

Modern Slavery Multi-Agency Case Conferences at The Passage¹

Evaluation Report from November 2018 to December 2019

Summary

The Passage established a Multi-Agency Case Conference (MACC) approach to safeguarding potential victims of modern slavery (PV), trafficking and exploitation who are homeless, including people with no recourse to public funds (NRPF). The MACC pilot project started in November 2018 in partnership with Westminster City Council (Adult Safeguarding Team and Housing Team) and the NHS Central London Homeless Teams (Homeless Health Team and Joint Health Team), having an initial duration of one year². The project explores help available to people at risk of violence and abuse (i.e. (re)trafficking and (re)exploitation) and tests the efficiency of the MACC approach as well as possible replication in other boroughs. By working in partnership with local authorities to support PVs, we provide immediate homelessness relief and aim to prevent (re)trafficking and (re)exploitation.

It is important noting that MACC's only take place for cases where the individual wants to enter the NRM. Support for people refusing to enter the NRM is still a gap that needs to be addressed. This will be discussed in the recommendations.

Multi-Agency Case Conferences (MACC)

Multi-Agency Case Conferences (MACC) are a systematic analysis of potential cases of modern slavery and human trafficking identified by The Passage and seek the following goals:

- Looking objectively at samples of practice and measuring against quality practice standards - local and national;
- Seeking the views of all relevant staff;
- Deciding what actions are needed to make improvements and promote the good practice identified so that it becomes standard;
- A breakdown of the stages involved in the safeguarding process along with associated timescales;
- Identifying any support required for staff to achieve the required changes;
- Re-auditing to measure that improvements have been achieved, maintained and embedded.

Westminster City Council Housing agreed that, in the context of this project, when a person is identified as a PV, they are automatically eligible and considered priority need to secure temporary accommodation until being placed in a government supported National Referral Mechanism safe house, regardless of their immigration status. Homelessness relief and prevention duty is hence fulfilled.

Note that this project was nominated for the London Homelessness Awards 2019 and received the second prize.

¹ The Modern Slavery Multi-Agency Case Conferences (MACC) pilot project at The Passage was originally created in July 2018 in partnership with Westminster City Council, Tri-Borough Modern Slavery Operational Group, NHS Homeless Team, and St Mungo's. The original idea comes from the Welsh Anti-Slavery Coordinator and has been supported by West Midlands Anti-Slavery Network, Human Trafficking Foundation and the International Organisation for Migration.

² Note that the project has been extended until June 2020.

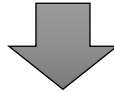
Stages of the safeguarding process

STAGE ONE: ALERT

Initial assessment at The Passage

Safeguarding referral to Westminster Adult Social Care

Target timescales: Same day that the PV is identified



STAGE TWO: MULTI-AGENCY CASE CONFERENCE

A MACC holds a discussion to assess needs and risk, establish the outcome desired by the PV, and agree on a personalised action plan to keep the person safe (i.e. accommodation, food, toiletries, clothing, health and mental health)

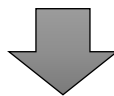
Target timescales: Within 48 hours of the alert



STAGE THREE: REFERRAL INTO THE NRM

A First Responder refers the PV to the NRM

Target timescales depend on the PV's mental health stability



STAGE FOUR: CASE REVIEW/FOLLOW UP

The team holds a review to check the protection plan is working effectively, where the PV is located and post-NRM support

Target timescales: Within 3 months of referral or as agreed at first MACC

Findings from November 2018 to December 2019

In one year, The Passage organised **11 MACC's for 8 potential victims (PV's)**.

2 PV's were female and **6 were male**.

7 PV's had **no recourse to public funds** and all were homeless at the time of identification.

The PV's **countries of origin** were Romania (3); Ireland (1); Nigeria (1); Poland (1); Trinidad and Tobago (1) and United Kingdom (1).

Types of exploitation experienced by the PV's³:

- Forced labour (5) in restaurants, car washes, construction and roofing in private houses
- Domestic servitude (2)
- Criminal exploitation (2) - benefit fraud and drugs sale
- Child slavery (2) - historic cases
- Sexual exploitation (1)
- Forced marriage (1)
- Potential organ harvesting (1)

The **locations of recruitment** were: Aylesbury; Belgium; Kilburn; Nigeria; Romania; Victoria Piazza; Wembley and Whitechapel.

The **locations of exploitation** were: Brent; England (various sites); Greater London (various sites); Ilford; Kent (near Dover); Oxford; St Albans; Whetstone; Wimbledon; Windsor; Wycombe.

The **locations of identification** were The Passage Resource Centre and Passage House.

Abuse suffered:

- Abuse over mental health vulnerability
- Deception
- Forced to take drugs or drink alcohol
- ID taken
- Little or no payment
- No freedom of movement
- Not given food
- Physical abuse (beatings, burnt with cigarettes, whipping with a belt)
- Sexual abuse (rape)
- Threatens to life and to family
- Unsuitable imposed accommodation
- Verbal abuse

Mental health problems observed:

- Depression and anxiety
- Emotional Unstable Personality Disorder
- Epilepsy from stress
- Fear
- Loss of memory
- Panic attacks
- Paranoia delusions
- Post-Traumatic Syndrome Disorder
- Psychosis
- Schizophrenia
- Self-harm
- Sleep trouble
- Substance misuse
- Suicide ideation and suicide attempts

³ Note that some PV's experienced more than one type of exploitation by the same perpetrators. For instance, the two cases of historic child slavery involved domestic servitude, forced criminality and sexual exploitation.

7 MACC's led to positive reasonable grounds decision; 2 MACC's were held during the NRM (the PV had already received positive reasonable grounds decision); and 3 cases required 2 MACC's per PV. These 3 cases required 2 MACC's for different reasons: the PV was evicted from a state-funded safe house and came back to The Passage (2 MACC's during NRM support); the NRM took a long time to provide support and The Passage needed to arrange emergency accommodation in partnership with Westminster Council Housing; the case was extremely complex and included other factors such as domestic violence, substance misuse and serious mental health problems. In this last case, the PV withdrew from the NRM after receiving positive reasonable grounds (RG) decision.

Regarding the MACC's held in pre-NRM time (7 PV's), the periods between identification and moving to an NRM safe house differed from 13 days to 64 days. There are different reasons for this. In one case, the PV was not sleeping rough and was not in immediate danger, therefore we could arrange a later suitable date and time with all necessary agencies. In the other case MACC's were held for various cases in Westminster and again, it took more time to arrange a suitable date to all.

PV consents to enter the NRM	MACC	NRM form sent by FR ⁴	Positive RG decision	Relocation to NRM safe house	Total number of days of pre-NRM support
Day 1	Day 2	Day 6 (Met Police)	Day 14	Day 13	13
Day 1	Day 2	Day 1 (WCC Housing)	Day 16	Day 17	17
Day 1	Day 2	Day 5 (WCC Housing)	Day 19	Day 64	64 (until NRM outreach support but Passage still provides services ⁵)
	MACC 2 Day 45				
Day 1	Day 7	Day 17 (Met Police)	Day 19	Day 39	39
Day 1	Day 5	Day 11 (WCC Adult Social Care)	Day 15	Withdrawal	At the time of this report The Passage is still providing support
	MACC 2 Day 27				
Day 1	Day 3 ⁶	Day 7 (WCC Housing)	Day 14	Day 21	21
Day 1	Day 3	Day 2 (Met Police)	Day 8	Day 15	15

⁴ FR: First Responder

⁵ The Passage Immigration Solicitor

⁶ Note that MACC's on Day 3 are still held within 48 hours following the PV's consent to enter the NRM.

Monitoring the MACC approach

After every MACC, a monitoring survey is filled by The Passage Anti-Slavery Coordinator. The survey is as follows:

Date of MACC:

1. Alert	Yes	No	N/A
Was there a timely response to the alert?			
Was the safety of the adult addressed?			
Were there any problems encountered?			
If yes, please explain here:			

2. MACC	Yes	No	N/A
Did it take place within 48 hours of receiving the alert?			
Did all relevant agencies take part?			
Was an action plan produced?			
If problems were encountered, please explain here:			

3. Referral to the NRM	Yes	No	N/A
Did it take place?			
Who sent the referral to the HO?			
Were there any problems encountered?			

5. Multi-agency involvement	Yes	No	N/A
Was the input from each relevant agency appropriate?			
Were the police involved?			
Was the response from the police appropriate?			
Was any safe house involved?			
Was the response from the safe house appropriate?			
If problems were encountered, please explain here:			

4. Follow up	Yes	No	Don't know
Date:			
Do we know where the PV is?			
Is the PV still at risk?			
Is Westminster and The Passage safeguarding process still open?			
If you know where the PV is, please say where (e.g. TSA safe house):			

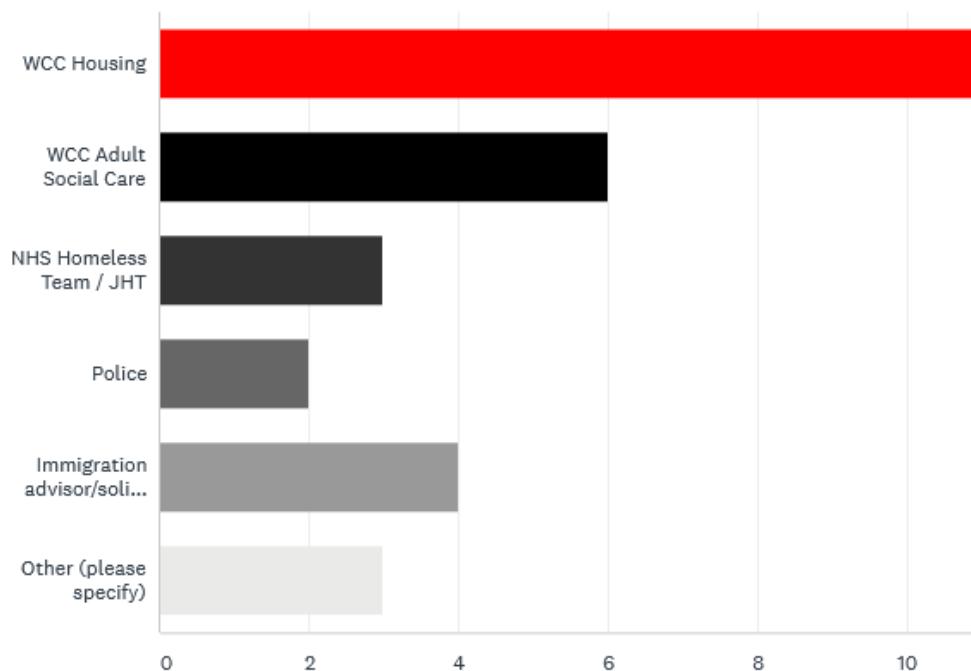
The responses are collated and summarised by Survey Monkey software.

Evaluation of MACC's performance

Westminster City Council and The Passage were present at all MACCs. For the PV's who did not require to see a nurse, the MACC did not request the Homeless Health Team nor the Joint Homeless Team. Adult Social Care was not required in cases that were not a safeguarding issue (for instance a historic child slavery case). Some clients have immigration status and thus did not need immigration solicitors. Also, when a client does not give consent to talk to the police and/or is not an emergency, police were not included. The other organisations that participated in MACC's were Hestia, Anti-Slavery International and Stop the Traffik (Tri-Borough MSE Coordinator).

Attendees

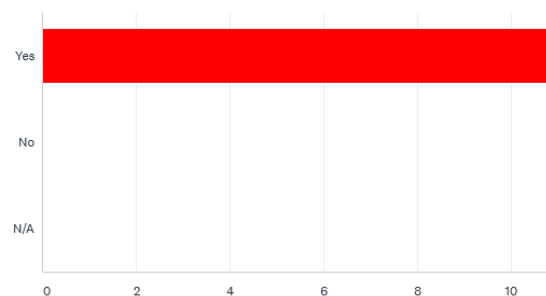
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In every case, the first stage of the safeguarding process (modern slavery assessment and safeguarding referral) was completed in the same day of the identification.

Was there a timely response to the alert (same day)?

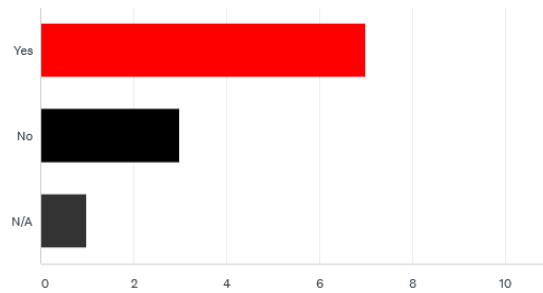
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As regards to the second stage of the safeguarding process, 7 MACC's took place within 48 hours after the alert. 3 MACC's took place after 48 hours for two reasons: Westminster Council organised various MACC's for the same day concerning PV's identified by other organisations; and the PV's were safe in hostels. 1 MACC was organised later in the week because it was a historic case of child slavery and the PV was not in danger. However, in this last case, the PV was taken off the streets immediately.

Did the MACC take place within 48 hours after the alert?

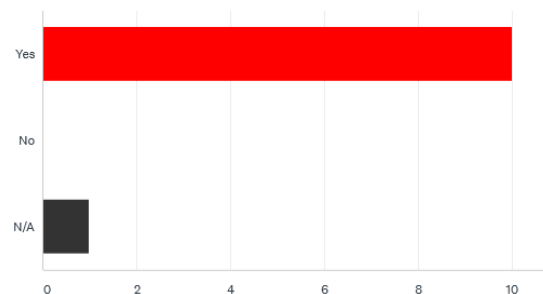
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The safety of the PV was addressed at 10 MACC's. One PV was not in danger as his case was historic and the trafficker is no longer considered a threat.

Was the safety of the person addressed?

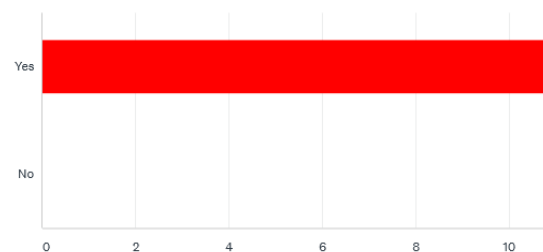
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An action plan was produced at all MACC's.

Was an action plan produced?

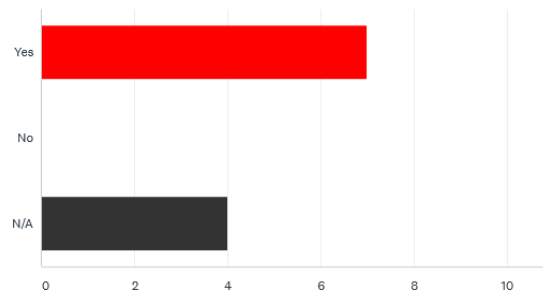
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NRM referrals were made following 7 MACC's (all referrals received positive reasonable grounds decision from the Home Office). 4 MACC's were held during the NRM period of support.

Did the NRM referral take place?

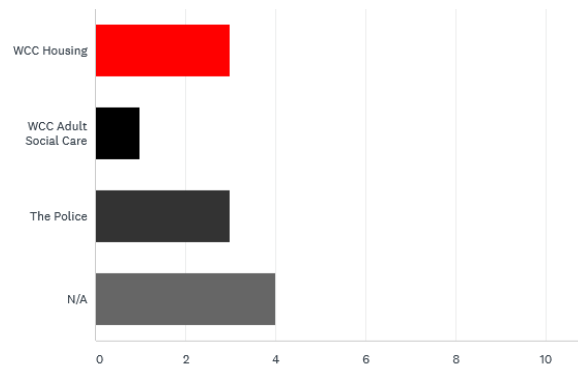
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The Met Police and Westminster City Council Housing did 3 NRM referrals each and Westminster Adult Social Care did 1 NRM referral (stage three of the safeguarding process). As stated before, 4 MACC's were held during the NRM period of support.

Who sent the NRM referral to the Home Office?

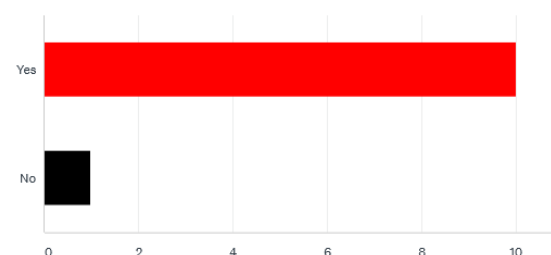
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In the majority of the MACC's, all agencies contributed with their knowledge of the case and their expertise (i.e. health and mental health problems from the NHS homeless teams, overview of the case by The Passage frontline worker, Care Act, Mental Health Act, capacity to consent from Westminster Adult Social Care and suitable emergency bedding from Westminster Council Housing). The case in which there was an insufficient input is due to the fact that one agency did not respond to the MACC email and calendar invite.

Was the input from each relevant agency appropriate?

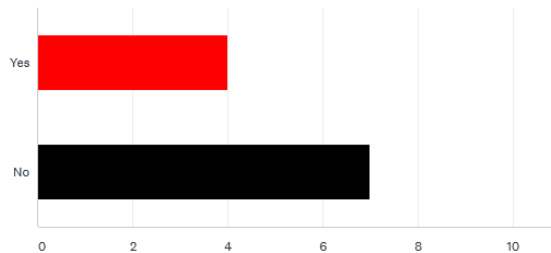
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The police were not involved in 7 MACCs because the PV did not give consent. In one case, as stated previously, the historic case of child slavery did not require police input.

Were the police involved?

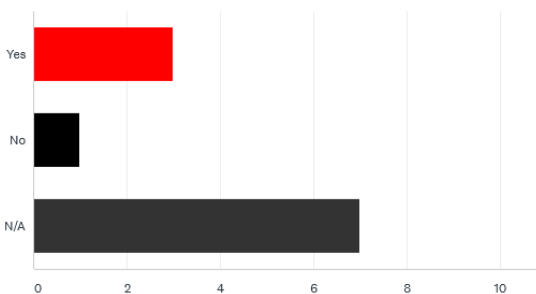
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Out of the 4 cases in which police were involved, 3 received an adequate and rapid response. In one case, the police met the PV four days after The Passage called 101. Such a late response was due to the lack of police officers' availability. This shows that police need more resources for incidents that are not emergencies.

Was the response from the police appropriate?

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2 MACC's included an organisation that has safe houses (under the NRM) and their response was generally appropriate. These 2 MACC's (for two different PV's) resulted in better support: in one case this resulted on temporary accommodation for the whole NRM period of "reflection and recovery" and in the other case it resulted in finding the missing PV and place him in safe accommodation (although he later went missing again and withdrew from the NRM).

As regards to the fourth stage of the safeguarding process (i.e. follow up three months after the MACC's), we can produce the results for 6 cases. The other two are too new to have follow up information.

In the 6 cases, we know where the PV is:

- 4 PV's are in NRM safe houses
- 1 PV is still receiving homelessness services and support from The Passage
- 1 PV withdrew from the NRM but is not receiving support from The Passage

We therefore suppose that the 4 PV's in safe houses are not currently at risk. However, 2 PV's are still at risk (the ones who withdrew from the NRM). Consequently, the MACC safeguarding process has ended for the 5 cases who are still in safe houses and for the PV who withdrew from the NRM and is in the London area. However, the safeguarding process is still open for the PV who is still in Westminster.

Throughout the project, we encountered several challenges:

- 1 PV withdrew from the NRM following an assessment from a Home Office Victim Care Contract holder which re-traumatised the PV;
- 1 PV went missing during the NRM period of “reflection and recovery”;
- This same PV presented such complex needs due to his mental health (i.e. suicide attempts on almost daily basis) that it was virtually impossible to place him in suitable emergency accommodation. In other words, the hostels were not prepared to support someone who needed 24/7 suicide watch;
- In 3 cases, the PV’s were under The Passage care for a very long period of time. This resulted in Westminster Council Housing having to find various hostels for the victims after the initial 7 nights. Note that hostels accept to bed PV’s within Westminster Emergency Bedding Protocol for 7 nights.
- It is not always possible to bring together all relevant agencies within 48 hours.
- It is difficult to get information for the follow up due to GDPR.

Conclusion

The MACC approach came into being due to challenges faced by The Passage as regards to support to victims of modern slavery. For example, due to the time it was taking to find a First Responder (who is not a police officer) available to refer the PV into the NRM, The Passage overspent in B&B as emergency accommodation. Also, there were concerns about safeguarding vulnerable adults who are not street savvy and therefore at risk of abuse in homeless day centres and night shelters. In other words, housing authorities and adult social care should be involved as soon as possible.

In addition, The Passage realised that it is easier for a PV to talk about their traumatic experiences to a nurse or a doctor. Health agencies play a key role in unveiling risks (i.e. HIV), mental health problems, capacity to consent, etc. Their knowledge of the cases is a plus-value to find appropriate bedding and for referrals for specialist support.

Indeed, the complexity of some cases require a multi-agency approach, and this is especially true for cases of modern slavery. The MACC approach helps to address the case from various perspectives (safeguarding, health, bedding) in one single meeting. It also provides important information to local authorities about criminal trends in their boroughs.

The MACC pilot project’s results are overall positive. It demonstrates the need and benefits of working in partnership. This is true both for the agencies and for the PV’s. Frontline staff feel supported, agencies respond to their safeguarding and safety duties by providing care and support in a timely manner, and PV’s are rapidly taken out of the streets therefore avoiding the risk of re-trafficking. Therefore, the MACC approach contributes to improving victim support provided by The Passage and by the local government until the PV moves to a state funded safe house.

The Passage is grateful for the continuous support of Westminster City Council. Their Emergency Bedding Protocol is extremely useful, and the hostels’ managers are professional and understanding. The Passage is also thankful to the nurses of the Homeless Teams for their invaluable knowledge and their availability.

Indeed, partnership is essential to exchange sensitive information which allows to provide suitable support to extremely complex cases. Finally, the key to the success of the fight against modern slavery and exploitation is partnership. In addition, the partnerships within the MACC project also help in reducing and relieving homelessness.

Where do we go from here?

Minor changes are applied to the project as it goes on. For instance, we intend to add a fifth stage in the safeguarding process: an annual follow up. This is due to the fact that conclusive decisions from the Home Office (i.e. which state that a person is a confirmed victim of modern slavery) are currently taking more than 3 months. This means that the majority of PV's are still in a state-funded safe house within the fourth stage of the safeguarding process. The Passage and Westminster City Council need and should know when a victim leaves the safe house and if they are confirmed victims once they leave the safe house because the person will almost inevitably come back to Westminster.

At the time of writing this report, Westminster City Council continues to fully support the MACC pilot project and its partnership with The Passage to support victims of modern slavery identified by The Passage. The Council is currently debating on the possibility to carry out MACC's for all PV's (and not only PV's who are homeless).

This project can be replicated in other boroughs and by other charities. The Passage is sharing our expertise with other local authorities with the support of Human Trafficking Foundation through the London Modern Slavery Leads Group. The Passage is also in talks with other charities in Westminster to harmonise this approach throughout the borough.

A problem remains: what can be done to support PV's who refuse to enter the NRM? As opposed to First Responders, The Passage does not have the statutory duty to notify the Home Office when a PV is identified by our staff. A MACC does not seem appropriate if the client does not consent to share their personal information. The Passage privacy policy is clear and to breach it is a reputational risk. By organising a MACC, the local government is informed of this potential case of modern slavery. They thus have the duty to notify the Home Office.

Last but not least, The Passage is committed to raise funds for a team of modern slavery navigators who will support not only PV's identified at The Passage but also identified by other charities in Westminster to provide additional support to victims and survivors of this crime.