

21 January 2022

Sadiq Khan  
Mayor of London  
Mayor's Office for Policing and Crime  
City Hall  
The Queen's Walk  
London  
SE1 2AA

By email: [consultation@mopac.london.gov.uk](mailto:consultation@mopac.london.gov.uk)

Dear Sadiq,

I write to you as the Independent Anti-Slavery Commissioner in response to the consultation on your Police and Crime Plan 2021-2025. In March 2021 I was pleased to hear that the Anti-Slavery London Working Group had secured from five of the London Mayoral Candidates, including yourself, a commitment to prioritising modern slavery if elected which included delivering a dedicated strategy to tackling modern slavery and exploitation in London.<sup>1</sup> I am disappointed that a dedicated strategy has not come to fruition, therefore am keen to ensure that the Police and Crime Plan 2021-2025 appropriately reflects the work that is needed in London to respond to modern slavery and support victims and survivors of this heinous crime.

The draft plan highlights four key areas for action: reducing and preventing violence; increasing trust and building confidence; better supporting victims; and protecting people from exploitation and harm. These are important areas and I believe are all highly relevant in relation to modern slavery. I welcome the commitments within the draft plan that specifically refer to modern slavery such as multi-agency work to safeguard young people who are being criminally exploited and to disrupt organised crime groups, as well as supporting the work of the Metropolitan Police Service to publish a Child Exploitation London Protocol. However, I would like to see more explicit reference to the other forms of modern slavery impacting adults and children in addition to criminal exploitation, for example domestic servitude which we know is occurring in London. It is essential that as a sector we are listening to the voices of survivors, therefore I am supportive of the work that the Victims' Commissioner for London will be doing to better understand victims' experience of the police response to modern slavery and how it can be improved.

I was pleased to see that the draft plan includes reference to a public health approach to preventing violence. Last year my office worked in collaboration with the University of Sheffield and Public Health England to produce a refined framework for a public health approach to modern slavery

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<sup>1</sup> Human Trafficking Foundation (2021), ['London Mayoral Candidates Pledge to Prioritise Modern Slavery'](#).

including a guide for anti-slavery partnerships.<sup>2</sup> Prevention is vital if we are to break the cycle of violence and exploitation, as is working in partnership with a wide range of organisations to offer timely and effective interventions, and so I am encouraged by this work.

Within the draft plan, I welcome the commitment from City Hall to work with partners to embed a trauma-informed approach to those at risk of exploitation. I would however encourage that further consideration is given to the support that is available to victims and survivors of modern slavery in London. In May 2021, Her Majesty's Inspectorate of Constabularies, Fire and Rescue Services (HMICFRS), the College of Policing and the Independent Office for Police Conduct (IOPC) published their report of findings following the Super Complaint made by Hestia raising concerns about the police response to victims of modern slavery. Recommendation four of this report was for chief constables and Police and Crime Commissioners (PCCs) to work together to ensure appropriate support to augment the national support provision, focussing on what should be available before and after an National Referral Mechanism (NRM) referral, as well as an alternative provision for those declining a referral.<sup>3</sup>

There are many examples of encouraging practice involving Police and Crime Commissioners across the UK in relation to both victim support and wider partnership activity. For example, the West Midlands OPCC funded a Slavery and Trafficking Victim Safeguarding Pathways Coordinator in 2020/2021 and Hampshire OPCC hosts a Modern Slavery County Co-ordinator who has played a central role in setting up their multi-agency partnership. In 2020, 2,178 Duty to Notify referrals were made for individuals not consenting to being referred into the NRM and this figure is unlikely to reflect all those who do not engage with this process.<sup>4</sup> A partnership approach offering complementary support pathways for victims and survivors of modern slavery at a local level is therefore extremely important and I would encourage this to be greater reflected within the plan.

I also note that the draft plan refers to 'improving the support available to survivors of domestic abuse and their children in refuges and other safe accommodation, primarily through the Mayor's new duty under Part 4 of the Domestic Abuse Act.' In May 2020, I wrote to the Minister for Safeguarding to encourage her to consider extending the automatic grant of priority need status for victims of domestic abuse to victims of modern slavery, recognising the many barriers to accommodation that they also face.<sup>5</sup> Sadly, this was not supported.<sup>6</sup> The recent update to the 'Homelessness Code of Guidance chapter on modern slavery'<sup>7</sup> was a helpful development, however I understand that practitioners are still facing challenges in practice in securing accommodation for victims and survivors outside of the NRM provision. Given what we know about the importance of stable housing in aiding recovery from trauma, and the risks around homelessness and re-

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<sup>2</sup>Such, E. et al. (2021) [Refining a public health approach to modern slavery](#)

<sup>3</sup> HMICFRS, the College of Policing and the Independent Office for Police Conduct (2021), '[Hidden victims: Report on Hestia's Super Complaint on the police response to victims of modern slavery](#)'.

<sup>4</sup> Home Office (2020), '[Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, End of year summary 2020](#)'.

<sup>5</sup> Independent Anti-Slavery Commissioner (2020), '[IASC letter to Victoria Atkins MP](#)'.

<sup>6</sup> Home Office (2020), '[Letter to the IASC from Victoria Atkins MP](#)'.

<sup>7</sup> Department of Levelling Up, Housing and Communities (2021), '[Homelessness Code of Guidance](#)'.

trafficking<sup>89</sup>, I would encourage you to think carefully about how MOPAC may be able to assist in responding to these issues.

Yours sincerely,



**Independent Anti-Slavery Commissioner**

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<sup>8</sup> Project TILI (2021), [‘No way out and no way home: modern slavery and homelessness in England, Wales and Northern Ireland’](#).

<sup>9</sup> [The Passage Modern Slavery Project](#).