



Dame Sara Thornton DBE QPM
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10 February 2020

Rt Honourable Kit Malthouse MP
Minister of State for Crime, Policing and the Fire Service
House of Commons
London
SW1A 0AA

Dear Minister,

In October 2019 I wrote to the chief constables of the 43 police forces in England and Wales to express concern that the number of offenders being referred to the Crown Prosecution Service (CPS) for modern slavery and human trafficking (MSHT) offences had fallen in 2018. I feared that this reduction could potentially lead to fewer prosecutions and convictions under the Modern Slavery Act. If offenders think that there is a very low risk of prosecution, then they are not deterred from committing what is essentially an economic crime – estimated to be worth \$150bn a year by the International Labour Organisation.

Many of the those who exploit children as part of county lines are committing offences under the Modern Slavery Act, and we need to see more charged under that act rather than opting for easier to prove but less appropriate offences under the Misuse of Drugs Act.

In the last few days I have received the prosecution data for 2019 and while the numbers of defendants charged, prosecuted and convicted have risen a little the numbers remain low compared to the number of crimes recorded.

	Recorded Crimes	Suspects charged	Defendants prosecuted	Defendants convicted
2018	3723	172	294	191
2019	5019*	226	349	251

**Figures Jan-Sept 19*

All 43 chief constables replied to my letter and the attached report summarises their replies. Over the last few years forces have developed their response to modern slavery and human trafficking. The level of operational activity has increased but the number of prosecutions has only been rising modestly. I am aware that this reflects broader issues in policing but with the increased resourcing you have promised there is a great opportunity to ensure that more traffickers are brought to justice.

I would make the following observations in respect of both the letters that I have received and my broader engagement with law enforcement:

- I remain concerned that the complex organised nature of modern slavery is still not reflected in the structures and operational arrangements of forces. For an offence which is not constrained by borders or jurisdictions, it remains that the lack of consistency across forces

can make communication and intelligence sharing a challenge. I would hope that the current review of serious and organised crime will develop more effective co-ordination and collaboration across forces.

- While the use of ancillary orders has increased which is welcome, there is a need to develop arrangements to enforce the orders and to store them nationally so that they are available to all forces. There is no point having a Modern Slavery Risk Order if no-one knows about it and it is not enforced.
- The Modern Slavery Police Transformation Unit has provided good guidance and excellent training over the last few years. While the College of Policing has agreed to take over this responsibility, I am concerned to ensure that adequate knowledgeable resources are available.
- The complexity of modern slavery cases requires adequate investment from chief constables. Police officers should not be afraid of uncovering serious crime due to concerns about lack of resources to investigate it.

I would appreciate the opportunity to meet with you to discuss my findings and to seek your support.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ian Yuen', written in a cursive style.

Independent Anti-Slavery Commissioner