

17 June 2021

Dear

The role of PCCs in tackling modern slavery

Congratulations on recently being elected as Police and Crime Commissioner. As Independent Anti-Slavery Commissioner, I am writing in connection with my statutory responsibility to encourage good practice in the prevention, detection, investigation and prosecution of modern slavery offences and the identification of victims. My office comprises of a small team with policy leads aligned to each of the priorities set out within my [Strategic Plan 2019-2021](#): improving victim care and support; supporting law enforcement and prosecutions; focusing on prevention; getting value out of research and innovation; as well as a policy lead for international activity.

Modern slavery is a serious crime in which individuals are exploited for little or no pay. Exploitation includes, but is not limited to, sexual exploitation, forced or bonded labour, forced criminality, domestic servitude, and the removal of organs. It is extremely difficult to accurately assess the prevalence of modern slavery in the UK, however what we do know is that the number of potential victims identified is increasing. In 2015, there were 3,264 potential victims of modern slavery referred into the National Referral Mechanism (NRM), the UK's framework for victim identification and support. In 2020, this had increased to 10,613 potential victims¹. Whilst improved identification is a positive step, it must be acknowledged that this increase in referrals is placing greater demand on both the NRM system, as well as local authorities and other local safeguarding partners. There is also a growing number of referrals for UK nationals, for child victims, and for adult victims with complex support needs.

As elected strategic leaders for the local delivery of policing and community safety, Police and Crime Commissioners (PCCs) are ideally placed to initiate and coordinate activity to tackle modern slavery, encouraging a whole system approach. This can include:

- Understanding the local picture and ensuring that the commissioning of victims' services reflects this. As the number of potential victims identified increases, there is a growing need for local victim care pathways to complement the national NRM provision and ensure access to support pre-NRM and post-NRM, as well as for those who do not consent to the NRM process;
- Encouraging a multi-agency response to modern slavery that brings together community safety and criminal justice partners, among others. Many parts of the UK have now

¹ Home Office (2021) 'Modern Slavery National Referral Mechanism Statistics': <https://www.gov.uk/government/collections/national-referral-mechanism-statistics>

established anti-slavery partnerships² and in some regions, OPCCs have a significant role in funding and/or co-ordinating this activity;

- Ensuring that measures are in place to prevent and minimise the risk of modern slavery taking place within both domestic and global supply chains. Section 54 of the Modern Slavery Act 2015 requires commercial organisations with a turnover of more than £36 million to annually report on the steps that they have taken to prevent modern slavery within their supply chains. Last year, the Government announced that they would be extending this duty to public bodies³;
- Raising awareness of modern slavery within local communities;

As highlighted above, it is clear that there are multiple areas where PCCs can add value to local responses to modern slavery. I therefore encourage you to include modern slavery as a priority within your Police and Crime Plan to assist you in holding other organisations to account and to help promote a collaborative, victim-centred approach to tackling this heinous crime.

Violence Reduction Units

In October 2020, I [wrote to](#) PCCs from the force areas with a Violence Reduction Unit (VRU) in order to better understand their VRU's strategic priorities and where this might overlap with the work of my office. I received responses from 16 of the 18 PCCs with VRUs including copies of their Response Strategies and Strategic Needs Assessments. Overall, I was encouraged to see the breadth of work being undertaken by the VRUs and the efforts to work across organisations to embed a public health approach at a local level.

One of the areas where there was the most substantial overlap between the priorities of the VRU's and those set out in my Strategic Plan was in relation to responses to child criminal exploitation (CCE) and county lines. As highlighted by the National Safeguarding Practice Panel Review on safeguarding children at risk of CCE⁴ and the Serious Case Reviews for Jaden Moodie⁵ and Jacob⁶, practitioners can face significant challenges in supporting children who are subject to extra-familial harm. Similar themes were also identified in my review of the Section 45 statutory defence that I published last year⁷.

The responses from VRUs highlighted a range of interventions to respond to CCE including: pilots to test contextual safeguarding approaches; research to establish the effect of social media on violence

² University of Nottingham Rights Lab (2020), 'Partnerships for freedom: Improving multi-agency collaboration on modern slavery: <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2020/september/partnerships-for-freedom.pdf>

³ HM Government (2020), 'New tough measures to tackle modern slavery in supply chains';

<https://www.gov.uk/government/news/new-tough-measures-to-tackle-modern-slavery-in-supply-chains>

⁴ The Child Safeguarding Practice Review Panel (2020), '[It was hard to escape: Safeguarding children at risk from criminal exploitation](#)'

⁵ Waltham Forest Safeguarding Children Board (2020), 'Serious Case Review: Child C – A 14 year old boy': https://www.walthamforest.gov.uk/sites/default/files/WFSCB%20-%20SCR%20Child%20C%20May%20final_.pdf

⁶ Oxfordshire Safeguarding Children Board (2021), '“Untouchable Worlds”: Protecting children who are criminally exploited and harmed': <https://www.oscb.org.uk/oscb-publishes-a-child-safeguarding-practice-review-concerning-jacob/>

⁷ Independent Anti-Slavery Commissioner (2020), 'The Modern Slavery Act 2015 Statutory Defence: A call for evidence': <https://www.antislaverycommissioner.co.uk/media/1478/the-modern-slavery-act-2015-statutory-defence-call-for-evidence.pdf>

and exploitation; awareness raising activity in schools; the use of mentors; navigator roles in custody suites and A&E; training for professionals on trauma informed approaches and use of a social network analysis tool to understand wider risk across peer groups.

These are all examples of promising practice. It is essential however that any learning from such interventions is used to help improve understanding of what works nationally. This is particularly important as we move closer to the end of the funding commitment from the Home Office for the VRUs and towards the introduction of the Serious Violence Duty. I have raised my concerns regarding the response for children who are criminally exploited with senior officials from the Department for Education and we are currently exploring opportunities to bring together sector stakeholders to discuss strengthening the safeguarding system for children at risk of extra-familial harm.

Finally, you may be interested to know that my office recently published some [research](#) in collaboration with the University of Sheffield and Public Health England on refining a public health approach to modern slavery. This includes a co-produced interactive framework, as well as resources for anti-slavery partnerships to assist them in reflecting on their own activity at a local level to identify where there may be gaps in their response. I hope that this resource is useful for your office and for your local partners.

Yours sincerely,

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

Independent Anti-Slavery Commissioner