

17 August 2021

Chief Constable BJ Harrington
Essex Police
Essex Police Headquarters
Sandford Road
Chelmsford. Essex
CM2 6DN

Dear BJ,

The Grays tragedy and lessons for prevention

We recently met to discuss the Grays incident and you will recall my emphasis on the vital importance of an effective 4Ps response. It is really important to learn prevention lessons in order to reduce the risk of such a tragedy happening. I suggested to you that my office could help to collate and communicate the prevention lessons learned.

My team has had a good meeting with Chief Superintendent Stuart Hooper about the work he and his team have undertaken with ports communities in Essex. There has been clear benefit in engaging with these local ports and I am glad this has continued on a regular basis. It does, however, seem quite informal and there did not appear to be any documents we are able to publish or share. I have therefore written to the British Ports Association and Associated British Ports Holdings setting out the need for them to take this seriously. I have attached a copy of my correspondence to this letter.

Operation Melrose was an excellent investigation and I am keen that all learning is extracted to ensure that we take all possible steps to prevent this from happening again. While I hope that the organisations I have written to will respond with concrete actions, I would also encourage you to codify and promulgate the learning from this appalling case.

Yours sincerely,



Independent Anti-Slavery Commissioner

17 August 2021

Henrik L. Pedersen
Chief Executive Officer
Associated British Ports
25 Bedford Street
London
WC2E 9ES

By email: mary.treacy@abports.co.uk

Dear Mr Pedersen,

My remit as the Independent Anti-Slavery Commissioner is to promote best practice in the identification, prosecution and prevention of modern slavery and human trafficking at home and abroad. I am writing to you because I think more could be done at ports to identify traffickers and their victims. I would like to encourage you to consider what you can do to prevent this exploitative business.

Modern slavery occurs across the British economy, from the supply chains of big business to domestic settings, from sexual exploitation to small entities such as nail bars and hand car washes. It can feed criminal activity such as the cultivation and distribution of cannabis and other illegal substances. Recent estimates suggest that there could be 100,000 people trapped in modern slavery in the UK, and 40 million around the world.

Organised crime groups drive much of this activity, profiting both from the trafficking of vulnerable people and their eventual exploitation. The annual cost of modern slavery to the UK economy has been estimated at between £3.3 to £4.3 billion. This figure was calculated in 2018, when the identification of potential victims was considerably lower than it is today.

During the two years I have spent in this post, talking to policy makers, law enforcement, business, NGOs and immigration experts, the connections between people smuggling and human trafficking have become ever more apparent. The intertwined nature of these crimes was illustrated in Grays, Essex on 23 October 2019, when the bodies of 39 Vietnamese citizens, ten of them teenagers, were discovered in the container of an articulated lorry. The vehicle had just passed through the port of Purfleet on Thames.

Subsequent evidence shows that at least some were tricked and misled as to the dangerous nature of their journey. By the time they reached the UK, all 39 had passed through the hands of a number of highly organised and ruthless criminal groups. And, with every leg of the route, each would have racked up increasing levels of debt. It is highly likely that most, if not all, would have ended up working in exploitative and potentially dangerous conditions, hidden in the supply chains of legitimate businesses, or in the shadow economy. The need to pay back heavy debts, combined with their irregular status, would have ensured that they

remained under the control of their traffickers indefinitely or, as a minimum, for many years.

As this incident revealed, the networks of criminals behind this complex ecosystem were seasoned operators who showed callous disregard for life, while profiting greatly from the vulnerability, desperation and misery of others. They were also adept at exploiting loopholes and standard checking procedures within the logistics and shipping industry.

I believe that ports, operators and the wider business communities surrounding them could play a greater role in detecting anomalies, reporting suspicions and working collaboratively with law enforcement. Since the Grays incident, Essex Police have set a strong example of engagement and liaison with Purfleet and neighbouring ports. However, this threat affects our entire coastline. Smaller ports and harbours are also vulnerable to being targeted or infiltrated by ruthless gangs. It would be encouraging to see a more coordinated national response, and more initiatives at a local level.

The UK Modern Slavery Act 2015 requires companies with a turnover of £36 million or more to report on the steps that they are taking to tackle the risk of modern slavery and human trafficking in their operations and supply chains. It is clear that there is an ongoing risk of criminals trying to traffic people through ports. As a major operator, I would therefore invite you to set out in your next modern slavery statement what steps you have taken to combat crime and safeguard human life within your network.

Organised crime groups will continue to evolve their methods to evade detection. The possibility that tragedies similar to Grays could happen again remains high. Therefore, utmost vigilance is needed from the public and private sector stakeholders and all parts of society in combatting this abhorrent disregard for human life.

I hope you find this interesting and would welcome any thoughts that you have on this matter.

Yours sincerely,



Independent Anti-Slavery Commissioner

17 August 2021

Richard Ballantyne
Chief Executive
British Ports Association
1st Floor
Park Street
London
SE1 9EQ

By email: richard.ballantyne@britishports.org.uk

Dear Mr Ballantyne,

My remit as the Independent Anti-Slavery Commissioner is to promote best practice in the identification, prosecution and prevention of modern slavery and human trafficking at home and abroad. I am writing to you because I think more could be done at ports to identify traffickers and their victims. I would like to encourage you to consider what you can do to prevent this exploitative business.

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The UK Modern Slavery Act 2015 requires companies with a turnover of £36 million or more to report on the steps that they are taking to tackle the risk of modern slavery and human trafficking in their operations and supply chains. There is an ongoing risk of criminals attempting to traffic people through ports. I would, therefore, invite your members - including the operators and businesses within these ports - to set out in their next modern slavery statements what they have done to combat crime and safeguard human life within their operations.

Organised crime groups will continue to evolve their methods to evade detection. The possibility that tragedies similar to Grays could happen again remains high. Therefore, utmost vigilance is needed from public and private sector stakeholders and all parts of society in combatting this abhorrent disregard for human life.

I hope you find this interesting and would welcome any thoughts that you have on this matter.

Yours sincerely,



Independent Anti-Slavery Commissioner