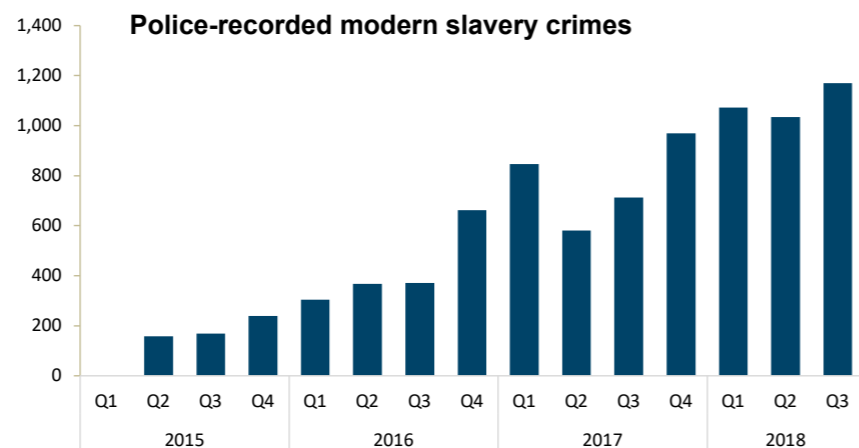
There is no single answer to eradicating modern slavery and it certainly can't be achieved through law enforcement alone. Through the work of this Programme, police are now better placed to play an important role. The bigger solution lies in encouraging every member of society to play their part too.



# Modern slavery investigations and recorded crimes are increasing – and so is our understanding of them

The number of modern slavery crimes recorded by police in England and Wales has increased rapidly. In the last year recorded crime levels have overtaken the numbers that might be anticipated based on applicable NRM referrals, indicating an increasingly proactive law enforcement response.

30% of the 6993 potential victims referred into the National Referral mechanism during 2018 were identified and referred by police forces. Forces referred 2084 potential victims in 2018 compared to 1384 in 2017.



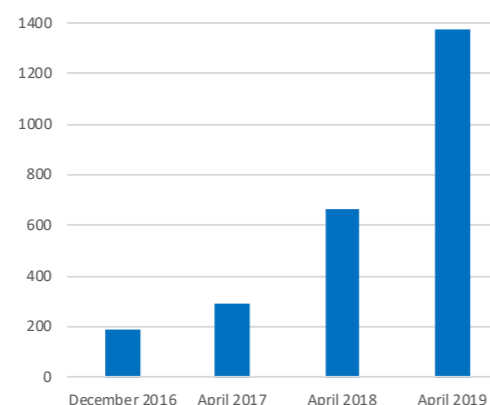
A combination of factors inflated reporting levels in Q4 2016 and Q1 2017, including changes within NRM referral processes, changes to crime rules, and intensification activity.

Such a large increase in these complex investigations presents challenges throughout the criminal justice system. The programme is supporting system-wide Deep Dives to improve the information about modern slavery outcomes and learn more about how to prepare cases effectively for court.

## Understanding police activity

A national dataset developed by the programme is helping to reveal new information about the types of modern slavery that police forces across the UK are investigating. The number of live investigations fluctuates month to month, with investigations sometimes opening and closing very rapidly, and others that are ongoing for multiple years.

Since December 2016 more than 3450 modern slavery investigations have been entered into the dataset and analysed. The increased contextual understanding resulting from this is informing intelligence-led activity, shaping prevention initiatives and helping to diagnose challenges across criminal justice system.

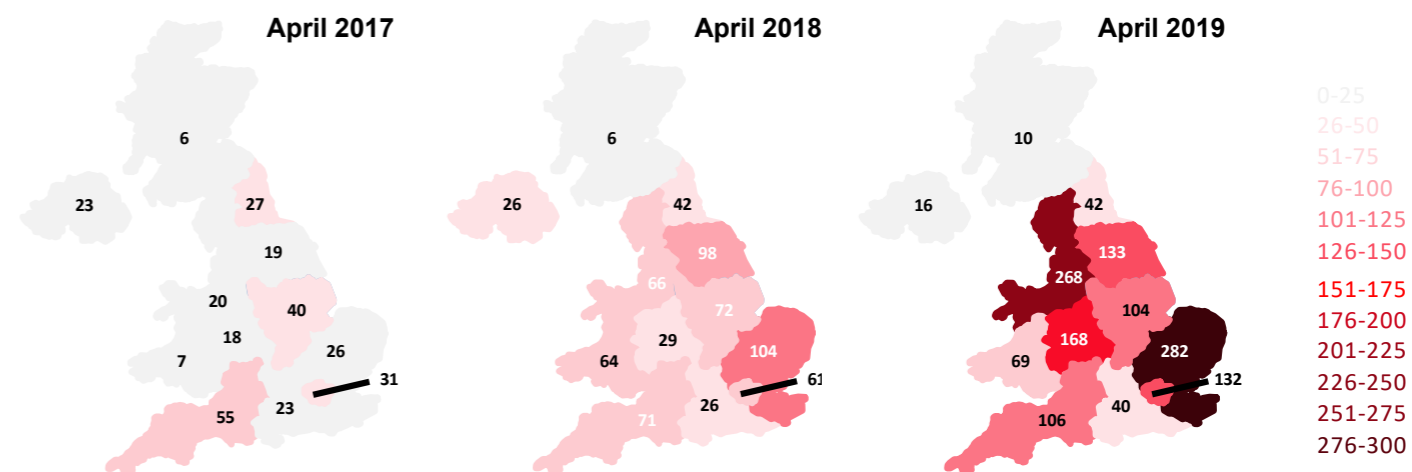


**Number of Live Operations**  
There were at least 188 live modern slavery policing operations in December 2016, rising to 295 in April 2017, and to at least 1370 live operations by April 2019.

This update provides a comparison of the live police operations being undertaken by police forces across the UK, including PSNI and Police Scotland in April 2017, April 2018 and April 2019 to highlight changes. This only includes operations that the MSPTU Insight Team have been made aware of. This report is based on data correct as of 2nd May 2019 and reflects the latest information available to the Programme.

## All policing regions are reporting an increase in live modern slavery investigations

Forces provide information on live investigations to the Programme, which are combined here to provide a total for each policing region. There are some variations in the ability of forces to provide data, although the overall trend clearly shows increasing policing activity in connection to potential modern slavery offences.



## Understanding the context within modern slavery operations

**There has been an increase in the number of operations taking place to tackle the different types of exploitation. Investigations frequently identify that more than one form of exploitation is taking place. This analysis has been based upon the primary way in which investigators indicate that people are being harmed.**

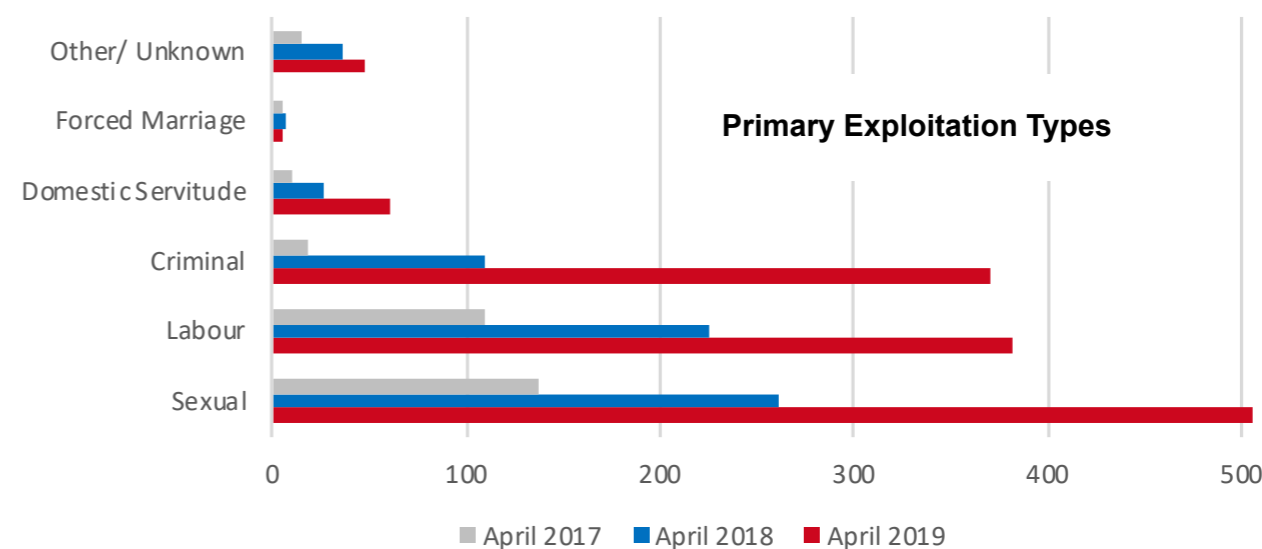
Sexual exploitation was the primary type of slavery in 505 operations in April 2019, an increase of 266% from April 2017 when there were 138 operations. This increase is likely partially due to increased recognition of the potential to use Modern Slavery powers to tackle Child Sexual Exploitation.

Labour exploitation was the primary type of slavery in 382 operations in April 2019, an increase of 250% from April 2017 when there were 109 operations.

Criminal exploitation was the primary type of slavery in 370 operations in April 2019, an increase of 1956% from April 2017 where there were only 18 operations which recognised criminal exploitation as a form of modern slavery. Of the investigations recorded in April 2019, 220 were primarily tackling criminal exploitation within drugs distribution "county lines". Such a large increase is likely to indicate increasing recognition of the exploitation taking place within these type of criminal activities.

Domestic servitude was the primary type of slavery in 61 operations in April 2019 an increase of 510% from April 2017 where there were only 10 operations.

Forced marriage was the primary type of slavery in 5 operations in April 2019, the same number as April 2017.



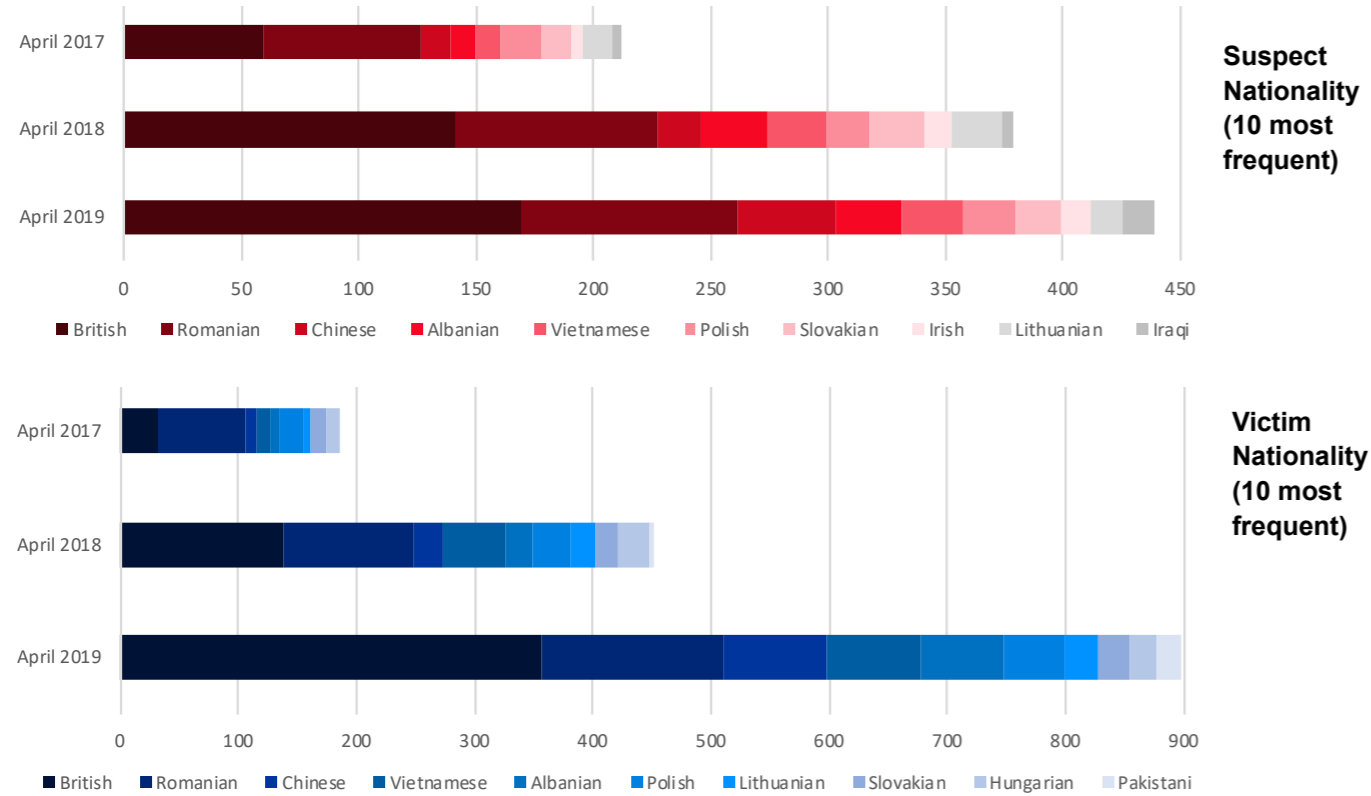
**Operations involve victims and suspects from a wide range of nationalities, with noted increased in British victims and / or British suspects.**

Live investigations often include fragmented information, as intelligence is developed. In approaching 60% of operations, nationality is known. This data shows the number of operations involving victims or suspects of these nationalities, not the number of individuals involved.

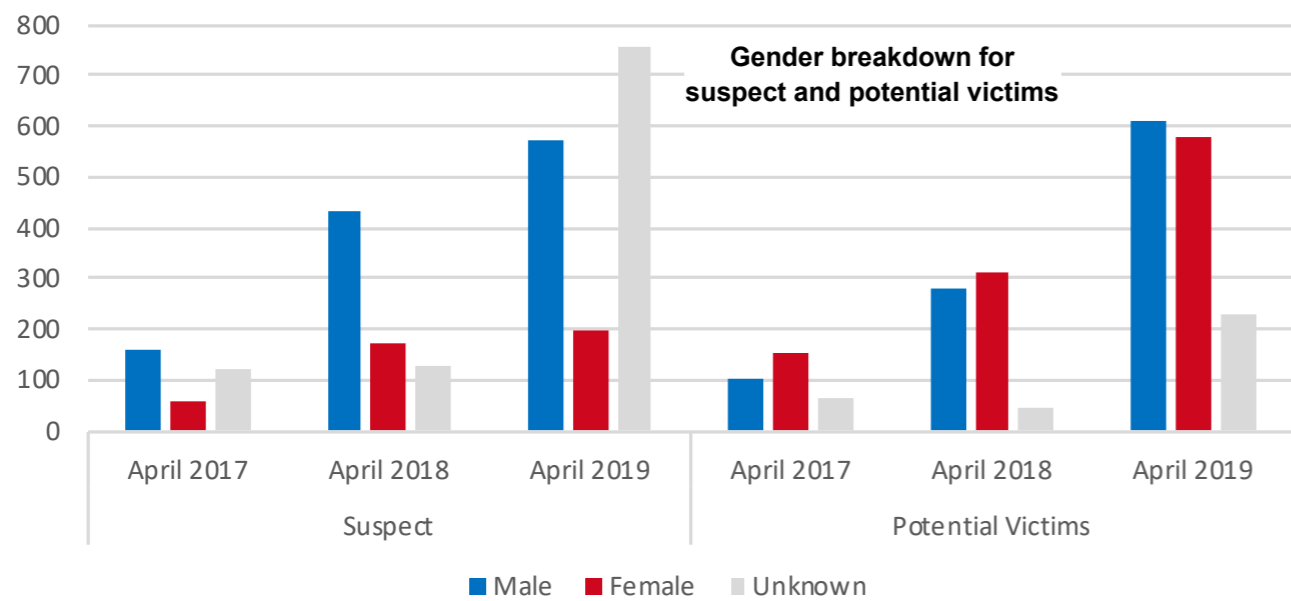
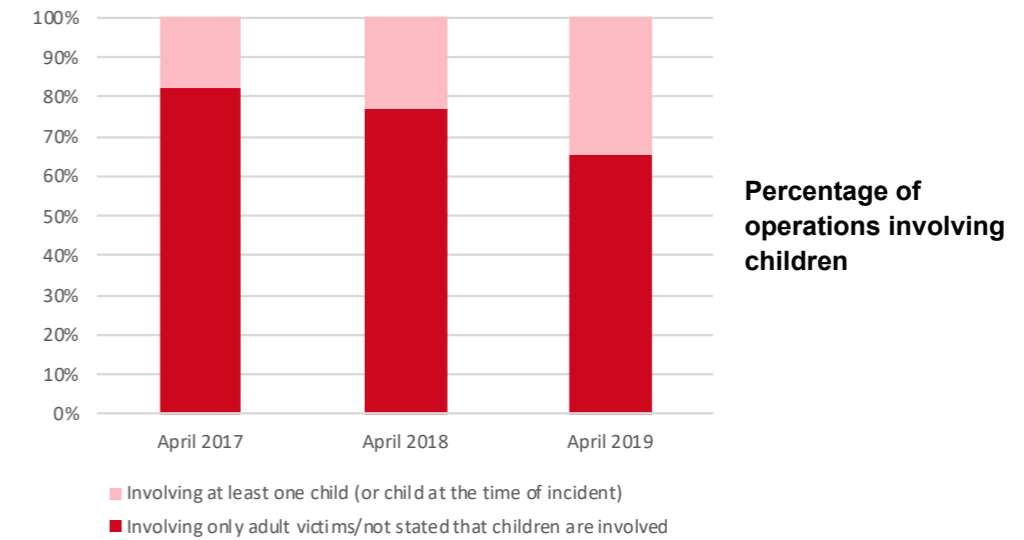
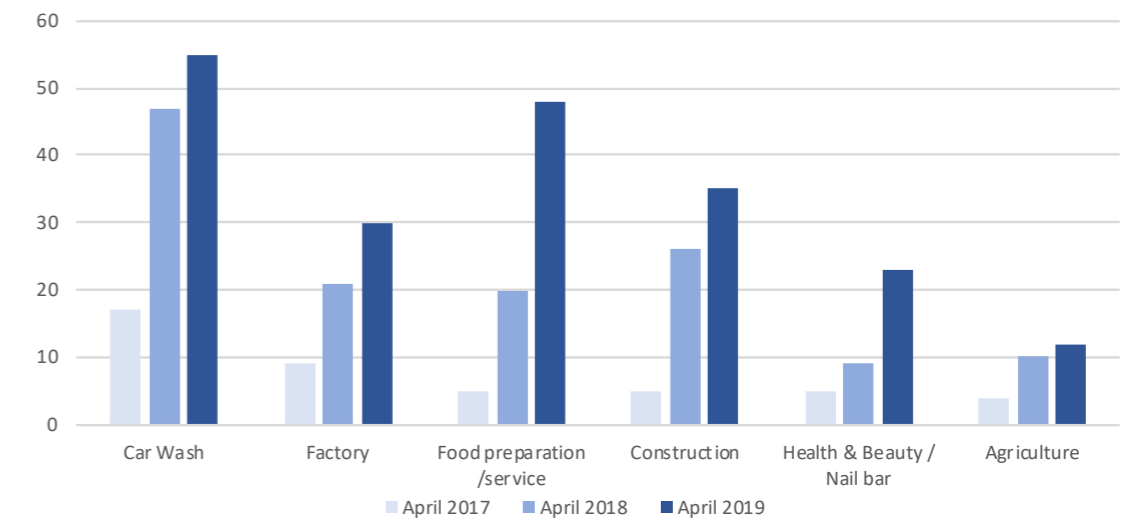
Other nationalities, identified less frequently over this period include (non-exhaustive):

Suspect Nationalities: Afghani, Brazilian, Bulgarian, Czech, Egyptian, Hungarian, Indian, Iranian, Italian, Japanese, Kosovan, Latvian, Malaysian, Nigerian, Pakistani, Portuguese, Somalian, Syrian, Thai, Turkish.

Victim Nationalities: Bangladeshi, Bulgarian, Czech, Eritrean, Ethiopian, Ghanaian, Indian, Iranian, Iraqi, Japanese, Latvian, Malaysian, Nigerian, Spanish, Sri Lankan, Thai, Turkish.

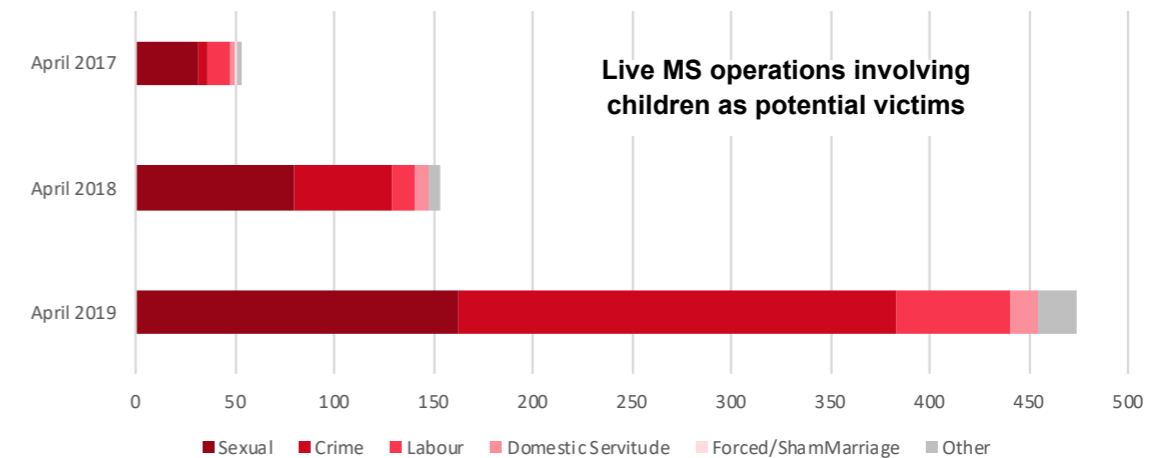


**Common labour exploitation sub-types**



Almost equal numbers of males and female potential victims are being identified in April 2019, compared to more females than males in previous years. It is highly likely that transgender individuals are not recognised within the dataset due to a lack of understanding and limitations within data recording. Males remain the most prevalent identified suspect gender.

**Live MS operations involving children as potential victims**



Modern slavery affects both adults and children. Sadly, children and young people are being exploited in all of the same ways as adults.

The number of child sexual exploitation and child criminal exploitation investigations recognised as modern slavery has increased significantly. The intensification of effort to tackle drugs distribution through "County Lines" and a growing recognition of some forms of child sexual exploitation as modern slavery are amongst the factors prompting the rise in these cases.

# Supporting the wider response to modern slavery

The Modern Slavery Police Transformation Programme is part of a much broader cross-government endeavour to ensure that local and national government departments, business and public sector efforts are all aligned behind the UK's response to the global call to action on modern slavery. This includes ensuring that associated criminal justice and victim support systems become more effective.

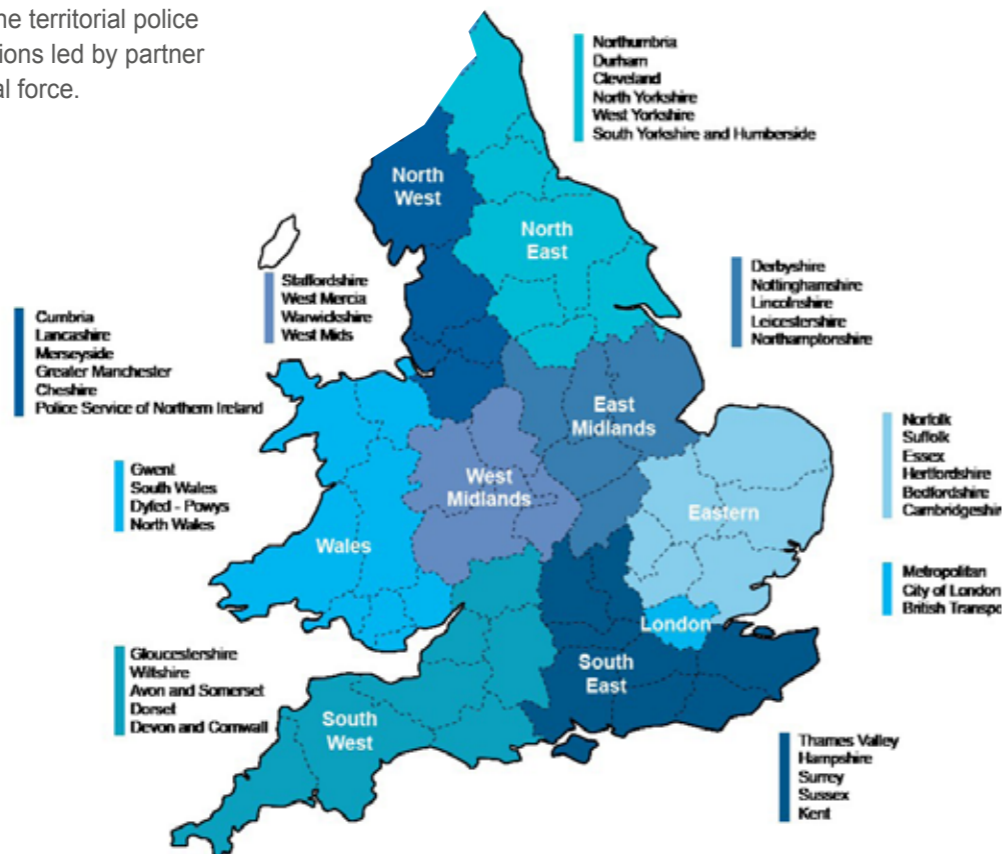
Police forces pay a critical role in identifying and detecting instances of modern slavery, in locating and protecting victims, and are well placed to support community-wide efforts to prevent the circumstances in which offending can take place.

The vast majority of modern slavery investigations within the UK are led by one or more of the territorial police forces, and it is rare that investigations led by partner agencies do not also involve a local force.

The police service therefore holds a broad base of information, expertise and experience that is useful in designing wider policy or practices and in identifying where there are opportunities to improve the response or to take preventative action.

The Programme provides the resources necessary to extract this knowledge from the 43 forces in England and Wales, to disseminate findings to partners, and to invest energy in resolving challenges.

Having now invested in this two-year change programme, policing is also well placed to share lessons with other sectors who have more recently begun to understand how they can help to combat modern slavery.



- Our team this year included staff within:**
- Devon & Cornwall Police (the Lead Force)
  - Devon, Cornwall & the Isles of Scilly OPCC
  - Europol
  - National Crime Agency
  - Border Force
  - Immigration Enforcement
  - GLAA
  - HMRC
  - NERSOU (NE ROCU)
  - TITAN (NW ROCU)
  - Yorkshire & Humber ROCU
  - ROCUM (West Midlands)
  - TARIAN (Welsh ROCU)
  - SWROC (South West ROCU)
  - SERCOU (South East ROCU)
  - EMSOU (East Midlands ROCU)
  - ERSOU (Eastern ROCU)
  - Metropolitan Police Service
  - West Yorkshire OPCC

“ With the real-world resourcing challenges that policing faces, the reality is that responding to modern slavery in the way we would like to is challenging. We have made and will continue to make progress by bringing people, partners, communities and police forces together to galvanise action and innovation  
**Chief Constable Shaun Sawyer, Devon & Cornwall Police** ”

# Over the past year the Programme has enabled:

## Policy development

- The provision of regular updates detailing the policing response to the Prime Minister's Implementation Task Force, and the joint delivery of actions arising from the Task Force with the Cabinet Office, Attorney General's Office, Home Office and Crown Prosecution Service.
- The provision of intelligence assessments to inform overseas aid and development activity in order to prevent conditions of exploitation.
- The provision of information to inform the Joint Intelligence Committee and the National Security Council to assess the threat to the UK from modern slavery.



## Coordination of the law enforcement response

- Access to a shared understanding of the threat and an improving understanding of performance across the criminal justice system.
- The identification of opportunities to work more effectively together in order to prevent exploitation, protect victims and pursue offenders, through supporting the National Crime Agency's Strategic Governance Group and Threat Group activity.
- The coordination of the operational response to national tasking and the facilitation of multi-agency training, debriefing and lessons learnt activity. This assists police, prosecution and victim support partners to understand what good practice looks like from a range of perspectives.

## International strategic collaboration

- Support to map progress towards United Nations Sustainable Development Goal 8.7, the eradication of forced labour and modern slavery by providing police research to the UN Delta 8.7 platform.
- The facilitation of international collaboration between international law enforcement agencies, researchers and multi-national tech companies, through participating in the UN Code 8.7 projects.
- The facilitation of support for embassies and commissions interested in working more closely with the UK to tackle modern slavery, through sharing good practice about the territorial policing response.



The Sustainable Development Goals set by the United Nations are the blueprint to achieve a better and more sustainable future for all. Target 8.7 calls for states to **take immediate and effective measures to eradicate forced labour, modern slavery and human trafficking by 2030 and the worst forms of child labour by 2025.**



## International operational activity and capacity building

- The provision of additional resources within Europol's UK Liaison Bureau and the NCA's Project Phoenix in order to assist UK forces to make enquiries with and run investigations alongside forces in other countries, resulting in an increase in the volume of intelligence exchange and in the number of formal joint investigation teams (JITs).
- The development of guidance to assist investigators with international enquiries.
- Support for police and NGO victim care partners in Poland, Vietnam and Romania, through sharing resources for capacity building and through joint scoping for collaboration opportunities.

## Case study

Amongst forces investigating modern slavery cases with an international footprint was Derbyshire Police. Initial enquiries and subsequent collaboration initiated through Europol led to the complete dismantling of a Latvian-organised crime group profiting from labour exploitation in and around Derby. As part of operation DOUBRAVA, Derbyshire Police worked closely with Latvian police and authorities which resulted in nine defendants being convicted and jailed for a total of more than 33 years. The conspiracy that the investigation uncovered saw the offenders infiltrate local employment agencies and factories and then traffic victims from Latvia into the area for work. But instead of offering the chance of a better life in the UK, the traffickers stole the victims' salaries to fund their own lavish lifestyles.

## The Joint Slavery and Trafficking Analysis Centre (JSTAC)

The Programme enabled Border Force, GLAA, HMRC, Immigration Enforcement, National Crime Agency, and national policing to jointly establish the JSTAC in April 2017, providing the resources required to deliver a single, authoritative view of the threat by integrating intelligence from these and other partner agencies, and by identifying new sources of information.

## JSTAC | Joint Slavery and Trafficking Analysis Centre

During 2017/19, JSTAC issued more than 70 intelligence briefs, reports and assessments on a wide range of topics connected to modern slavery and human trafficking. Including 16 full strategic assessments, this work has helped to inform strategic decision making across government and by senior law enforcement leads.

Significant progress is noted in the NCA's 2018 National Strategic Assessment towards filling key intelligence gaps. This includes building a better understanding of the way offenders operate and the connections between modern slavery and other forms of criminality and exploitation.

### JSTAC - Assessment of key drivers of MSHT in the UK

- Economic imbalance
- Displacement of vulnerable people
- Demand for cheap labour and sexual services
- Prevalence of related criminality
- Ease of moving money upstream
- Permissive attitudes towards some forms of exploitation

### Support for NRM reform

The Programme has continued to support police forces to interact more effectively with the existing National Referral Mechanism and Duty to Notify processes, while also supporting the Home Office in their development of the new Single Competent Authority.

It is essential that victims are able to access the criminal justice system and that information about potential offenders is appropriately acted upon. In addition, NRM and

DTN data is one of the few national published data sources regarding modern slavery, and the need to improve the validity, reliability, and interpretation of the data has been widely recognised.

### The NRM team within the Programme has:

- Continued to support the improvement of police force processes relating to NRM/DTN referrals.
- Supported the NCA MSHTU to accelerate the progress of cases, particularly those related to young or otherwise vulnerable victims.
- Supported Immigration Enforcement and UK Visas and Immigration to improve the dissemination and quality of NRM information provided to police forces.
- Identified the causes of potential anomalies in crime recording and referral data and developed appropriate responses.

During 2018 the team has engaged with the NRM Reform programme on behalf of police forces in England and Wales. It has supported the Home Office and partners in understanding the implications for police processes and proposed changes to victim referral systems.

### Crime Recording

The Programme has supported the police service to increase the confidence in crime data integrity regarding modern slavery offences and crime-related incidents. The interpretation of crime recording rules (developed in 2015 in response to the Act) had varied between forces, in no small part due to the complexity of the offending.

Different rules and processes applied dependent upon whether the offence occurred inside or outside of the UK; whether the police or other first responders initially identified the victim; and how the local force had interpreted other crime recording and victim referral rules.

During 2018, the Programme's NRM team worked with the National Crime Registrar, with Home Office officials and with crime registrars in all forces to clarify crime recording processes. A new set of rules - N200 – has been approved and began implementation in April 2019. This clarification will help ensure that investigations are appropriately progressed and that data about police and criminal justice system outcomes becomes more accurate.

## Cross portfolio efforts to tackle modern slavery

Modern slavery offences encompass a wide range of offending behaviour. Some forms of exploitation have been understood for longer, or are closely linked with other organised criminality. As our understanding of modern slavery has developed, it is recognised that people are rarely exploited in only one way, be it by a single or multiple offenders. This makes it incredibly important for the NPCC and APCC portfolios to align their efforts when championing a response to different forms of exploitation or when focusing on protecting different groups of victims.

### During 2018 the Programme has:

- Collaborated with the NPCC/NCA County Lines Coordination Centre to produce guidance related to the criminal exploitation of children and young or otherwise vulnerable people by networks of organised criminals who distribute drugs. Investigators working in this area are able to access all of the Programme's guidance products that assist with investigating exploitation. A joint investigation guide is also being developed to highlight considerations linked to the use of modern slavery legislation in criminal exploitation cases.
- Shared lessons learnt across the exploitation portfolios, provided advice regarding data collection and intelligence development activity, and supported the assessment of the risks related to criminal exploitation within "county lines" cases.
- Collaborated with the NPCC Prostitution and Sex Workers portfolio on the development of investigative strategies and engagement activity in relation to adult services websites, which are identified as a key enabler of adult sexual exploitation. Together with the NCA the Programme hosted national and regional investigator events to upskill officers on this subject.
- Delivered the first holistic assessment of the risks surrounding the exploitation of missing children. Tasked by Chief Constable Shaun Sawyer as a priority for the National Threat Group, the Programme's Insight and regional analytical teams reviewed information about the 75,809 children who were reported missing in England and Wales over a 12-month period. The team used information from a wide range of policing portfolios, local and national departments and agencies, to identify opportunities to strengthen the response in order to better protect young people.
- Supported the NPCC Organised Immigration Crime portfolio in the development and promotion of guidance to policing related to clandestine entry, including advice on recognising exploitation indicators.

### Tim Champion of the National County Lines Coordination centre speaking at the national modern slavery CPD conference at Ryton in March 2019.



Alongside specialist resources, the overall success of modern slavery investigation is also reliant upon the resilience and performance of a number of different police capabilities that are not specific to slavery and exploitation. This includes, but is not limited to: the processes and systems through which intelligence and information is exchanged; analytical, detective, and financial investigation capabilities; digital forensics and data interpretation capabilities; interpreter services and disclosure processes.

In order to progress these issues, the Programme reports into and supports the work of the NPCC Crime Coordination Committee, and works closely with a number of policing and APCC portfolios, primarily through collaboration with the Vulnerability and Serious and Organised Crime National Policing Leads.

### During 2018 the Programme has:

- Supported by the Chair of the National Crime Operations Committee, the Programme collaborated with the Police National Database (PND) portfolio to design changes to the PND, enabling all forces across the country access to modern slavery information to support their investigations and protect those at risk of harm.
- Worked with wider portfolios to provide information about demand and processes linked to investigating modern slavery cases to inform changes to Serious and Organised Crime systems and to inform cross-government spending review processes.

“ Through the focus provided by this Programme, agencies have been galvanised into action on modern slavery when in the past it was a form of exploitation that wasn't at all well understood

Caroline Haughey QC

In collaboration with the Home Office the Programme team organised a national conference with crime registrars to review changes to the recording of modern slavery offences in England and Wales.



# Connecting information and data held by policing

**Modern slavery and human trafficking cases frequently involve the movement of individuals both within the UK and across national borders. This domestic cross-border offending is rarely contained within the geography of a single police force or the area covered by a regional organised crime unit.**

One case of exploitation may involve recruitment in one part of the country, offences taking place in multiple other locations, travel through multiple entry and exit points and across the domestic transport networks, and the identification of victims and offenders in yet more parts of the country. It is common that forces only have partial or fragmented information, particularly about the enablers of exploitation, recruitment or transportation locations.

The 43 police forces in England and Wales use a complex network involving hundreds of different IT systems. The Programme is working with those responsible for increasing connectivity between these systems in order to improve the way in which information and intelligence is shared, so that cases of exploitation are identified as early as possible. Over the course of the year the Programme has supported improvements to the Police National Database (PND) in order to make modern slavery information easier for investigators to access.

Within England and Wales there are nine regional organised crime units, each of which has hosted members of the Programme's regional transformation teams. These resources have worked to ensure that the forces in their region better understand their local threat and are supported to improve their response. Together, the teams facilitate increased connectivity across the country.

The National Policing Insight Team, supported by regional analysts in the ROCUs and the Programme's regional analyst in the Metropolitan Police Service provides a capability to collect and collate information about modern slavery investigations happening in all parts of the UK.

Partners including Border Force, DWP, IE, GLAA, HMRC, alongside Police Scotland and Police Service Northern Ireland, contribute to the Insight Team's monthly operational overviews, which are shared across UK law enforcement and with key partners. This type of regular data about the breadth of criminal investigations happening across the country is not routinely available for other types of crime, outside of terrorism.

This dataset now includes contextual information about 3,450 open and closed modern slavery investigations, which can be used to identify trends and changes in modern slavery crime types in the UK, and to get a clearer

picture of the background of victims and offenders. This enables police and partners, such as the Home Office Policy and Research team, to better understand the different forms that exploitation takes in order to design more specific interventions.

During 2018, the Insight Team has delivered:

- Monthly operational overviews reflecting police activity in connection to modern slavery across the UK.
- More than a dozen strategic analytical reports identifying trends and helping to improve understanding of modern slavery victims, offenders and offending. This included a major study and holistic review of data relating to missing and exploited children.
- A series of tailored analytical products to inform pre-briefing in advance of Project AIDANT intensification activity, and as an input into the development of guidance products.
- Collaborated in the development and delivery of improvements to the Police National Database to upgrade the tracking and sharing of intelligence connected to MSHT cases.
- A range of infographics products help educate stakeholders and partners on the nature and means of modern slavery offending.

The team has also supported hundreds of local police intelligence staff to improve their ability to identify and analyse cases of modern slavery through the provision of CPD days, conferences and roadshows.



**In April 2019 the Insight Team was presented with an Award for Excellence by the International Association of Law Enforcement Intelligence Analysts. The award recognised the contribution made by the team to broadening awareness and understanding of modern slavery within the UK law enforcement community.**

“Our understanding of victims and of the complex landscape of exploitation has come so far over recent years. The Programme has helped to support the availability of this specialist expertise, which is important for police forces as they look to tackle this type of crime

**T/Superintendent Phil Brewer,  
Specialist Crime and Vulnerabilities,  
Metropolitan Police**

## Modern slavery brings new challenges

For police and prosecutors used to dealing with conventional crime, responding to modern slavery can require a change of mindset, especially in understanding victim behaviour. It means looking at all offending, from begging, to shoplifting, to prostitution and to county lines in a three-dimensional way. Professionals need, then, to ask, “what are we really dealing with here?” and “why is this really happening?”. Understanding how and why exploitation could be taking place is critical, especially when victims don't immediately come forward.

### Modern slavery offences are complex, often hidden and may not be what they seem:

- Modern slavery involves the exploitation of human beings being treated as commodities. Unlike murder, fraud or theft, there is no dead body or reported loss to investigate. Victims often do not come forward so cases may not be immediately visible.
- Crimes are rarely based in one location or area. The transfer and trafficking of individuals is often involved and may also be connected to other forms of criminal activity within the UK and internationally.
- Cases almost always involve multiple offences, different forms of abuse and multiple defendants. Potentially tens or even hundreds of victims can be involved.
- Cases can initially present as other crime types such as drugs offences, begging, identity fraud, benefit fraud, petty theft, overcrowding, anti-social behaviour or labour abuse.

### Offenders control their victims – most often as part of organised crime:

- Offenders establish controlling relationships with victims through coercion, threat or deception. Victims can become reliant on the people who exploit them. Offenders target victims for their specific vulnerabilities.
- Offenders rarely act alone often working with associates. Individuals may have specific or defined roles within crime groups and may not be aware of the total picture of offending.
- Offenders see victims as property. It is possible that offenders may not consider that what they are doing is wrong. They may argue they are providing opportunities for their victims.
- Offenders seek multiple ways to extract maximum value from victims through benefit or identity fraud, sexual abuse, labour exploitation and/or or servitude.

### Victims, whether British and foreign nationals will be subject to control, coercion or deception:

- Victims will always have been either threatened or deceived. Once recruited they will be subject to continuing control and coercion.
- Victims can be dependent on and even loyal to those who exploit them. They may feel uncomfortable working with the police. Fear for self or family, suspicion of the authorities, shame or embarrassment may mean that victims are often unable break out of their exploitative situation.
- Victims can be recruited or groomed to commit crime on behalf of others. Children and vulnerable adults are specifically targeted for this purpose.
- Victims may accept their experience as being inevitable given the limited alternatives available to them. They may not consider themselves to be victims.

### The challenges for investigators and prosecutors:

- Cases are complex. Without direct testimony from victims, identifying and evidencing modern slavery can be challenging.
- Balancing the risk of harm to victims with the need to collect evidence about continuing exploitation is a frequent dilemma for investigators.
- Investigations require detailed planning. Early collaboration with the CPS, other forces, and national/international LEA partners is often needed.
- Full investigations may need specialist resources including financial and digital media investigators, intelligence analysis and covert tactics.
- Case building requires the collection, interpretation and collation of multiple sources of (often digital) evidence which is often also in multiple languages. Exhaustive case preparation is required including consideration of disclosure.
- Cases take longer to prosecute due to their complexity and the increasing number of offenders, victims and witnesses involved in cases.
- Supporting victims throughout their case requires constant support by trained specialists. If this support is not effective, the prospects for successful prosecution can be jeopardised.

## Supporting police forces with a framework for improvement

During 2015 it was identified that police forces in England and Wales had varied structures in place to support officers dealing with cases connected to modern slavery and that partnership responses were also very inconsistent. Even those forces that had more direct experience of human trafficking and modern slavery had few embedded processes in place, and experience was often limited to a small cohort of investigators who had personal experience of these types of cases.

The first national policing action plan on modern slavery was shared with forces as a guidance product in 2015, as the Modern Slavery Bill was enacted. In 2016 the NPCC portfolio updated the national action plan and forces took part in a benchmarking exercise in order to identify thematic areas where improvement was needed. The Modern Slavery Police Transformation Programme was designed to support forces to address those themes.

In January 2018, the Programme was able to refresh the national action plan in line with HMICFRS recommendations and to reflect the good practices that the members of the Programme team were identifying in working with different forces across the country.

The action plan provides a strategic check list detailing 52 activities and processes, grouped into 13 overarching themes. It provides a framework for forces to use in ensuring that local practices and policies reflect identified good practice.

Members of the Programme's regional transformation teams have worked with those responsible for the delivery of modern slavery responses in each police force to review progress in the implementation of the action plan. Forces can also access support from the central Modern Slavery Police Transformation Unit (MSPTU) to deliver training and to advise on good practice.

The MSPTU and NATMSN network have supported chief constables, chief officers and PCCs to better understand and to shape the national action plan through a series of engagement events.

“ From meeting with senior police officers I can see that they increasingly take MSHT seriously. I hear about examples of improved evidence collection and I know they can increasingly see the close connection between modern slavery offences and other types of crime.

Caroline Haughey QC

### National action plan – Overarching themes

#### Leadership and governance

- 1 Senior leaders demonstrate their commitment to addressing modern slavery and trafficking.
- 2 Modern slavery has the required governance and oversight, to reassure senior leaders that there is an effective response.

#### Recording, reporting and use of intelligence

- 3 The local prevalence of modern slavery and trafficking is understood, assessed and shared.
- 4 Officers understand the key national strategic questions, and as far as practicable use each investigation to help further our understanding of this type of harm.
- 5 NRM and Duty to Notify is embedded, and adequate records of referrals are kept.

#### Victim safeguarding

- 6 Effective partnership arrangements are in place to co-ordinate activity, to share information and safeguard victims.
- 7 The threat of modern slavery is understood within existing safeguarding framework.
- 8 Forces understand the local modern slavery threat picture and raise awareness within their communities.

- 9 A victim-centred approach to modern slavery is in place.

#### Investigations

- 10 The initial investigative response to modern slavery is effective.
- 11 Modern slavery is thoroughly investigated and effectively supervised by teams and individuals with the skills and experience to undertake them.

#### Officer and staff training

- 12 Forces have access to College of Policing accredited learning products on modern slavery, in order to raise awareness and capability among all frontline staff.
- 13 College of Policing should work to improve knowledge and expertise in investigators up to senior investigating officer level, drawing on the experiences of all police forces.

## Regional co-ordinators and analysts – An expert network helping forces to prepare, improve, investigate and respond to modern slavery offending

**The Programme's network of 10 regional coordinators, embedded within each regional organised crime unit (ROCU), have accelerated the pace at which lessons learnt about improving police and partnership responses to modern slavery can be cascaded and shared between different police forces.**

Police forces undertake more investigations into modern slavery than any other agency, and these investigations are most commonly managed at a local level. The presence of the regional coordinators has helped mitigate challenges resulting from the high turnover of staff within forces. As a group of professionals they provide a local resource with the time and expertise needed to identify and spread good practice.

The coordinators are supporting forces to collaborate more effectively. The number of local, regional, national and international partners engaging with individual police forces about modern slavery is steadily increasing. By offering expertise, guidance and support they assist investigators to overcome operational or investigative challenges, and help ensure that partnerships understand and take informed action against the most significant threats in their area.

The regional coordinators have assisted ROCUs and forces to ensure that established processes to manage serious and organised crime can also be used to further modern slavery investigations. The team has promoted an understanding of the ways in which the Modern Slavery Act can be applied to different types of exploitation and have supported the National Crime Agency and Home Office to better understand trends.

**Over the course of the year, the regional coordination teams have:**

- Assisted forces to implement the national policing modern slavery action plan and establish a regional focus on the continuous improvement of activity.
- Provided advice and practical support within live investigations and in the development of prevention and disruption activity.
- Supported forces to access the products, events, and support provided by the Programme and fed back opportunities to improve these.
- Identified and assessed good practice and lessons learned, by debriefing investigations and supporting case file reviews.
- Supported forces to coordinate and pursue international enquiries with intelligence and law enforcement partners.

- Ensured forces are aware of changes and good practice identified in relation to national processes, such as data collection, crime recording, and referrals of vulnerable people.
- Developed networks within policing and with external partners in order to progress investigations, improve victim support and deliver collaborative prevention activity.
- Supported national days of action, intensifications, and intelligence gathering campaigns.
- Developed and promoted stronger understanding of the local threats in relation to modern slavery and identified opportunities for targeted prevention work.

**The other key players in the regional transformation teams have been the regional analysts who provide local forces and PCCs with intelligence-led insight in to the nature and scope of potential modern slavery offending within each ROCU area.**

This includes work to identify regional trends relevant to forces in the region. Activities of the regional analyst team over the last year have included:

- Contribution of regional data to the strategic reports produced by JSTAC and the national modern slavery Insight Team.
- Working with intelligence partners, within law enforcement and externally, to develop the regional intelligence picture connected to modern slavery. Identifying intel-led investigative and prevention opportunities and supporting live operations as appropriate.
- Briefing police forces and PCCs on the value of the national modern slavery and intelligence analytical products developed.
- Acting as a focus within the intelligence community for the development of modern slavery analysis skills and best practice. The team also supported the delivery of analyst and researcher CPD events.

“ The regional coordination teams have been a godsend. We now see issues and insights that come up in one force flagged almost automatically across the whole network. It means we can share information faster which accelerates the response

Phil Brewer – Metropolitan Police

# Review, learn and improve – Sharing “what works” from prior modern slavery cases and prosecutions

## Identifying good practice and sharing the knowledge across policing

Enacted in 2015, the Modern Slavery Act is still a relatively new piece of legislation. Police experience in the investigation and prosecution of offences committed under the Act is still limited compared to many other types of crime, although it is starting to develop rapidly as more cases are identified.

Within that context it is important that police, law enforcement and criminal justice partners benefit from the good practice identified and lessons learned from prior investigations and prosecutions. Gathering and sharing this evidence base across policing has been a major focus area for the Programme.

More than 93% of police forces in England and Wales have collaborated in this process either through the detailed debriefing of individual operations, or through “force-level” case file audits wherein several MSHT cases would be reviewed on a force-by-force basis. Other law enforcement agencies including regional and organised crime units and Immigration Enforcement have also participated. A total of more than 400 investigations have been reviewed as part of this process.

## Building a central evidence base through the detailed debriefing of prior investigations

The “What Works” Team with the Programme has facilitated the detailed debrief of 40 investigations where extensive relevant learning has been identified. These had been led by 20 police forces, three regional and organised crime units (ROcUs) and in one case by Immigration Enforcement. A further prosecutors’ workshop was also held in February 2018 to review learning emerging from MSHT prosecutions to that point. Regional co-ordinators also contributed learning identified through 35 smaller operational debriefs conducted locally.

Through this activity the team has distilled the details of good practice and lessons learned to create a central library of policy, guidance and shared information that is of significant value to police forces in developing their response to MSHT cases.

The learning identified has also been translated into the range of training and guidance products produced by the Programme team. In more than 30 cases, participating forces have approved the individual debriefing reports being made available across policing and law enforcement as a learning resource.

## Case-file reviews: Working alongside detectives to look at improvement opportunities.

Additionally, 36 forces have taken part in modern slavery “deep dive” case file reviews. This activity connects expert practitioners and peers from the MSPTU team in one to one interviews with police investigators to review the progression of past and current MSHT cases. Several cases are reviewed as part of each three day case file review session.

This process initially started as an activity solely focussing on historical cases to identify good practice and lessons learned for the forces participating. More latterly the focus shifted to considering live cases with the objective of supporting on-going improvement in investigative standards and prosecution outcomes.

On completion of a review, individual case file reports are provided to each of the forces participating. These reports are confidential although summaries of the main lessons identified are made available to police and law enforcement agencies. These summaries provide valuable insight into the reoccurring issues and challenges that police face in the investigation of MSHT cases.

“ The sharing of experience, knowledge and lessons learned across law enforcement agencies has been of immense value. Working closely with the programme has given us all a more informed picture of the challenges

**Pam Bowen, Senior Policy Advisor,  
Crown Prosecution Service**

## Sharing of good practice through training and guidance products

From the debriefing and case file review processes, a range of practical evidence-based guidance and training products has been developed. Findings from this work are also incorporated into the development of new and updated training and CPD materials as the modern slavery investigation evidence base has grown over the life of the Programme.

In total, 25 separate guidance products have been developed and published for both internal and external stakeholders. This is in addition to the individual debriefing reports produced by the “What Works” Team. All of these items (summarised in the product list over on page 27) are available to policing and law enforcement agencies online via the modern slavery community on the College of Policing POLKA system.

## Supporting the 2018 Independent Review of the Modern Slavery Act (2015)

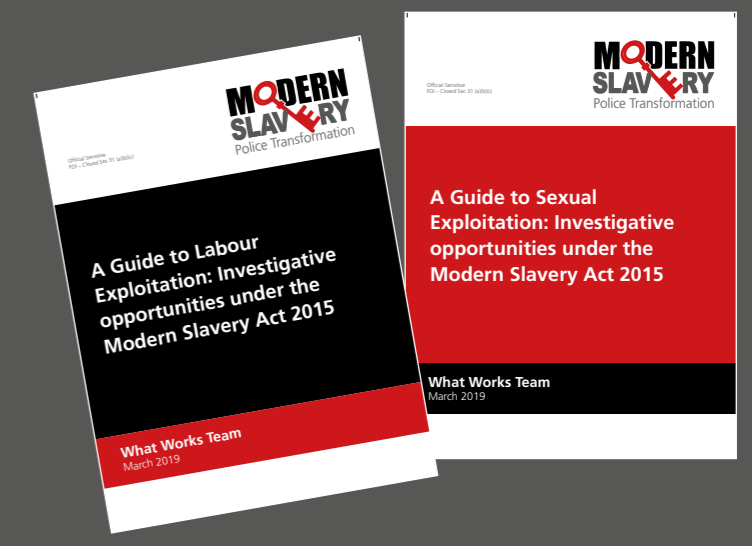
The Programme’s MSPTU teams have participated in focus groups and data gathering to inform the ongoing Independent Review of the Modern Slavery Act (2015). The Programme supports many of the emerging recommendations from the Independent Review and welcomes parliamentarians’ continued interest in the effectiveness of the operation of the Act.

The MSPTU “What Works” Team is particularly pleased that the evidence they provided has helped to inform a recommendation that Crown Court judges be able to issue Slavery and Trafficking Risk Orders. This was something the existing legislation had not allowed for, limiting this power to the Magistrates Court. The team’s debriefing activity evidences this as a practical barrier to greater uptake of STROs.

## One-stop investigative guidance

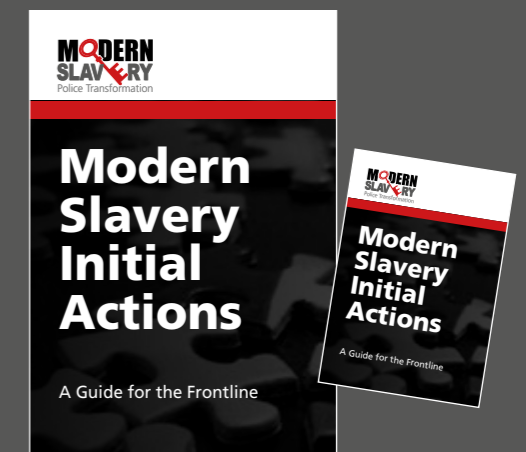
Comprehensive step by step thematic investigation guides are available to police forces to support specialist investigators and others in their response to sexual and labour exploitation cases. These products were published in March 2019 and integrate all the relevant modern slavery guidance materials available for that type of investigation into one document.

A third guide on the investigation of criminal exploitation in relation to the Modern Slavery Act is also in development.



## Guidance for frontline officer and police staff

An “Initial Action” guidance product and pocket guide aide-memoire for frontline policing teams was also published in March 2019. These guides support frontline non-specialist officers with the immediate responses needed when encountering victims or scenes of crime where modern slavery offences are suspected. These guides document the vital “golden hour” actions needed to ensure that appropriate victim safeguarding and support, evidence collection and other investigative actions are put in place as soon as possible.



## Indicative good practice: Themes identified from debriefing activity

Frontline teams (including PCSOs, Specials, volunteers and call handlers) are able to recognise the indicators of MSHT within day to day business. This ensures safeguarding processes and investigations are instigated as quickly as possible. Regular refresher training should be conducted.

Having identified potential victims of MSHT and/or MSHT offences, frontline staff know where access help and guidance on both safeguarding the victims and investigating the crime. MSHT investigations are complex and challenging, but thankfully still rare. Expecting busy frontline officers and staff to be experts in a crime type they may never have experienced before is not realistic.

The availability of specialist support (involving financial investigators, data analysts, disclosure officers and victim care specialists) is consistently required in modern slavery investigations. Where needed, this support should be identified and requested early. The tasking process at local, regional and national level is utilised to ensure cases are delegated to appropriate teams and specialist support is secured by the investigation team as appropriate.

Body worn video is proving to be of increasing value in modern slavery investigations. BWV provides crucial evidence relating to the demeanour of victims, conditions in which they are found living or working and in capturing first accounts or conversations. Wherever possible, body worn cameras should be used to capture this "golden hour" evidence on days of action.

Early engagement with the CPS colleagues, and in particular the CPS Complex Crime Unit, made a material difference to the efficiency and potential success of investigations. Investigators are advised to ensure modern slavery cases are always referred to the CPS Complex Case Unit for early investigative advice.

The use of Slavery and Trafficking Risk and Prevention Orders is proving to be a valuable tool in disrupting the activity of organised crime groups (OCGs). They assist in protecting victims and in restricting the activities of offenders and suspected offenders by providing opportunities for prosecution, even before substantive charges under the Modern Slavery Act have been heard in court.

Victim care and engagement continues to be an area critical to the success of modern slavery investigations. Operations that used either specialists (from within policing or from NGOs or partner agencies) or dedicated officers to lead on victim engagement and support achieved better criminal justice outcomes.

Whilst there should be a victim centred approach to MSHT investigations, those that also sought evidence from a wide range of sources and did not rely solely on victim testimony were more likely to secure convictions. For example investigations that invested in the use of covert tactics and financial investigation were more likely to secure charges and convictions than those that relied heavily on victim testimony.

The use of SIENA2 messaging to share and request intelligence, via Europol with other foreign law enforcement, should be a prerequisite for any investigation that has an overseas footprint. A number of cases reviewed gained vital intelligence and overseas safeguarding support that was crucial to the progress of the UK investigation.

Partnership or multi-agency approaches to investigation and victim support consistently produce better results than any single agency could achieve. Forces achieve better results through collaborative working where specialist modern slavery or exploitation crime resources are in place.

## Supporting practitioners on live cases and continuing improvement

### Quick time support for investigators and policy makers.

Having reviewed hundreds of modern slavery and human trafficking cases, the Programme's MSPTU teams have developed significant expertise and insight into the drivers of success and into the potential pitfalls connected to complex modern slavery investigations. Investigators benefit from the advice and guidance now available via online toolkits, but also through the team acting as a critical friend to review investigative strategies, directly supporting or signposting investigators to help provided through a network of contacts who can assist in overcoming challenges in modern slavery cases.

Policy makers and parliamentarians are also able to access the body of knowledge within the MSPTU teams, as a starting point for understanding new trends or developing responses.

“ In a modern slavery investigation, decision making can be time critical, so being able to access this support over the phone or in person during emerging incidents has proved invaluable  
Detective Superintendent Andrew Munday, Modern Slavery Police Transformation Unit.

# Guidance products

## Guidance products available to police and law enforcement agencies

### Guidance relating to debrief and case file review activity:

- Over 30 individual operational debrief reports are available to all law enforcement featuring good practice and lessons learned in each case
- Case file review summaries are available to NPCC chief officers providing background to the generic findings from more than 330 investigations reviewed

### Investigation guidance on specific topics:

- Guide to undertaking international criminal enquiries
- Guide to developing MSHT victim and witness strategies
- Guidance for the safeguarding of children who may have been trafficked
- Guide to identifying vulnerability & exploitation at hand car washes:

### Investigative Opportunities under the Modern Slavery Act 2015

- Information and guidance in relation to Slavery and Trafficking Risk Orders (STROs) and Slavery and Trafficking Prevention Orders (STPOs)
- Utilising adult service websites to identify potential victims of sexual exploitation
- Lessons learnt from Modern Slavery Act 2015 prosecutions

### Frontline guidance:

- Initial Actions at scenes of modern slavery – Guidance booklet and pocket book "aide-memoir"
- S45 Modern Slavery Act 2015 defence (refreshed 2019)
- Modern Slavery Aide-Memoire (Pocket note book insert)

### Thematic investigation guides:

- Labour exploitation: Investigative opportunities under the Modern Slavery Act 2015
- Sexual exploitation: Investigative opportunities under the Modern Slavery Act 2015

### Video masterclass materials are also available on a range topics

- Victim engagement
- Multi agency partnerships
- Labour exploitation
- Covert tactics
- Introduction to Europol
- Challenges presented by modern slavery

“ All agencies rely heavily on the Modern Slavery Police Transformation Unit and the tools it produces. Without the Programme having been in place policing would not be anywhere near where it is now in being ready to tackle these crimes  
Deputy Chief Constable Dave Lewis, Dorset Police.

## Training, engagement and professional development

### Broadening awareness of modern slavery and human trafficking at all levels in policing - and providing training on the responses required

Prior to the establishment of the Programme no nationally accredited police training on modern slavery existed. Individual forces had developed content based on materials from NGOs, or were inviting NGOs to deliver awareness sessions locally. However, this was in isolation of any overall co-ordination of training outcomes targeted for delegates or of the content to be included.

This lack of a consistent approach to training and associated continuing professional development, particularly for investigators, was a key area for improvement highlighted by Caroline Haughey in her 2016 review of the Modern Slavery Act.

In response, the Programme team took a holistic approach to assess the training needs of colleagues at all levels within the policing family, reviewing what training was already available and where training gaps existed. This needs assessment was conducted for all roles from frontline PCs, staff and volunteers, through to call handlers, within investigative and intelligence teams, and right up to strategic leads and Chief Constables.

In addition to general awareness raising activity, a particular focus has been placed on the development and delivery of training targeted for colleagues in investigative and intelligence roles. Understanding victim psychology and the business models used by offenders are central to being able to identify and unlock modern slavery cases. That's why it is so important that staff in these specialist roles have been specifically trained in how to support victims, respond to live cases and develop prevention activity.

Throughout 2018/19, the training co-ordination team developed and directly delivered a number of training products, activities and events to respond to needs identified both at the outset, and through continuing re-assessment of emerging requirements. This led the team to focus on the development of:

- National training courses and training support materials formally accredited by the College of Policing.
- Specialist CPD-led training and engagement programmes developed and delivered to forces through regional roadshow and workshop events.
- Specialist and/or thematic CPD-led events developed and delivered by the Programme at national conferences and events.

### Continuing update of content and materials

Wherever possible, training content and guidance materials published reflect the latest view of good practice and lessons learned identified through;

- On-going operational debriefing and case file review of prior MSHT cases;
- New intelligence insights and understanding identified;
- Emerging specialist input provided by investigators and partners.

The majority of training content developed by the Programme is also underpinned with the publication of associated guidance materials which once produced, are also regularly updated. All guidance and CPD support materials are available to UK law enforcement via the modern slavery community on POLKA. College of Policing accredited training materials are available to police forces via the NCALT system.

### Direct delivery of training

Since 2017, the Modern Slavery Police Transformation Unit has directly delivered training to more than 4,000 police officers and law enforcement staff at more than 140 separate events. The majority of these events were held in 2018/19. All forces in England and Wales, Scotland and Northern Ireland along with the NCA, GLAA, CPS and Home Office, have participated in training activity. Government agency partners including DWP, HMRC, Home Office, Immigration Enforcement and several NGO and academic partners have supported the delivery of the events.

### Training support for partners

In addition to the development and delivery of core training materials and events within the policing family, members of the Programme team also provided input at a wide range of other events by request. This has included:

- Briefing and CPD activity organised for police forces, by the College of Policing, ROCUs, and other law enforcement professional bodies.
- Home Office funded training for international law enforcement partners.
- Presentations delivered at public sector partner, NGO, anti-slavery partnership, academic and faith group partner events.

## Developing a range of awareness, training and guidance materials to target every level of policing

### All police officers and police staff



**Train the trainer events:** A network of 150 learning and development professionals received training how to lead the local delivery of the College of Policing accredited modern slavery general awareness training. Trainer support material is available on NCALT.



**General awareness training:** Materials to support a College of Policing accredited 2.5 hour training session is available on-line. It enables forces to deliver training locally, introducing the Modern Slavery Act and helping police officers and staff to spot the signs of exploitation. Content is available on NCALT.



### Police officers, PCSOs and staff working in frontline response



**Unlocking Slavery Roadshow:** Nine one day conference events were held in various locations across the country to provide frontline response teams with guidance on how to respond in the early stages of MSHT investigations. Materials available on POLKA.



**Initial Actions:** A guidance booklet and officer pocket book "aide-memoire" is available on-line to support frontline officers and other staff on the "golden hour" actions needed in responding to victims or scenes involving MSHT. Content is available on POLKA.



### Force strategic and operational lead practitioners



**Two national CPD events were held** in May 2018 and March 2019 for the senior strategic and operational leads on modern slavery from each force. Delegates received updates on the current threat picture in addition to briefings on the latest progress and priorities in tackling modern slavery. Sessions were led by speakers from police, Home Office, NCA and other partner agencies. Case studies and debriefing updates were featured to promote good practice and share lessons learned.



**Crime registrar CPD:** A one day national conference for crime registrars was held to review changes to the recording of MSHT related crime and incidents from April 2019. The new process, developed by the Home Office National Crime Registrar's office and members of the Programme team will improve accuracy and reduce anomalies in the reporting and recording of MSHT incidents.

### Investigators



**Specialist modern slavery investigator training:** A four-day College of Policing accredited course to develop the ability of front-line investigators to manage modern slavery investigations. The content focuses on safeguarding and support needs of victims and witnesses, how to use a variety of techniques to contribute to the investigation of MSHT related crime, how to disrupt offenders and also to reduce future offending. Investigators are also coached on how to advise colleagues, supervisors and managers on the tactics and complexities of MSHT investigations. The course is currently delivered by the Programme but is in the process of being mainstreamed into force training delivery. Forty eight courses were held up to March 2019. Content and trainer support material is available on NCALT.





**Modern slavery lead investigator CPD:** Twenty two one-day training events were held to upskill lead investigators in the supervision of MSHT cases, with particular emphasis on the use of ABE, covert tactics and victim management. The course is endorsed by the College of Policing.



**Interviewing vulnerable victims CPD:** A series of 11 CPD events were held to support the use of ABE interview techniques in MSHT investigations. The upskill sessions, designed in collaboration with the College of Policing, support ABE trained officer officers in understanding the specific needs and vulnerabilities of MSHT victims.



**International enquiries CPD** – A one day national conference was held in February 2019 for investigators to explore the avenues and opportunities available to support the international aspects of MSHT investigations. Comprehensive guidance on the use of international enquires in modern slavery investigations is also available on-line to police forces and law enforcement agencies.



**Investigative opportunities of adult services websites CPD** - A one day national conference was organised, in collaboration with the National Crime Agency, to share knowledge about how ASWs are used to promote sexual exploitation and the investigative opportunities that these sites present.



### Intelligence analysts and researchers



**Analyst and researcher CPD:** A one day national CPD conference followed by 26 training workshop events held across the country were organised to help members of the intelligence community learn more about exploitation types, victim psychology and offender business models. The course provides analysts and researchers with guidance on approaches to gather and interpret intelligence to tackle modern slavery.

### PCCs, chief constables, chief officers & crime registrars



**PCC and chief officer events:** Two one day conferences were held to update police and crime commissioners, chief constables and chief officers on the threats posed by modern slavery and human trafficking and on the police and community responses required.



**OPCC workshops:** A series of nine nationwide workshop events were held at which PCCs and their teams identified common themes, shared ideas and work to promote good practice in the local response to modern slavery and human trafficking.

### Volunteer Police Cadets



**Encouraging social action** - The latest set of educational materials produced supports the thousands of young people who are involved in Volunteer Police Cadets. Developed in collaboration with the Just Enough Group, these sessions are designed to help young people be better equipped to make choices in their everyday lives that protect themselves and their peers against the effects and causes of modern slavery.



## Specialist skills development – Nationwide Delivery - Continuing positive feedback

- “ A really excellent and informative event delivered with passion and knowledge. I would recommend anyone who deals with risk or threat should attend this, irrespective of thematic responsibility  
**Senior Analyst**
- “ A great course and good to see contributions from a range of partners  
**Investigator**
- “ This was an excellent course – one of best I have received in policing  
**Intelligence Manager**



The development of specialist skills to tackle modern slavery amongst investigators, intelligence teams and force modern slavery leads has been core to improving national policing capability. As part of this members of the Programme team have delivered training and development activity to colleagues from every police force in the UK and to a number of other law enforcement agencies.

#### Intelligence and analysis – Practitioner development

Acting on and sharing intelligence is vital to modern slavery investigation and prevention. Throughout 2018/19, members of the Insight Team and regional analysts delivered 26 one day CPD courses on how to develop and use modern slavery intelligence packages. (See blue dots for locations).

- Feedback from delegates was overwhelmingly positive. 99% of attendees would recommend the course to colleagues.
- Having attended, 95% would describe their modern slavery knowledge as good or excellent rising from 40% before.

- “ With more modern slavery coming to light there’s a greater need for this course than ever. Cases are often complex and need to be investigated competently  
**Investigator**

#### Specialist investigation – Practitioner training

This four day College of Policing accredited course has been run on 48 occasions at 25 locations across the UK (see red dots). Partners from NCA, GLAA, HRMC, DWP and NGOs also participate in its delivery demonstrating the multi-agency approach typically required for MSHT investigations.

- Delegate responses are again overwhelmingly positive. More than 95% of those attending say they now feel more confident in tackling modern slavery cases and better equipped to assist colleagues.
- More than half of those who’ve attended say that their knowledge of modern slavery crime and the approaches required for investigations had been “vastly” improved.



# National Anti-Trafficking and Modern Slavery Network



**Police and crime commissioners (PCCs) are in an ideal position to initiate and co-ordinate local efforts to tackle modern slavery and exploitation.**

In January 2016, Mark Burns-Williamson OBE the PCC for West Yorkshire and national lead for modern slavery and human trafficking, established a network of fellow PCCs with a shared interest in defeating trafficking and exploitation. Since then, members of the National Anti-Trafficking and Modern Slavery Network (NATMSN) have continued to champion efforts that focus on modern slavery at a national and local level.

Supporting the work of PCCs has been a core focus of the Modern Slavery Police Transformation Programme since the outset. As part of the police transformation funding, the NATMSN network is supported with resources to help coordinate regular events and briefings for PCCs and their teams. During 2018/19 up to 22 OPCC teams were represented at the four network meetings held. In these sessions they received updates on the progress of the Programme in addition to specific briefings on:

- NRM reform.
- County lines and child criminal exploitation.
- Trafficked and missing children.
- Section 54 of the Modern Slavery Act and transparency in supply chains.
- Local PCC commissioned victim support services.
- Local Government Association guidance for modern slavery.
- National Crime Agency – Project AIDANT.
- Anti-slavery partnership networks.
- Welsh Government response to modern slavery.

Over the past year, the Programme has run a small grants scheme to support PCCs in their own local engagement and awareness activities and has developed and rolled out a modern slavery good practice toolkit for PCCs.

“ It was so helpful to have the opportunity to have these discussions on a smaller, more regional scale. The informal nature was brilliant and I felt that the challenges modern slavery raises were listened to and taken seriously by the group

OPCC delegate

Delegates at the first PCC Toolkit event in January 2019



In his role as Chair of the Association of Police and Crime Commissioners (APCC) and as the APCC Lead on Modern Slavery, Mark Burns-Williamson continues to engage with a broad range of stakeholders in order to influence better outcomes for victims, in the development of national and local prevention initiatives and in ensuring that sufficient policing resources are made available to target and investigate offences.

## PCC toolkit on tackling modern slavery and human trafficking

A major focus for the NATMSN network in 2018/19 has been to share details of a new toolkit designed to help with the development of local responses to modern slavery. In a series of nine nationwide workshop events to launch the toolkit, PCCs and their teams worked together to identify common themes, share ideas and promote good practice.

Understanding the extent and type of modern slavery in any given area is a vital first step. The next stage involves looking at how police and partner resources are responding to these challenges through collaborative and multi-agency arrangements. For PCCs, placing a direct focus on modern slavery within local police and crime plans is a practical step to ensure that police and partner agencies are accountable for delivery.

The new toolkit provides PCCs with consistent background information on modern slavery and includes case studies illustrating how PCCs have tackled these challenges in their local areas. Information is also included about a wide range of prevention and awareness initiatives; about running targeted communication campaigns, providing training support, working with businesses to tackle modern slavery in supply chains and reaching out directly to vulnerable groups.



# Grant funding to support PCCs to deliver partnership activity

During 2018 the Programme, via NATMSN, has provided a second and third round of small grants to support 34 police and crime commissioners to move forward partnership activity in their area. Partnerships have evolved very differently as a result of local arrangements and this approach was a practical way to identify and share good practice, to help fledgling initiatives overcome initial obstacles and to deliver meaningful local impact. OPCC teams and their local partners were supported by regional coordinators and by NATMSN to identify opportunities to encourage communities and local businesses to take action to protect victims, report their concerns and to get involved in preventing modern slavery.

“ In 2017, many of the Programme’s small grants were used to increase awareness. In 2018, it was notable that many projects were maturing, and more targeted intervention activity was being planned  
**Clare Gollop, Programme Director, Modern Slavery Police Transformation**

The grant themes for 2018 were designed to encourage police and crime commissioners and their partnership networks to protect communities or vulnerable groups against the specific threats that were being identified within regional and local threat profiles, and to reach out to engage local businesses. In many cases, the grant scheme prompted additional local investment.

## Supporting businesses in to play their role in eradicating slavery

Police and crime commissioners, and local police forces, have strong relationships with their local business community. PCCs have used the small grant schemes to reach businesses which operate in sectors where exploitation may be more likely to occur, or where businesses are well placed to identify slavery. This has included: businesses that employ casual or seasonal labour (including agriculture, factories, food production, tourism, hotels & hospitality); daily delivery and home visiting services, recruitment agencies, car washes, restaurants and takeaways, taxi and transport businesses, landlords and lettings management agencies. Amongst the activities supported were local business engagement events, the provision of business training;

the distribution of promotional materials, information packs and on-line resources; and research work to understand the potential for modern slavery within the local business communities.

**Focusing on vulnerable groups:** Engaging with homeless people attending drop-in welfare centres and workers at hand-car washes have been the focus of several initiatives across the country where PCCs have supported activity to communicate directly with groups vulnerable to exploitation. Grant funding has been used to produce information materials and guidance on employment right and benefits , which has been translated into several languages. Hot drinks and food has also been offered at modern slavery advice sessions. NATMSN also supported a partnership conference in October 2018 where over 100 delegates shared good practice in initiatives to prevent the exploitation of homeless people.



**NATMSN supported a partnership conference to raise awareness of the way homeless people can be targeted for recruitment into situations of modern slavery**

**Supporting stronger partnerships:** A common element of all the PCC funding through the Programme has been to encourage closer-working between PCCs and a range of partners. This has included supporting PCCs and police forces to work more closely with modern slavery NGO’s; anti-Slavery partnership networks; government agencies (Department of Work and Pensions and Trading Standards); local business groups such as the local chambers of commerce and local faith and campaign groups such as The Clewer Initiative.

In July 2018 more than 250 delegates attended the Programme’s first National Partnership Conference, held in Birmingham. Opened by Mark Burns Williamson OBE, and supported by NATMSN and the MSPTU, the event showcased successes and shared challenges about how police, NGOs and public sector agencies work together to support victims, gather intelligence and to reduce the potential for modern slavery to take place in local communities. The invaluable role that partners undertake alongside, and in support of the police, was widely recognised in the case studies presented, particularly the leading role played in supporting survivors.

## Initiatives led by police and crime commissioners

### Humberside OPCC: Raising awareness amongst business on Humberside

Humberside OPCC, as part of the Humber Modern Slavery Partnership, hosted an awareness raising seminar in January 2019 aimed at local business communities. Over thirty delegates attended the event held at the Business Hive in North East Lincolnshire and supported with funding by the Modern Slavery Police Transformation Programme. A range of small to medium businesses were represented along with delegates from statutory and voluntary sector agencies.

The Modern Slavery Helpline also supported the event by providing information materials. The seminar featured key speakers from the Wilberforce Institute as well as from the Humber Modern Slavery Partnership. How to spot potential exploitation within supply chains and the importance of sharing community based intelligence were two of the major themes covered. News about the event was featured on several local radio stations and also reached a wide audience on social media.



### West Midlands OPCC: Communicating with potential victims of sexual exploitation who are unable to speak English

Black Country Women's Aid (BCWA) is developing a language toolkit for use with sex workers and potential victims of modern slavery. The initiative is funded by the Modern Slavery Police Transformation Programme and will be made available online for police officers and partner organisations. Its aim is to facilitate the identification of victims and encourage their engagement with the police.

The toolkit is designed to help officers when they encounter sex workers and victims of exploitation, both on the street and in brothels, who speak no, or little, English. Ideally, an interpreter would be present but often this is not possible, and telephone interpreting can be unsatisfactory.



The toolkit provides a way to establish basic information and also to facilitate officers' engagement with clients using culturally appropriate language.

Staff from BCWA accompanied West Midlands Police on visits to brothels to gain an understanding of the kind of information required, and specialist officers are providing policing input. Advice is also being provided by voluntary sector organisations, survivors of modern slavery, sex workers, sexual health professionals, and academics working in the field. The toolkit is set to be made available in Romanian, Albanian, Polish, Vietnamese and Mandarin.

“Survivors of modern slavery are amongst the strongest people you will ever meet, and are well placed to help us understand how to prevent this harm happening to others. It's heartening to see that more of the grant funded projects are involving survivor leaders in shaping their response

Clare Gollop, Programme Director, Modern Slavery Police Transformation Programme

### West Yorkshire OPCC: Front line social workers receive training to help tackle modern slavery

The PCC for West Yorkshire, the anti-slavery charity Hope for Justice and the Association of Directors of Adult Social Services (ADASS) joined forces to deliver modern slavery training to more than 50 social workers working in the Yorkshire and Humber region.

Two events, held in Leeds and Sheffield, provided delegates with comprehensive training on how to spot the signs and indicators of modern slavery and how to respond, especially where victim safeguarding might be required. Each delegate received a 'Responding to Modern Slavery' handbook to take away as well as awareness and promotional materials. The events were extremely well received leading to more requests from local authorities across West Yorkshire and the neighbouring counties for a continued collaborative approach to deliver similar training.



### Devon, Cornwall & The Isles of Scilly OPCC: Collaboration with Trading Standards to spread modern slavery messages across Devon, Somerset and Torbay

To generate wider awareness of the potential for modern slavery within business supply chains, the Devon and Cornwall OPCC has commissioned a pilot project with local Trading Standards teams to include modern slavery criteria within their existing Buy With Confidence scheme (BWC).

BWC accredited businesses are only allowed to carry the BWC logo endorsement once they have made clear and visible commitment to providing excellent standards of customer service and legal compliance. Accreditation is professionally audited by Trading Standards officers so that consumers can be confident in the quality of products and services they choose to buy from the scheme's members.

Within the Devon, Somerset and Torbay trading standards areas included in the pilot, accreditation within BWC will soon also include a requirement to sign-up to modern slavery criteria. These criteria are designed to ensure that the business operations and supply chains of member businesses are free of modern slavery or labour exploitation, thereby providing an additional level of confidence for consumers.

Trading Standards officers have already received training on how to include the new criteria as part of regular audits and of how to spot the signs of exploitation. Communications with existing BWC scheme members and the wider business community is also underway. This will soon include a training video and other on-line resources made available to help new and existing BWC members ensure that their products and services are exploitation free.



Trading Standards officers receive training on the new modern slavery criteria within the BWC scheme



“It is essential that front line adult social care workers can spot the signs and indicators of different types of modern slavery in the daily duties. This collaborative partnership approach in helping to increase awareness and equip social workers with those skills

Cath Roff, Regional Chair ADASS Yorkshire & Humber





# Border Force

## Keeping modern slavery at the core of Border Force operations

Maintaining a high level of vigilance for indicators of modern slavery is central to everyday operations at Border Force. Raising awareness of the threat within the travel industry and the travelling public is also high on the agenda.

All Border Force frontline staff receive regular training in how to spot perpetrators and support victims as they cross the UK border. They are supported by specialist Border Force safeguarding and modern slavery officers whose key goal is to protect vulnerable people and target the organised criminal groups that seek to traffic and exploit them. This dedication has seen four members of this specialist team recognised for their personal contribution in preventing modern slavery with public Honours Lists awards made over the last two years.

In recognition of the role key stakeholders can play in combating modern slavery, Border Force has shared training and support materials with airlines, ferry and rail carriers as well as port operators and

travel companies. This material teaches employees about indicators of modern slavery and how to report concerns about people who could be subject to trafficking and exploitation. This has paid dividends with fast time referrals and interventions at the UK border.

Communicating the Border Force approach to modern slavery with other governments and law enforcement agencies is also part of the role. Good practice study exchanges, training sessions and presentations enable Border Force staff to share their experience with a wider audience.

Year round engagement activity to raise public awareness of modern slavery and to promote the Modern Slavery Helpline is a regular feature at UK ports of entry. Poster campaigns and information stands, and other additional activities, to mark annual days of action are core to this strategy. In 2018, Border Force marked the UK's national Anti-Slavery Day on 18th October with events at more than a dozen major train stations, airports and ports working in close collaboration with partners including British Transport Police, local police forces and NGOs.



Can you see me? – Modern slavery posters featuring the Modern Slavery Helpline number are displayed prominently at UK ports and airports

Border Force is also an active participant in the Project AIDANT intensification weeks led by the National Crime Agency. This is supported by Border Force intelligence teams who have access to the modern slavery and Project AIDANT specific briefing materials provided by JSTAC and the MSPTU teams. During 2018, 54 potential victims of modern slavery were identified by Border Force as a direct result of activity connected to Project AIDANT.

“ The enthusiasm and commitment shown by Border Force staff in their operational response to modern slavery and involvement in Project AIDANT has been truly inspiring. Project AIDANT was designed to help embed the principles and knowledge needed to make the response to modern slavery and human trafficking part of everyday business. It has helped the team to keep this work at the core of Border Force operations  
**Amanda Read, Border Force National Lead for Safeguarding and Modern Slavery.**





## Crown Prosecution Service

**During 2018, the number of modern slavery offences charged and prosecuted by the CPS was the highest it has ever been – at 399. In addition to the steady increase in case referrals from the police for charge and prosecution, there has been a significant increase in matters referred for early investigative advice.**

This is vital in ensuring strong cases are built through police and prosecutors working together from the outset. In these cases, there is frequently less or even no reliance upon the victim's testimony. The conviction rate remained at 65% which is within the average expected by the CPS. There was also a marked increase in the average number of victims giving evidence and being supported at court which is reflective of the greater complexity of these cases, and contributes to an increase in the length of time that trials take.

### “County Lines” child criminal exploitation cases

The nature of modern slavery casework is also changing, with greater numbers of British minors identified as victims. The NRM data shows UK minors to be the fastest growing referral group predominantly for criminal exploitation for drug offences. This is now far higher than for other nationalities, for example Vietnamese minors who previously were the most exploited youths for drug offences.

### Challenges in 2018/19 – Volume of digital evidence

The CPS has seen a changing profile of evidence in modern slavery casework as a result of the move to digital devices and on-line sites used to recruit and exploit victims. This can provide a useful source of evidence to support prosecutions and remove the burden from the victim, but can also lead to significant volumes of material, adding to the length of investigation.



**Three gang members convicted of human trafficking offences**

### Victimless prosecution for modern slavery offences: County lines R v KWA

In April 2019, three gang members from London were convicted of human trafficking offences after they used young and vulnerable people from London to transport and sell drugs in Hampshire. This is the first county lines case where defendants were convicted after trial; they will be sentenced later in May 2019. The first trial was terminated by the trial judge for a number of reasons, including that none of the victims gave evidence. The CPS appealed the terminatory ruling. The Court of Appeal considered the interpretation of the trafficking offence and held that a prosecution for this offence does not depend upon the ability to call the individuals said to have been exploited or the target of exploitation and the prosecution does not have to prove that the victim was chosen solely because of their youth and that a person without youth would be likely to refuse. None of the child couriers attended court to give evidence. Instead, a police expert witness gave evidence explaining how a county drug line works and the advantages of using child couriers. The Court ordered a re-trial and the defendants were subsequently convicted. The judgment assists investigators and prosecutors in using the MSA in these cases.

The explosion in both the capacity and use of digital technology has brought significant challenges to investigators and prosecutors in meeting their disclosure obligations, particularly where different languages are used and material has to be translated before it can be reviewed.

### Section 45

Following a high court judgment last year which determined how the statutory defence (Section 45) should operate the CPS has worked closely with the MSPTU team to ensure that the Section 45 defence operates in such a way as to strike the correct balance between protecting genuine victims and preventing its potential abuse. The CPS has ensured legal guidance on Section 45 is updated to reflect a growing number of case judgments during the year. A number of short training courses for prosecutors, a training resource pack for CPS Area legal leads and training to the London youth magistrates and YOT teams have also been delivered. The DPP is also recording a podcast to be published on the CPS Infonet shortly on the application of the Section 45 defence.

### International cooperation

The CPS is currently participating in 22 live joint investigations on modern slavery, all of which involve EU member states (currently six countries). Joint Investigation Teams (JITs) are the most effective way of investigating and prosecuting cases where traffickers operate across jurisdictions to recruit, transport and exploit their victims in different countries. The CPS together with the Metropolitan Police, supported by the MSPTU have now delivered two joint MS JIT information events to law enforcement and prosecutors. But with an eye to the possibility of a no deal departure from the EU, the basis of these JITs has been renegotiated. The International Joint Investigation Teams (International Agreements) (EU Exit) Order 2019 came into force on the 29 March 2019. This provides a further legal basis for establishing JITs outside the EU tools and was not dependent on Brexit outcomes.

### Looking ahead

It is important to continually review existing legislation and offences to ensure that they are relevant and applicable to the changing profile of modern slavery offences. During the last year the government has undertaken a review of the MSA and a Home Affairs Select Committee on modern slavery to enquire into the effectiveness of our collective response. The CPS believes that the offences under the MSA are sufficiently clear and broad ranging to respond to

different types of offending and exploitation types. Often the challenges are less about the legislation and more to do with the evidence available from a range of sources. In response the CPS is now increasingly making innovative use of the MSA to bring prosecutions. Over the last year this has included the following examples:

- A case brought against a man who abused children and vulnerable adults online across the world in sexual activities and controlled their lives (sentenced to 38 years' imprisonment).
- Three county lines cases (two cases have been sentenced to imprisonment of 14, ten and nine years).
- Prosecution of the first case where the extra territorial provisions were applied, involving victims trafficked from Nigeria to Germany by a British citizen. In this case Josephine Iyamu was convicted after trial of five offences of human trafficking for sexual exploitation and perverting the course of justice for which she was sentenced to a total of 18 years imprisonment. This followed an appeal against an earlier 14 year sentence which was thought to be too lenient. The case is described in the NCA section (on page 46).

### Working with policing to increase knowledge, awareness and understanding of the Modern Slavery Act

The CPS has delivered a number of follow-up face-to-face training sessions on modern slavery to CPS Area prosecutors. Further joint training events with the Metropolitan Police Service on modern slavery JITs was also organised for law enforcement officers and prosecutors across the UK. The CPS also contributes to training and guidance activity across a large number of police force areas, police force solicitors, magistrates and youth magistrates, Law Society and Youth Offender Teams, which has also covered application of the statutory defence.



# Gangmasters & Labour Abuse Authority

## Working together to crack down on illegal working practices and to raise awareness of modern slavery.

The GLAA is the foremost investigative agency for modern slavery and labour exploitation in the UK. Its role is to work in partnership with police and other law enforcement agencies to protect vulnerable and exploited workers.

In April 2017, the authority was granted powers under the Police and Criminal Evidence Act 1984 to investigate labour abuse across all aspects of the UK labour market.

The organisation operates a licensing scheme regulating businesses who supply workers to agriculture, horticulture, shellfish gathering, and food processing and packaging. Its licensing standards cover health and safety, pay, transport and accommodation. It also checks that tax, National Insurance and VAT regulations are met.

The GLAA investigates any circumstances where there is a risk of worker exploitation or other crime by gathering intelligence and working with police,

government departments and other enforcement agencies to target, dismantle and disrupt serious and organised crime in sectors such as construction, hospitality, warehousing and car washes.

Since acquiring its new powers, the agency has made 166 arrests and identified more than 3,700 workers suffering some form of abuse. Almost 120 potential victims have been accepted into the government's National Referral Mechanism (NRM).

A total of 260 criminal investigations have been started, with 121 ongoing. The authority currently has 16 active Labour Market Enforcement Undertakings (LMEUs) and one Labour Market Enforcement Order (LMEO) in place. GLAA investigators have also identified non-payment of holiday pay totalling £245,000 and £153,000 of withheld wages.

Compliance activity has increased, with 220 inspections carried out and more than 200 potential breaches of the licensing standards identified. In the last year, the GLAA also revoked 22 licences and refused a further 13.

“ As an organisation, we are aware that we cannot simply arrest our way out of the problem of modern slavery. Bringing businesses to the table to raise standards and promote good working practices has to be part of a long-term preventative plan to eradicate labour exploitation

**Darryl Dixon, Director of Strategy, GLAA**

“ There are thousands of people being exploited for their labour across the UK, many of whom will have been trafficked and forced to live in deeply unpleasant conditions for little or no pay. Our number one priority is to protect vulnerable workers and the best way to achieve this is by working together to crack down on illegal practices and raising public awareness of modern slavery to drive real consumer change

**Ian Waterfield, Director of Operations, GLAA**



## GLAA interventions using new powers

- Investigators rescued victims in Cumbria and Hampshire who were believed to have been kept in sheds for 40 years and three years respectively. Arrests for offences under the Modern Slavery Act were made and both cases are progressing.
- The GLAA continues to develop its protocols in construction and textiles, the latter announced by the Prime Minister via the Implementation Task Force. The agency has also backed the Responsible Car Wash Scheme (RCWS) designed to tackle modern slavery and non-compliance within the hand car wash industry.
- A man and woman were handed the UK's first Labour Market Enforcement Order after pleading guilty to supplying workers to food factories in Leicester without a licence.
- Four people were convicted of gangmaster offences in Northern Ireland. A Romanian man was jailed for three months for supplying workers into the agricultural, food processing and packaging sectors without a licence. Three Lithuanian men were also fined for illegally employing workers to pick shellfish across the country.



# HM Revenue & Customs

## **A key role in providing intelligence, in supporting law enforcement interventions and in increasing awareness of employment rights and responsibilities.**

HMRC is committed to playing its part in the fight to end the human suffering and misery caused by modern slavery. Since the publication of last year's Modern Slavery Police Transformation Programme annual report, HMRC has continued to use its wide ranging powers to tackle criminals who seek to make a profit from this heinous crime.

HMRC has concluded 191 cases of tax non-compliance or fraud linked to modern slavery or exploitation in 2018/19, securing nearly £8m for the UK's vital public services. More importantly, HMRC continues to help lift vulnerable individuals out of modern slavery and to bring criminals responsible to justice.

### **Identifying behaviours linked to modern slavery and exploitation**

HMRC's oversight of the UK tax system means it is uniquely placed to identify behaviours linked to labour exploitation, modern slavery and further criminality. This includes spotting those who use exploitative employment practices or the hidden economy to carry out tax fraud to uncovering abuse of the tax credit system and breaches of National Minimum Wage (NMW) legislation.

### **Value of intelligence**

HMRC has an important role to play in helping to build the intelligence picture around modern slavery and will focus its efforts in the coming year on using HMRC intelligence and data to help target interventions by police forces, the NCA and the Home Office. Alongside partners, HMRC recognises that joint working is vital in tackling the injustice and harm of modern slavery.

In the last year, HMRC has worked to strengthen these important relationships, collaborating with partners across the UK on a range of intelligence development and operational activity. This includes taking part in weeks of action against modern slavery as part of the long-running NCA-led Project AIDANT.

HMRC is also a key partner in the Sussex Police-led Op DISCOVERY – a multi-agency approach to tackling modern slavery in the Hastings and Rother areas that has resulted in a greater flow of intelligence between partners and fines for companies found to be in breach of NMW legislation. HMRC has also begun work on a data-led project to identify Houses of Multiple Occupancy and the businesses linked to them, which could present joint working opportunities.

### **Tackling non-compliance with National Minimum Wage legislation**

Meanwhile, four new NMW teams have been deployed to tackle serious non-compliance with the legislation. Last year, they carried out 190 joint visits with colleagues from the Gangmasters and Labour Abuse Authority, the Employment Agency Standards Inspectorate, the Home Office and the police, targeting poultry farming, the textiles industry and employers of migrant workers. HMRC also supported police prosecutions by sourcing witness statements detailing what workers have been paid.

### **Training and education**

Training and capability building are also important in enhancing the UK response to modern slavery. Accordingly, HMRC has contributed to training initiatives with partners to help them understand what expertise HMRC can bring to the table in the fight against the enslavers. The simple fact is the information held by HMRC can be vital in building a fuller picture of the slavers' activity, and through legal gateways is able to share that information, helping partners bring offenders to justice.

HMRC has also taken part in activity to educate employers and workers about their obligations and entitlements under NMW, and have been a key partner in the Responsible Car Wash Scheme, ensuring that those who run these businesses know what their responsibilities are as a taxpayer and employer.

Over the last 12 months, HMRC has also provided insight and contributed to the Independent Review of the Modern Slavery Act and a call for evidence to support the Labour Market Enforcement 2019/20 strategy – both important steps to ensure that the UK remains at the forefront of the fight against modern slavery.

Looking ahead, HMRC is determined to further ramp up its efforts, and will continue to work with trusted partners to help take the fight to the criminals who trade in the human suffering and misery caused by modern slavery.

“HMRC continues to be determined to increase and focus its efforts to tackle modern slavery working with a range of partners to help take the fight to the criminals who trade in the human suffering and misery





# Department for Work & Pensions

## Helping law enforcement agencies uncover cases of exploitation

The DWP's Serious and Organised Crime (SOC) teams have for many years been involved in the investigation of modern slavery and human trafficking where fraudulent claims and abuse of the benefits system are present. With an increasing national focus in this area, DWP has been a key partner with other law enforcement agencies in seeking to protect vulnerable victims as well as investigate and prosecute offenders.

DWP has also committed to identify and refer potential MSHT victims to agencies able to support them at the earliest opportunity. This includes supporting referrals to the NRM as well as providing support in the rehabilitation of victims; for example, in the provision of national insurance numbers, or providing help to find accommodation and employment.

The DWP is developing a serious and organised crime strategy that will consider how it prioritises MSHT offences in both sharing intelligence and investigating offences linked to benefit fraud. New initiatives include the launch of an internal e-mail alert system to allow all staff to be able to report suspicions of MSHT, either through work or personal contacts. Since inception in March 2017, over 198 referrals have been received and intelligence shared with other LEAs and agencies. In addition, all DWP front line staff have received MSHT awareness training to ensure any concerns are reported as they arise from the personal contact that DWP teams have in dealing with customers.

The DWP has almost 200 MSHT operations either underway as live investigations, or in development, all of which will involve collaboration with LEA partners. DWP teams also regularly contribute to Project AIDANT and other joint activities, often playing a key role in helping to uncover cases of exploitation.

“ DWP team members are proud of the collaboration work conducted with LEAs and outside agencies to get justice for victims of MSHT. Recent investment in intelligence sharing and staff awareness demonstrates that commitment



### Examples include:

- Support for a police led operation where DWP investigators identified 43 potential victims of trafficking linked to an organised crime group, 13 of whom were rescued on the resulting multi-agency day of action.
- Work with West Midlands Police on an operation that resulted in the 11 potential victims being able to leave the exploitative situation.
- Collaboration with police, NCA and CPS and overseas authorities on Joint Investigation Teams.
- Providing specialist DWP investigator and analyst resources to support geographically focussed multi-agency programmes.



# Immigration Enforcement

## Working with policing and partners on targeted projects

Immigration Enforcement (IE) works with a range of partners including the Independent Anti-Slavery Commissioner's office, NCA, police, CPS, local authorities and the voluntary sector to identify and protect victims of modern slavery and to bring perpetrators to justice. Utilising its' local, regional and international presence, IE helps the UK and its' agencies intervene against the trafficking of people by criminal networks wherever this is possible.

## Operation INNERSTE – Tracing unaccompanied migrant children

Operation INNERSTE is a multi-agency response to the initial encounter of unaccompanied migrant children suspected of clandestinely entering the UK via a lorry-drop. It requires the first responder to engage in conversation with the child to build early rapport. The approach provides the child with a safe environment to express their needs and concerns, and the opportunity for authorities to explain the support, services and protection entitled to them.

The creation of a relationship of trust between the first responder and the child is intended to reduce the influence of traffickers and prevent them from absconding or going missing. As part of the process, the first responder completes a welfare form, obtains fingerprints and a photograph to be uploaded on to immigration systems. Capturing this information legally allows the police and immigration departments to identify children later if they go missing, commit

crime, are trafficked or are found in further situations of vulnerability.

The project is being rolled out in three phases and will reach all police forces in England and Wales by the conclusion of the third phase in 2020.

## Labour exploitation in the off-shore fishing industry

In conjunction with Police Scotland, Cumbria Police and Hampshire Police, IE teams have investigated allegations into labour exploitation of crew on board fishing vessels off the North West coast of the UK. Interventions have seen vessels boarded, welfare checks on crew conducted and potential victims identified who have been entered the NRM. Further evidence has also been gathered in connection to on-going investigations into the labour exploitation in the fishing industry.

## Overseas domestic workers (ODWs)

Working in collaboration with police forces nationwide, IE has led in tackling the emerging issue of the exploitation of ODWs who have entered the UK. Over 300 welfare and compliance visits have been conducted nationally with an emphasis on ensuring the terms of the visas were being adhered to, and also to establish the safety, security and wellbeing of the visa holders. One potential victim has been identified so far and there have been a number of successful outcomes regarding abuse of visa conditions. Further compliance visits will be run across the country during 2019/20 as part of continuing activity in this area.

## Project AIDANT – Support for multi-agency intensification

Since Project AIDANT's inception in 2017 IE has strived to support partner agencies and also led on many of the themed intensifications both inland and at the border. Investigations teams within IE continue to work closely with police across the UK, the NCA, GLAA, HMRC and all ROCU areas to achieve shared goals. This support will continue this year with further operations planned.

**The National Crime Agency is at the centre of supporting the national law enforcement response to modern slavery.**

Over the last year, the National Crime Agency (NCA) has continued to lead the UK's fight against serious and organised crime (SOC), including modern slavery and human trafficking. It is responsible for securing an effective and efficient law enforcement response, for building an authoritative intelligence picture and for bringing law enforcement agencies together. Modern slavery has remained one of the top SOC priorities for the NCA and law enforcement this year.

The NCA Modern Slavery and Human Trafficking Unit (MSHTU) has continued to lead and support the UK law enforcement response to modern slavery using the full range of the NCA's specialist capabilities. The NCA's National Modern Slavery Tactical Advisers received over 560 requests for support and assistance during 2018/19

and have worked with partners in the UK and abroad to share best practice on conducting complex victim-focused investigations.

A central role is also delivered through the National Threat Group which is chaired on behalf of the NCA by Chief Constable Shaun Sawyer. This multi-agency forum ensures that all partners connected to law enforcement share a common view of modern slavery and the related exploitation types, of how the offending works and of how the agencies, including police forces, can work together to tackle it.

**Project AIDANT**

A powerful example of the positive effect of working together is the series of NCA led multi-agency operational intensifications designed to tackle and draw attention to the different forms modern slavery. During 2017/19 all police forces took part, along with other law enforcement agencies including the Gangmasters

**Operation REDROOT**

In June 2018, Josephine Iyamu was the first UK national to be convicted in the UK of trafficking offences that took place overseas, following an extensive NCA investigation alongside international law enforcement partners. Iyamu was the ringleader of a network that trafficked young Nigerian women to Europe and forced them into prostitution.

Iyamu had arranged for the women to travel from Nigeria to Germany promising them a better life in Europe, charging them 30-38 thousand euros and making them repay their debt through working as prostitutes. The victims were forced to undertake an oath at a voodoo ceremony to cement Iyamu's control over them.

Close partnership working between the NCA, CPS, NAPTIP in Nigeria and German law enforcement secured this important conviction. Iyamu was sentenced to 18 years imprisonment for the offences.



“ Part of our role lies in making sure that all law enforcement partners in fighting modern slavery are on the same page and pulling in the same direction. The Modern Slavery Police Transformation Programme has made a major contribution to that and I am proud of the way we've work together with partners to build momentum and collaboration on this  
**Adam Thompson, National Crime Agency**

and Labour Abuse Authority, Immigration Enforcement, Border Force, Europol, DWP, HMRC and Regional Organised Crime Units. Activities under Project AIDANT were also supported by NGOs, Local Authorities and Fire and Rescue Services in some areas.

Fifteen phases of AIDANT had been organised up to end of March 2019 with each focusing on a specific exploitation type. Across the UK, more than 660 arrests and in excess of 1,040 potential victims were identified as a direct result of activities connected to AIDANT. As well as acting as a call to investigation and enforcement action, the design of also helped to raise awareness of the range of offending and nature of victims within modern slavery.

The JSTAC, Insight and regional teams within the Modern Slavery Police Transformation Programme made a significant contribution to the success of these activities.

**International cooperation**

The NCA leads the UK's international law enforcement engagement on modern slavery and human trafficking with its network of liaison officers posted in key countries. The NCA has chaired the Europol Trafficking in Human Beings Group, as well as leading on pan-EU activity to tackle labour exploitation, child trafficking and use of the internet by traffickers.

In addition, the NCA has continued to work closely with international law enforcement partners on both specific operations such as Operation REDROOT (see case study) and to share our expertise to build the capability of law enforcement partners overseas such as with the Nigerian Agency for the Prevention of Trafficking in Persons (NAPTIP) to support the training and mentoring of the Joint Border Task Force (JBTF).

To support the greater use of international investigations, part of the transformation programme funding was

invested into providing resources to Europol to assist in the coordination of international enquiries generated by UK police forces. Further resources were committed to promoting international investigation within UK policing and highlighting the support that NCA teams can offer where modern slavery investigations have an international footprint.

**Preventing and investigating modern slavery through partnerships**

The NCA works closely with a wide range of partners to prevent as well as detect and investigate modern slavery. Partnership with NGOs improves the NCA's understanding of modern slavery and provides better support for victims. The NCA has also worked closely with academics to share knowledge and fill key research gaps. Most importantly, the NCA works intensively to raise public awareness of modern slavery and how to report it. For example, over the last year the NCA's 'Invisible People' exhibition, which documents the signs of modern slavery, has continued to travel across the UK and has been shown internationally.

NCA partnerships also extend to the private sector and include the Joint Money Laundering Intelligence Taskforce (JMLIT) managed by the National Economic Crime Centre. Through close working with the financial sector, the NCA provides a gateway for investigators to identify new leads and promote opportunities to prevent traffickers being able to launder the proceeds of their crimes through the UK financial industry.



# WHO CAN YOU TELL?

IF YOU NEED HELP, OR YOU THINK SOMEONE MAY BE  
A VICTIM OF SLAVERY OR EXPLOITATION, CALL THE  
CONFIDENTIAL UK MODERN SLAVERY HELPLINE  
24 HOURS A DAY, 365 DAYS A YEAR.

**CALL 08000 121 700**



WORKING TOWARDS  
A WORLD WITHOUT SLAVERY

DOWNLOAD THE FREE UNSEEN APP TO SPOT THE SIGNS OF MODERN SLAVERY AND  
REPORT CONCERNS TO THE MODERN SLAVERY HELPLINE AT THE CLICK OF A BUTTON