

Dame Sara Thornton DBE QPM
Independent Anti-Slavery Commissioner

Dame Vera Baird QC
Victims' Commissioner for England and Wales

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27 October 2021

Rachel Maclean MP
Parliamentary Under Secretary of State (Minister for Safeguarding)
2 Marsham Street
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By email: PS.RachelMaclean@homeoffice.gov.uk

Dear Minister,

The hidden victims: Report on Hestia's super-complaint on the police response to victims of modern slavery

We write in relation to the report on Hestia's super-complaint on the police response to victims of modern slavery¹, jointly published in May 2021 by Her Majesty's Inspectorate of Constabularies, the College of Policing, and the Independent Office for Police Conduct.

This report contained a recommendation for the Home Office to consult with chief constables, the Independent Anti-Slavery Commissioner, Victims' Commissioners, the Crown Prosecution Service, voluntary sector organisations and others, in order to i) better understand the victim experience of the police, and wider enforcement agencies responses to modern slavery and ii) assess the extent and nature of poor victim experiences to understand and identify how they can be improved. It also recommended that this work should result in recommendations for specific actions to further improve victims' experiences, and that the Home Office should publish their findings.

We have recently contacted Home Office officials for an update on progress in relation to this recommendation. They informed us that this work is being captured under existing work streams and the commitments announced under the New Plan for Immigration, including the update to the national Modern Slavery Strategy and efforts to improve support for victims within the criminal justice system. We understand that the Home Office is required to provide a progress update to HMICFRS within six months of the report being published.

Bringing perpetrators to justice is a crucial part of the UK's response to tackling modern slavery. Despite police activity continuing to grow over the past year, prosecutions remain low.² There are a

¹ Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services, the College of Policing and the Independent Office for Police Conduct (2021), '[The hidden victims: Report on Hestia's super-complaint on the police response to victims of modern slavery](#)'.

² Independent Anti-Slavery Commissioner (2021), '[Independent Anti-Slavery Commissioner Annual Report 2020-2021](#)'.

variety of factors contributing to this picture, however it is recognised that the provision of effective support and the opportunity to build rapport with law enforcement can be crucial in maintaining the engagement of victims and survivors within criminal investigations. The recent evaluation of the Justice in Care victim navigator role identified that 87% of victims supported by the navigators engaged with police investigations, compared to 33% nationally.³ While there have been efforts to encourage a greater focus on evidence-led prosecutions, victim testimony remains extremely powerful. We agree that developing a better understanding of the experiences of victims and survivors in their contact with law enforcement, and how this can be improved, is a crucial piece of work to assist in protecting victims and preventing further harm, as well as increasing prosecutions under the Modern Slavery Act 2015.

We are aware that this six-month timescale for providing this update is fast approaching, and so we write to you to formally offer our support in progressing this important work.

We look forward to receiving your response. In the interests of transparency, we request that you respond in a way that enables us to publish your letter on our websites.

Yours sincerely,



Dame Sara Thornton, DBE QPM
Independent Anti-Slavery Commissioner



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³Justice and Care (2021), 'From victim, to witness, to survivor: The Modern Slavery Victim Navigator Programme – An independent analysis'



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9 December 2021

Dear Dame Sara Thornton and Dame Vera Baird,

The Hidden victims: report on Hestia's super-complaint on the police response to victims of modern slavery

Thank you for your letter of 27 October 2021, about Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) report and recommendations following Hestia's super-complaint into the police response to victims of modern slavery.

I welcome the report and its recommendations, and my officials will respond to HMICFRS in due course.

Modern slavery is a deplorable crime, which has a devastating and traumatic impact on victims and we have set out our continued commitment to tackle this crime through the New Plan for Immigration (NPI) and the Beating Crime Plan, both published this year. Disrupting offenders to bring perpetrators to justice and the transformation of our victim identification and support system to ensure victims receive the support they need, to help rebuild their lives, are a key part of the response to that commitment.

As you know, the Home Office has invested £15m since October 2016 to support the police to develop bespoke capability for forces, which has made a real step change in how the police understand and deal with threat of modern slavery.

The increase in live police investigations since the Modern Slavery and Organised Immigration Crime Unit (MSOICU) (formerly the Modern Slavery Police Transformation Unit) was established, from 188 in December 2016 to 3869 in October 2021, and subsequent increases in police recoded modern slavery offences, referrals to the CPS and completed modern slavery prosecutions (with the exception of 2020, due to the closure of the courts during the Covid-19 pandemic) are all testament to police efforts to improve the response since the first HMICFRS inspection on modern slavery in 2017.

The identification and safety of a victim should always be paramount in any law enforcement action. Victims of modern slavery should always be treated with sensitivity and feel safe at the hands of the police. However, I know that some victims can be fearful of law enforcement due to the coercive control they have experienced at the hands of their

exploiters and as a result, victims will often be unaware of the support that law enforcement can facilitate, as well as the wider support they may be entitled to. Through the MSOICU, the Home Office has made funding available to provide specialist training for police victim liaison officers to build trust with victims to facilitate positive engagement with the criminal justice process, using a victim-centred approach.

However, I recognise that there is more to do to ensure consistency in the response to victims across forces and to drive up prosecutions – and that is why in the NPI we committed to continuing to strengthen the criminal justice response with a key focus on ensuring that victims of modern slavery receive the support they need to engage in the criminal justice system (CJS) to ensure that perpetrators face justice, which includes exploring specialist support approaches.

Work is underway to evaluate existing support models within some police forces (such as victim navigators and other NGO-led models). We have also established a specific grant fund for this financial year, enabling police forces and the Gangmasters and Labour Abuse Authority to bid for resources to develop measures to help adult victims of modern slavery engage with the CJS, to identify and fill gaps in support, and to test the effectiveness of different support measures. The grant fund was launched in October and recently closed. Further details of successful projects under this fund will be made available in due course.

I welcome your offer of support to progress work on Recommendation One of the HMICFRS report and my officials will make contact with your offices to discuss this.

A handwritten signature in black ink, appearing to read 'Rachel Maclean', followed by a period.

Rachel Maclean MP
Minister for Safeguarding