

Tackling modern slavery

Council case studies

Foreword

Ten years ago, if you had asked what people associated with the word slavery, the chances are that they would have said the transatlantic slave trade or the 17th and 18th century abolitionist William Wilberforce, rather than anything linking slavery to the present day. Yet the UK, and virtually every country in the world, now face the challenge of modern day slavery. Despite the efforts of many statutory and voluntary sector bodies to raise awareness, there are still many people in the UK who do not understand that slavery is still with us now, and in many very unpleasant forms. Modern slavery is a crime and as a result it is often hidden but, because it is all around us, it is often referred to as being 'hidden in plain sight'.

Since beginning our collaborative work with the first Independent Anti-Slavery Commissioner in 2016, the Local Government Association (LGA) has sought to support councils as they try to increase awareness of the issue and tackle modern slavery in their areas. The case studies in this document build on the detailed guidance we published in 2017, and on the modern slavery workshops which we have held around the country. We are delighted to be able to follow up our earlier work by highlighting the good work that councils are undertaking to try to tackle and prevent modern slavery and support its victims.

We are grateful both to those authorities whose case studies are included in this document, and to the others which submitted case studies which we were unable to include for reasons of space. It is clear that there is a wealth of experience and knowledge available now within local government, and that growing awareness will enable councils to make an even more substantial contribution to this important struggle. Most important of all, it seems clear that local government is now taking a prominent role in the growth of local anti-slavery partnerships which enable the experience, skills and knowledge of many different organisations to be brought to bear in tackling modern slavery.

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Modern slavery in the UK and the local government response

An emerging challenge

At the beginning of the 21st century, concern began to be expressed, largely by non-governmental organisations (NGOs), about the issue of human trafficking. One particular challenge in understanding the issues has been the difficulty in establishing a clear picture of the extent of modern slavery in the UK. In 2007, the Joseph Rowntree Foundation commissioned the first national scoping study¹ of modern slavery and, following the recommendations of the research team, developed a national programme of research into forced labour. As awareness grew, by 2010, a national anti-slavery day in October and the All-Party Parliamentary Group on Trafficking had been established. New forms of slavery began to be identified including forced labour, criminal exploitation, domestic servitude, child exploitation (begging, pickpocketing and shoplifting), organ harvesting and cannabis farming.²

New systems and organisations have subsequently been established to try to protect and identify people who are potentially victims of slavery. The Gangmasters and Labour Abuse Authority (GLAA) was established in the wake of the Morecambe Bay tragedy when 23 Chinese cockle pickers who had been trafficked and smuggled, drowned in the bay. Originally responsible for issuing licences to labour suppliers in specific industries, the GLAA now has a broader remit to prevent labour abuse in all sectors.

¹ www.jrf.org.uk/report/modern-slavery-united-kingdom

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/652652/typology-modern-slavery-offences-horr93.pdf

The National Referral Mechanism (NRM) was created to provide a mechanism for reporting and confirming the status of victims of modern slavery; its recently published annual report for 2018 noted that almost 7000 people had been referred into the NRM, a substantial increase (+36 per cent) on the previous year. Labour exploitation is now the most numerous form of modern slavery and UK nationals the most frequently occurring nationality of victims. The debate about the numbers of those in modern slavery in the UK continues with estimates ranging from 13,000 (Home Office) to ‘tens of thousands’ (National Crime Agency) and as high as 136,000 (www.globalsslaveryindex.org).

The Modern Slavery Act, introduced in England and Wales in 2015 now provides the legal and policy framework for responding to modern slavery. The Act has recently been the subject of both a government-sponsored independent inquiry and a separate inquiry by the House of Commons Home Affairs Select Committee. Government’s response to these two inquiries is expected to lead to a number of policy changes.

The local government response

Councils can play a number of different roles in relation to modern slavery:

- identifying and referring potential victims
- supporting victims
- disrupting modern slavery
- ensuring supply chains are free from modern slavery.

Identifying and referring potential victims

The NRM is the formal process for identifying and referring potential victims of slavery to the single competent authority, which makes a two-stage judgement as to whether the claim to be a victim is reasonable and, if so, can then be confirmed. NRM referrals can be made by 'first responder' organisations, including police forces, local authorities, and a number of large voluntary sector agencies. Local authorities are amongst the most significant first responders; of the almost 7,000 referrals made to the NRM in 2018, 1,335 (up from 789 in 2017) were from local authorities, the third highest category of referral after UK Visas and Immigration and local police forces. Individual local authorities made between 1 and 45 referrals in the year.

Supporting victims

During the period that a potential victim's claim is being assessed, the victim is entitled to support. Support is provided for adult victims by The Salvation Army, working to a contract with the Home Office, which subcontracts with a number of organisations across England and Wales. However, depending on the age and needs of victims, local authorities may also have separate legal obligations to provide other statutory support to potential child and adult victims, in terms of social care support and housing.

Disrupting modern slavery

Councils also have a role to play in disrupting modern slavery in their area. They are under a legal duty to do all they can to reasonably prevent crime and disorder in their areas, including modern slavery, and will be members of a number of partnerships which seek to tackle it. Through their day-to-day work with local businesses, a range of council regulatory services may be able to identify cases of modern slavery – and also have a number of enforcement tools and powers of entry that may be helpful in targeting perpetrators of modern slavery alongside other types of rogue business.

Ensuring supply chains are free from modern slavery

Finally, although councils are not currently legally bound by the Modern Slavery Act's requirements on transparency in supply chains³, currently many councils are already working to eradicate modern slavery from their supply chains. Local government has the opportunity to use its extensive buying power to help mitigate the risks of slavery occurring in its supply chains by adopting new processes and procedures, in both procurement and supplier/contract management, including mapping supply chains to assess particular product or geographical risks; evaluating the modern slavery and human trafficking risks of each new supplier and conducting supplier assessments on an annual basis.

About this document

In 2017, the Local Government Association (LGA) published guidance for councils on the role that they can play in responding to modern slavery: www.local.gov.uk/modern-slavery-council-guide. This report builds on that by providing a series of council case studies which demonstrate the wide range of activity now underway within local government to respond to the growing threat of modern slavery in the UK.

As the type and complexity of forms of modern slavery have grown, so too has the need for a wider response from local government. It has become clear that many departments within every type of local authority, however big or small, may need to be involved in campaigns, referrals and assessments – whether social care, housing or regulatory services.

The case studies in this document are intended to offer a representative sample of the different ways in which local authorities have responded to modern slavery in their area.

³ The Government is currently consulting on including public authorities within the scope of these requirements, following a recommendation by the independent review of the MS Act.

In doing so, they focus on five themes which build on the core council roles outlined above:

- providing support to child victims
- providing support to adult victims
- community safety and disruption activity
- ensuring supply chains are free from modern slavery
- effective internal structures and work with external partners to tackle modern slavery.

The case studies were provided in some cases by councils nominating their own work; in others, the authors were aware from their related work and networks that the work being presented was well-regarded outside the local authority. However, the case studies here do not represent the beginning and end of good practice in anti-slavery work within local government, and we would welcome further examples of case studies, which can be submitted via our website: www.local.gov.uk/case-studies

Case studies

City of Bradford Metropolitan District Council

Main modern slavery theme | Providing support for adult victims

General context and approach

City of Bradford Council has created a service to help the most vulnerable including those who might be victims of modern slavery.

As part of Bradford's support, it works closely with other agencies to help safeguard and promote the wellbeing of service users and multiagency working is a key part of their response. They commonly refer or signpost service users to refuges, free immigration advice services, and charities such as the anti-trafficking NGO Hope for Justice.

Aims/objectives of work

When dealing with victims of modern slavery, the council uses the following pathway. If at the screening stage an individual is believed to be a victim of slavery, the council will arrange a meeting as soon as possible to discuss further details and fulfil their duty to refer, through the NRM, if the service user agrees to this. There is no set policy on timescales for this: some victims will be extremely anxious about discussing their experiences or may not believe they have been a victim of human trafficking, so the council's team will not force them to engage with this process if doing so will risk them disengaging from council services altogether. However, the council has said that they normally fulfil the duty to refer within 24-48 hours of encountering a victim of modern day slavery.

Additionally, the council has a protocol with Hope for Justice and their Adult Services Access Point to complete the NRM paperwork and sign it off as the responsible public body. The Department of Health and Wellbeing Access Point work collaboratively with Hope for Justice to ensure that the process is reassuring and compassionate for the trafficked person.

For victims of trafficking who are in the NRM but are excluded from support, Bradford's procedure would be that if an individual has a positive reasonable grounds decision and is in the NRM but also destitute, the council would automatically treat them as a high priority case, requiring accommodation that day, under section one of the Localism Act. This is to prevent any risk of being subject to inhumane or degrading treatment, or being re-trafficked, or of breaching their Article 3/ Article 4 rights. The council would then liaise with The Salvation Army immediately to see if they could arrange accommodation for the individual. Should this be refused, the council would make a referral to Hope for Justice as soon as is practical to seek support with getting the individual back into Salvation Army accommodation, if necessary through getting them legal advice. While involved with the individual, the council team would refer to other organisations as appropriate.

Bradford's public health department has recently commissioned a new specialist service for individuals with multiple needs at risk of/or engaged in sex working. The contract commenced on 1 April 2019 and will provide support and interventions to individuals who may have been coerced or forced into sex working and may include victims of slavery and human trafficking.

What the council did/ delivery approach

Bradford council's Immigration and Asylum Unit (IAU), part of the adult social care department, was formed in 2004 in response to the increasing numbers of no recourse to public funds (NRPF) cases being referred to the council. Bradford wanted to protect and safeguard the NRPF individuals they were seeing, and take into account the powers

and duties they have, under domestic and international legislation, to avoid people falling into destitution and exploitative situations.

Bradford has created the following process for adults with NRPF. The initial process for any destitute adult would be to refer the adult to housing to assess eligibility. If they are found to be ineligible for support under the Housing Act, they are immediately referred by the housing department to the IAU. The IAU will then undertake a pre-assessment screening tool with the service user to confirm destitution and record the case background. If this is not possible on the same day and there are concerns that the service user will be street homeless, accommodation and subsistence will be provided pending completion of the pre-assessment screening tool. If a service user is found to be destitute, with either an appearance of a health/social care need, or concerns are raised about a risk of breaching their human rights, Bradford Council will provide subsistence and accommodation, pending the outcome of further assessments or a change in circumstances meaning the service user no longer requires support.

Accommodation is prioritised on the basis of need: for a vulnerable adult to be street homeless, or at risk in current accommodation, would be considered a priority need and would lead to an individual being provided emergency accommodation immediately. This is to prevent any potential breach of human rights under Article 3 or Article 4 of the ECHR caused by making a vulnerable adult homeless or putting them at risk of harm.

Because of the highly varied nature of the client group, the council decided to not have strict internal policies on multiagency working (beyond fulfilling statutory duties such as duty to refer, meeting responsibilities under GDPR etc). Decisions about specific cases are made by the individual case worker, with the support of a manager and colleagues, in consultation with the service user and relevant agencies.

This enables the council to have the flexibility to quickly react to the needs of the individual and of the service as a whole. Consistency is maintained through all cases being handled by the same specialist team, enabling expertise to be pooled.

Outcomes and learning points

A test case was used by the team to make sure the council's processes were robust enough to support a vulnerable adult who fell outside the normal criteria for support. The aim was to support the client to receive the most appropriate support for meeting their needs, and to ensure that the client did not become destitute while waiting for this to be resolved. It was a valuable learning experience which the council has put into practice as a standard response to such cases going forward. Having a dedicated team responsible for dealing with destitute immigrants and asylum seekers made it much easier to manage the test case and resolve the situation promptly.

The council has found that internal structures have proved very effective in combating and working with victims of trafficking. Going forward, the council is in discussions with other departments, particularly housing, about developing a council-wide, joined-up approach to modern-day slavery cases.

In particular there are established arrangements between the council and Hope for Justice in supporting victims until they have been picked up by the NRM, which have proven effective. As a result of Bradford Council's efforts, anti-trafficking NGOs have relayed positive experiences in terms of the council's approach being victim-focused, compassionate and having a particular understanding of the risks for victims and their likely need for housing.

Cardiff City Council

Main modern slavery theme | Ensuring supply chains are free from modern slavery

General context and approach

Cardiff Council is committed to providing visibility to its modern slavery statement and ensuring transparency in supply chains. To this end the council is working in partnership with the Welsh Government, the wider public sector, suppliers, service providers and others to address modern slavery challenges and drive collaborative action with a view to reducing risks and incidences of modern slavery through commissioning and procurement processes.

The council spends over £430 million annually with over 8,000 suppliers which provide a broad range of goods and services. Over 99 per cent of its expenditure is with UK-based companies. The council recognises that its supply chains spread across the world, and that parts of some supply chains could be tainted by modern slavery. The council has limited resources to monitor and manage its supply chains and so focuses on its direct suppliers, requiring them to ensure that their supply chains are slavery-free.

High-risk sectors include agriculture, leisure, hospitality, catering, cleaning, clothing, construction and manufacturing. A review of council spend shows that for the majority of these sectors, the council provides the service in-house, utilising national frameworks and/or local suppliers.

Aims/objectives of work

To ensure that council suppliers are, as far as possible, operating with supply chains which are slavery-free.

What the council did/delivery approach

The council undertakes due diligence when considering new suppliers and regularly reviews its existing suppliers through its contract management arrangements. The due diligence and reviews include:

- mapping supply chains in high risk areas to assess risks (geographical and product) of modern slavery and human trafficking
- evaluating the modern slavery and human trafficking risks of each new supplier
- conducting annual supplier assessments to create a risk profile focusing on financial stability, also covering compliance with various employment policies including the Welsh Government's Code of Practice: Ethical employment in supply chains
- taking steps to improve sub-standard supplier practices, including providing advice to suppliers and requiring them to implement action plans; for example to demonstrate compliance with safer recruitment guidelines
- participating in collaborative initiatives focused on generic human rights and socially responsible procurement policies, modern slavery and human trafficking in particular
- invoking sanctions for suppliers failing to meet expectations or improve performance in line with an action plan, including provision to terminate the business relationship
- all suppliers tendering for business over £1 million are expected to be a signatory of the Welsh Government's Code of Practice: Ethical employment in supply chains and is encouraged in all other tenders.

Cardiff Council is committed to developing/delivering tailored training to its employees, including the commissioning and procurement team, to raise awareness of modern slavery, human rights abuses and blacklisting. Corporate training will be included as part of the rolling programme of training on the contract standing orders and procurement rules.

This training includes:

- The council's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices; the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage; or the provision of products by an unrealistic deadline.
- How to assess the risk of slavery and human trafficking in relation to various other aspects of the business, including resources and available support.
- How to identify the signs of slavery and human trafficking and action to be taken to report concerns and/or suspicions.
- The initial steps to be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to relevant parties within the council (multi-agency safeguarding hub).
- The external help that is available, including the modern slavery helpline, Gangmasters and Labour Abuse Authority (GLAA) and the Labour Market Enforcement Unit.
- The messages, business incentives or guidance that can be provided to suppliers and other business partners and contractors to implement anti-slavery policies.
- The steps the council should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios or to implement changes in business practices arising from an action plan.

Outcomes and learning points

Cardiff Council has:

- become the first public body in Wales to sign the Code of Practice: Ethical employment in supply chains
- appointed an anti-slavery and ethical employment champion
- established a social responsibility board to oversee the implementation of the code of practice
- started the process of reviewing its supply chains to identify high risk areas
- commenced a review of contract and tender clauses
- developed a socially responsible procurement policy.

Through the socially responsible procurement policy, the council ensures that its direct suppliers are aware of its commitment to tackle modern slavery and human trafficking and that they also understand their obligations as a supplier or contractor of the council.

Chiltern and South Buckinghamshire District Councils

Main modern slavery theme | Providing support to adult victims

General context and approach

Chiltern and South Bucks District Councils have worked closely with local partners over recent years to develop an effective response to modern slavery and exploitation, led by the councils' community safety team. Locally, the councils are active members of various partnership groups set up to tackle this issue, including the Buckinghamshire Adult Exploitation Task and Finish Group and the Buckinghamshire Anti-Slavery Network.

In addition, vulnerability and safeguarding (including modern slavery, CSE and cybercrime) are included as priorities in the Chiltern and South Bucks Community Safety Partnership 2017-2020 plan.

During 2018, there was a steady increase in the number of individuals being referred into the NRM across the Thames Valley, including 36 referrals from within Buckinghamshire. This can largely be attributed to the significant amount of anti-slavery work going on and consequent increases in awareness and understanding.

Aim/objectives of the work

To establish multi-agency reception/support centres for modern slavery victims through an emergency fund.

What the council did/delivery approach

In 2018, the community safety manager for Chiltern and South Bucks District Councils was approached by Thames Valley Police in relation to a planned modern slavery operation, Operation Ravine. Initial intelligence related to a site housing up to 20 potential victims of labour exploitation forced to work on new build construction sites across the South East.

Subsequently, the community safety manager was able to liaise with relevant district and county council departments including housing standards, environmental health, planning enforcement, revenues and benefits, licensing and trading standards to gather information regarding the site and those living there in order to assist with the planning phase of the operation.

Through the general planning process (GPP) led by Thames Valley Police, it was agreed that a reception centre would be appropriate to ensure that any potential victims identified could effectively be safeguarded. A partnership GPP meeting was therefore arranged to share information with partners and to make arrangements for the proposed reception centre in a multi-agency setting, within which the councils had an active role.

Utilising local knowledge and contacts, the councils were able to identify a suitable reception centre venue with access to space for interview rooms, a communal area, sleeping area, toilets and showers as well as a staff room for operational coordination. The councils covered the costs of the venue which was available for up to five nights to allow time for any potential victims to access support through the NRM.

Outcomes and learning points

On the day of the operation, the multi-agency reception centre was established with the following aims:

- to identify potential victims and to offer both short-term and longer term safeguarding opportunities
- to obtain evidence of any criminal activities highlighted by the potential victims.

A range of partners were involved including Thames Valley Police, the National Crime Agency (NCA), Mountain Healthcare, the British Red Cross, Victims First: Willow Project and One Recovery Buckinghamshire (Drug and Alcohol service).

Chiltern and South Bucks District Councils' housing team presence was hugely beneficial to enable the consideration of accommodation options for potential victims outside of the NRM pathway. Other partners, such as the county council's adult social care team, committed to be on standby should their support be required.

Overall, 11 Romanian nationals were de-briefed at the reception centre with six individuals identified to be potential victims of modern slavery and three suspects arrested for modern slavery offences. The reception centre provided support for two days, after which all six potential victims received positive reasonable grounds decisions through the NRM and were placed into safe accommodation. The NCA has described the reception centre as offering a 'gold standard' service to victims.

A partnership de-brief was carried out post-reception centre which identified the following learning points:

- all partners involved felt that the multi-agency planning process was useful to encourage information sharing and to enable a good understanding of the role and expectation of partners involved
- for a reception centre to be effective, it needs to be a multi-agency response as the aims cannot be met by law enforcement alone
- from a local authority perspective, it was useful to take a single point of contact approach using the community safety manager as the conduit to identify the appropriate roles/departments to support the reception centre
- an effective reception centre should have a good balance between those organisations/departments physically present and those who are better placed 'on call'
- the reception centre environment was useful to facilitate 1-to-1 sessions with the Thames Valley Victim Support service to assess the support needs of potential victims, considering both NRM and non-NRM pathways
- partners felt that they could have benefited from a more detailed understanding of the options for potential victims post-reception centre and the associated timeframes for this in order to forward plan.

During 2018, three reception centres were established in partnership across the Thames Valley, enabling the development of good practice and opportunities for further learning.

Cornwall County Council

Main modern slavery theme | Community safety and disruption activity

General context and approach

Cornwall's mainstay industries of fishing, farming and tourism rely heavily upon temporary workers and every year 30-40,000 migrant workers go to Cornwall.

However, there was no permanent Immigration Service, Gangmasters and Labour Abuse Authority, Health and Safety Executive or Her Majesty's Revenue and Customs (HMRC) presence in Cornwall, with the nearest offices hours away. As a result, the council struggled in terms of formal or informal information-sharing with national agencies.

The council's interest in working more closely with a wider range of enforcement agencies was born out of a number of issues including a year-on-year increase in the number of doorstep crime incidents, often involving foreign nationals.

It became clear that teams like regulatory standards could play a key role in uncovering slavery cases. Environmental health and trading standards teams began planned inspections of farms and seafood businesses, partnering with housing officers to provide support to migrant workers; the licensing team worked with the Environment Agency to manage illegal traveller encampment, and in 2015 the council became involved in a government pilot scheme – 'Better Business Compliance' – intended to tackle illegal working and exploitation.

Aims/objectives of work

The Cabinet Office's Better Business Compliance pilots aimed to trial a different approach to securing better compliance amongst local businesses.

It targeted businesses that were likely to pose the highest risk of non-compliance, aiming to turn businesses around or ensuring they ceased illegal business practices.

Although the initiative aimed to improve business compliance, the pilots were primarily intended to tackle illegal working and worker exploitation and unsafe employment practices.

In Cornwall, multi-agency awareness raising training was provided (including an explanation of each agency's roles, remits and powers), joint operations were undertaken (including with private sector housing, the fire service and HMRC) and a mechanism was established for sharing intelligence and incident reports/concerns.

Since the pilot, the council has used other mechanisms to tackle modern slavery. The MIGWAG (Migrant Workers Action Group) was set up to create a multi-agency approach to tackling exploitation, slavery and unfair/unsafe employment practices, where environmental health and housing officers have a partnership approach to providing support and safeguarding migrant workers.

What the council did/delivery approach

Cornwall's pilot and MIGWAG helped to involve regulatory services and other agencies in the discussions and planned responses to modern slavery concerns. Through the pilot they were able to compare information and data held between them and identify the highest risk businesses.

They ran training sessions for 120 officers across a range of agencies around roles, powers and indicators, and created tools to assist officers.

They also developed formal and informal information sharing arrangements.

In addition, the Health and Safety Laboratory undertook a data-collating exercise involving data-sets drawn from trading standards, environmental health, fire and rescue, Companies House, etc. Non-compliant businesses for one regulator were also found to pose the greatest risk of being non-compliant for others.

The MIGWAG partnership also produced advice materials in various languages about employment rights, etc and undertook multiagency 'weeks of action' joint operations each year – targeting businesses which employ temporary and non-UK national employees.

At the same time, Devon and Cornwall Police were gearing up their response to modern slavery and recognised they needed the involvement of local authorities. Since 2016 responsibility for the coordination of response and preventative activities has been taken on by the Safer Cornwall Partnership, under the auspices of the council's Cornwall Safer Communities Partnership, to address serious and organised crime, including modern slavery. Examples of its effectiveness include a trading standards 'doorstep crime' investigation to facilitate access to a premises by police investigating slavery and divert the offender's attention away from the victim.

The multiagency approach ensures effective preparedness. For example, the involvement of the emergency planning team meant they could arrange for a respite centre to be made available for pre-NRM accommodation, prior to a raid, allowing the operation to run smoothly on the day.

Outcomes and learning points

The partnerships have brought together the resources and intelligence of different agencies and national bodies, leading to intelligence and information sharing, training of teams, awareness raising work and multi-agency operations to identify the highest risk businesses. They now have a dedicated lead officer, an agreed multiagency work plan, and have developed a referral pathway. The work has been formally adopted by the Safer Cornwall Partnership.

MIGWAG has led to collaborative enforcement. Investigation between local authority regulatory services and the police, HMRC and other national agencies has become commonplace with regular prompt joint operations, investigations and prosecutions.

As a result the council had 26 referrals in the first two years and 21 multi-agency case reviews, involving services including mental health, drugs and alcohol addiction treatment, domestic violence, adult safeguarding, police, housing, hospital and regulatory services. Five of the cases related to restaurants where the environmental health team was able to undertake 'programmed inspections' to gather intelligence, with two involving EU nationals being lured to Cornwall on the promise of high wages, only to find that they were not paid, slept on the floor and were fed scraps.

An operation in February 2018 on farm workers/flower pickers identified 200 migrant workers. Fourteen agreed to be taken into safety under the respite care arranged by the council. These fourteen revealed that their passports had been taken, they had low or no pay, and there was an array of evidence of human trafficking.

London Borough of Croydon

Main modern slavery theme | Effective internal structures and work with external partners to tackle modern slavery | Community safety and disruption activities.

General context and approach

Council officers in Croydon became aware of human trafficking earlier than many local authorities, and prior to the Modern Slavery Act, as Croydon is a busy transport hub, which has a high number of vulnerable adults and children arriving to visit the Home Office premises based there.

As a result, Croydon Council created a multi-agency response, coordinated through the Prevention of Modern Slavery in Croydon sub-group which meets quarterly and was initially chaired by the deputy chief executive, more recently by the adult safeguarding manager. The membership includes key statutory and voluntary and community sector partner organisations. Croydon Council created a modern slavery project lead post to coordinate actions to tackle the issue of modern slavery. This work is recorded in an action plan and is reported to the adults and children's safeguarding boards by means of an annual report.

Multi-agency working has proven key. As an example, recent disruption activity took place through partnership working with the Gangmasters and Labour Abuse Authority (GLAA), entering properties where it was suspected that potential victims of forced labour were residing and carrying out an operation to identify potential forced street begging.

Aims/objectives of work

Modern slavery is a hidden crime and one of the main aims and objectives of the sub-group has been to ensure that organisations are working more to proactively identify

modern slavery in the community.

The council wanted a clear set of instructions about what to do if a victim is identified and wanted to ensure officers across all departments had adequate training to be able to identify and then refer a potential victim into the NRM.

The overall aims relate to the 4Ps of the Home Office's UK Modern Slavery Strategy 2014:

- pursue – prosecuting and disrupting individuals and groups responsible for modern slavery
- prevent – preventing people from engaging in modern slavery
- protect – strengthening safeguards against modern slavery by protecting vulnerable people from exploitation and increasing awareness of and resilience against crime
- prepare – reducing the harm caused by modern slavery through improved victim identification and enhanced support.

What the council did/ delivery approach

Croydon has undertaken an extensive programme of awareness raising training events using the Association of Directors of Adult Social Services (ADASS) 'train the trainer' model. There are regular training sessions throughout the year and an annual modern slavery conference is also held in Croydon. These events are multi-agency and have been key to ensuring that the issue of modern slavery remains at the forefront for practitioners.

The council originally created a separate adult and child trafficking protocol alongside a pathway that involved two set adult and children's teams who filled out all modern slavery referrals. However, in the last couple of years they have been able to move away from this model, in part due to widespread training across the council, so that referrals through the NRM/MS1 process is the responsibility of a much wider range of officers working within Croydon Council; but they can also access advice and assistance from experienced slavery SPoCs.

The council now has a series of standard operating procedures on slavery rather than a protocol. There is also a revised process map where there is a five-step process used in cases where individuals would not necessarily qualify for a full safeguarding response due to not having eligible care and support needs as set out under the Care Act 2014.

The council's current action plan includes an aim to do the following:

- raise awareness of modern slavery with:
 - practitioners and the public
 - estate agents and hotels (and other organisations which may come into contact with victims of trafficking)
 - schools
 - community and faith groups
- work with partner organisations, ie the Gangmasters and Labour Abuse Authority (GLAA), to identify properties where modern slavery may be taking place
- develop referral processes with A&E for suspected cases
- establish modern slavery champions
- develop NRM/duty to report procedures on databases
- supply chains and commissioning.

Outcomes and learning points

Multi-agency working has been a key factor in driving this work effectively forward as has managing expectations around the NRM. One key learning point raised by, for example, disruption work, relates to the adult's consent to enter the NRM. This is affected greatly by the understanding that some adult victims have about their own exploitation. Unless the suspected victim considers themselves to have been exploited, they are unlikely to consent to enter the NRM process. This is aside from the invisible shackles that may make them reluctant to enter the process, such as threats of violence, coercion, deception and debt servitude. The provision of relevant information in the potential victim's native language is vital to ensure they can make an informed decision.

Croydon Council is currently acting as one of the Home Office pilot sites for post-NRM support. This project is improving the coordination of support provided for European Economic Area (EEA) nationals exiting the NRM process with a positive conclusive grounds decision.

Hampshire County Council

Main modern slavery theme | Providing support to child victims

General context and approach

Due to Hampshire's location – its proximity to London and many transport links – it has been identified as having a significant number of county 'deal lines' in comparison with the rest of the country while its two ports, Southampton and Portsmouth, make it an entrance point for asylum seekers.

As well as Hampshire being an early adopter site for the Independent Child Trafficking Guardian (ICTG) service offering one-to-one support to separated children, Hampshire has a specialist child exploitation team (Willow) currently made up of three social workers, one children and families support worker and two mental health practitioners. Cases are taken from Hampshire MASH for child protection Section 47 and Section 17⁴ assessments, as well as from social work teams across the eight districts.

Hampshire Constabulary also has a specialist Missing Exploited Trafficked (MET) team dedicated to working with exploited children, including safeguarding vulnerable children via disrupting the perpetrators of exploitation and trafficking. Both police and children's services teams work closely together to manage high-risk cases.

Aims/objectives of work

Action was taken in response to an increase of unaccompanied/separated children arriving in Hampshire. This prompted a review of how all children who are potential victims of modern slavery are managed in the first few hours of discovery to prevent issues of going missing and re-trafficking.

⁴ Section 47 of the 1989 Children's Act is a requirement for local authorities to make enquiries where they feel a child may be prone to suffering harm; section 17 is a general duty to provide support, including financial support and accommodation for such children.

It was felt that Hampshire needed a joined-up immediate response to separated children in particular, as well as all children where trafficking was a key indicator, with the aims to:

- use Section 47 to highlight significant risks to professionals
- quickly understand a child's risk and needs
- quickly set up safety planning
- reduce the risk of going missing or being re-trafficked
- identify requirements for ongoing services.

Willow initially was set up for children at risk from sexual exploitation. Over time the team evolved into a child exploitation team managing high risk cases – including county lines, child criminal exploitation, slavery, child sexual exploitation (CSE) and organised crime groups – all of which are seen as being underpinned by trafficking factors.

What the council did/ delivery approach

Willow and MET agreed a protocol supporting multi-agency joined-up working and information sharing. Hampshire's policy ensures that every separated or unaccompanied child was deemed a potential trafficking and Section 47 child protection case.

Children are seen promptly by a social worker and an officer from the MET police team, while the trafficking assessment is designed in-house so is transferrable between agencies to both MET and the children's services department. A trafficking assessment is undertaken with an interpreter to better understand the child's experience as well as to gather data about family and any risks that the multiagency team need to consider.

Safety plans are made around social media use and ensuring one-to-one support and attention, with comprehensive instructions given to carers on actions in the first few weeks. NRM and ICTG referrals are progressed if trafficking indicators are present. 'Flagging' of addresses is used for foster carers where there is a risk of a child going missing or being re-trafficked.

Social work visits take place the same day or next day as the child protection investigation continues, while cases are processed through the Hampshire children's services and police MASH units who bring in health teams but also process the cases through to Willow and MET police quickly.

The focus of Willow is around safeguarding, building a durable solution into adulthood, and ensuring that a child's care needs are met through religion, education, language, culture and basic care needs. The approach aims to be in keeping with EU conventions and UK guidance. There is also trafficking specialist supported accommodation and specialist supported independent accommodation.

The two main challenges have been around mental health and placements. The team said they would welcome better joined-up access to mental health services around child trauma as well as better access to local foster care placements rather than having to place children outside Hampshire. There was also a broader challenge around being able to make foster care choices based on a child's needs rather than cultural aligning, or without sufficient opportunity to match carers with a child's needs due to needing to find a placement in emergency conditions. It was suggested that a reception centre might be a good way to bring together services for a short period.

Outcomes and learning points

The process meant a child-centred approach, where children could speak about their experiences in a safe environment, meaning it was easier for a child's immediate risks to be communicated and then highlighted to all professionals. It provided a quick insight into the child's experience and journey so that the risk of (re-)trafficking or other adverse experiences was better managed and a safety plan could be quickly put in place while a child was placed in the care of a family, offered safety and support, and provided with an alternative to running away.

London Borough of Harrow

Main modern slavery theme | Effective internal structures and work with external partners to tackle modern slavery

General context and approach

Harrow Council recognised that child trafficking, in particular child sexual exploitation (CSE), 'county lines' child criminal exploitation, missing children, gangs, anti-social behaviour, serious youth violence and radicalisation are often inter-related. As such, the approach to tackling it needed to be holistic and involve collaboration with partners. The key areas identified for improvement were: awareness of modern slavery, the risk factors which increase vulnerability, and a need to improve their information sharing and response.

In April 2016, the Violence, Vulnerability and Exploitation (VVE) team was established within children's services, with a primary focus on collaborative working across the key areas identified above.

Aims/objectives of work

The goal of the VVE team is to identify and respond to risks as early as possible. The team also helps to develop key themes and trends and improve the council's collective response through an informed understanding of the problem profile in respect of young people who go missing and experience harm.

VVE daily briefings commenced in June 2017, with the purpose of discussing all youth/gang related incidents in Harrow, preventing duplication of activity and ensuring the efficient use of resources. The meeting allows key partners to share fast-time information regarding areas and individuals/groups who present a risk or who are at risk. The meeting has proven effective in enabling all relevant agencies to make prompt and informed decisions, and initiate action to minimise

the risk of harm or of potential incidents. All incidents and actions are recorded, tracked and disseminated and help to develop a strategic response to VVE.

The council recognises that VVE is a dynamic issue and they cannot afford to be complacent. Its key priorities for 2019 are to:

- develop the council's response to trafficked children through a pilot with the voluntary sector organisation Every Child Protected Against Trafficking (ECPAT)
- strengthen engagement with the voluntary sector across Harrow (eg Ignite) and with local businesses and transport hubs, to improve the council's response to contextual safeguarding
- develop the partnership approach to CCE
- further develop Harrow's VVE problem profile.

What the council did/delivery approach

Harrow developed a partnership response to modern slavery, with the introduction of Violence, Vulnerability and Exploitation (VVE) daily briefings, which arose out of a review into community safety in which all partners recognised the need to improve communication and joined-up working.

The key partners contributing to the daily briefing include: the VVE team manager (who is the modern slavery SPOC) who connects with the missing children coordinator, and the Prevent and gangs coordinator. Alongside the manager, the MASH education lead, community safety officer in the police, the Youth Offending Team team manager and the police gangs coordinator also feed in to the daily briefings.

There was no extra funding made available to do this work, but there was a strong buy-in from partner agencies to be part of the daily briefing. All partner agencies signed an information sharing agreement to satisfy GDPR/data protection requirements.

The daily VVE briefing discusses youth/gang/ exploitation related incidents in Harrow (or involving Harrow young people), and all incidents and actions are recorded, tracked and disseminated and help to develop a strategic response to VVE. Where the briefings identify adults at risk of modern slavery (for example, the 'cuckooing' of vulnerable adults), this information is shared immediately with Adults Safeguarding.

The council was also involved in a government pilot, working with ECPAT UK, looking at their children's services around trafficked children. As a result of this pilot, the council implemented a register to identify and track children at risk of exploitation including: those in the process of an NRM referral or where an NRM conclusive grounds decision had been made; those who were suspected victims of modern slavery; those involved in gangs/child criminal exploitation and seen under the CSE/MASH work.

This enabled the council to immediately know at any given point how many children in Harrow were thought to be the victims or potential victims of trafficking and if NRM referrals had been made, and their outcome. The council also worked significantly to increase awareness across social work teams to recognise child exploitation and child trafficking indicators and improve the team's ability to identify a child at risk of trafficking or who had been trafficked. Work was also carried out to significantly increase awareness across social work teams of the 'duty to notify'.

The Romanian community is an important part of Harrow, with the borough having one of the largest Romanian communities in the UK. A need to strengthen safeguarding arrangements when working with Romanian nationals encouraged development of a partnership relationship with the Romanian

embassy, the Ambassador and key ministers in Romania. Development was led by senior leaders in Harrow.

In 2018, the Romanian Labour and Social Affairs Attaché in the UK and Ireland facilitated a meeting with Romanian ministers and senior children's social care leaders in Romania to develop a shared understanding regarding the issue of sexual and criminal exploitation of Romanian children in London. Developing a strong working relationship with the Romanian Embassy was a joint initiative between Harrow children's social care and the Romanian Embassy which share a commitment to safeguarding children and was unfunded.

Outcomes and Learning Points

The VVE team is located in the children's access service in close proximity to the MASH, which ensures that 'real time' intelligence and information is shared through these systems. In the Ofsted Inspection 2017, it was recognised that this approach to child exploitation was the most effective way of dealing with CSE and children/young people who go missing. Partners have also shared that prior to the formation of the VVE daily briefing, information-sharing was at times limited, disjointed and/or slow; the sharing of information relied heavily on personalities in roles rather than process.

The coordinated multi-agency approach has removed these blockages. The encouragement of efficient and effective information sharing has driven a number of successful interventions and disruptions involving violence, vulnerability and exploitation across Harrow.

The children's services database Mosaic has developed new registrations to monitor and track progress of young people where exploitation and modern slavery are identified. The daily VVE briefings uncovered that the young people discussed were known to different teams across the directorate. The use of specific vulnerability markers, ensures

that identified young people are being referred into the NRM and receiving a service which meets their individual safeguarding and support needs.

Increased awareness of modern slavery across Harrow is evidenced by a significant increase in referrals of Harrow's young people into the NRM. Referrals to the NRM increased during the year of the pilot working with ECPAT with 14 child NRM referrals submitted in 2018, compared to one child NRM in 2017. A streamlining of policies and procedures is also now underway.

Kirklees Council

Main modern slavery theme | Effective internal structures and work with external partners to tackle modern slavery

General context and approach

West Yorkshire was one of the areas chosen to pilot reforms to the NRM. Implementing the pilot processes promoted an increased partnership focus on modern slavery and put a spotlight on collaborative working in this area. Partnership working is key to Kirklees driving forward the modern slavery action plan, across all relevant departments within the council, as well as across the five local authorities within West Yorkshire.

The modern slavery agenda is strongly driven by the local police and crime commissioner (PCC), Mark Burns-Williamson OBE who is also the national PCC lead for human trafficking and modern slavery. He strongly supports collaborative working across the five local authorities, ensuring best practice is shared and processes implemented. West Yorkshire was also the first force to have their own dedicated modern slavery team; the first company owner convicted of a human trafficking offence under the Modern Slavery Act was based in Kirklees.

The West Yorkshire Anti-Trafficking and Modern Slavery Network coordinates collaborative working, in particular through quarterly events bringing together key individuals from West Yorkshire. The network was established to provide a strategic meeting framework for statutory, non-statutory and community and voluntary sector organisations in West Yorkshire.

Aims/objectives of work

The aim of the work is to ensure a collaborative approach to tackling modern slavery across all relevant organisations across Kirklees.

The focus is on early intervention and prevention: a significant amount of work has gone into raising awareness not only with council officers and partners, but also within communities, to ensure human trafficking and modern slavery signs are picked up and acted upon appropriately. The goal is to ensure everyone, from ward councillors (ensuring political support) through to the general public, recognises that we all share a collective safeguarding responsibility. This is supported through the recent corporate safeguarding policy, introduced after the NRM pilot began, which facilitates the system leadership and support needed to ensure everyone is clear what their responsibilities are.

What the council did/ delivery approach

Safer Kirklees (the community safety partnership) leads on the modern slavery strategy and action plan within Kirklees, with close cross-board working with both adults and child safeguarding boards. A modern slavery lead has been appointed.

The approach recently moved to a two-tier approach, initiating strategic and operational group meetings, each held quarterly. Attendees at each group comprise council officers, West Yorkshire Police, health partners, housing, immigration, probation and NGOs.

Strategic group members are senior enough to drive the agenda forward; operational group members are frontline officers ensuring that the actions within the action plan are carried out. The operational group focusses on case studies, partnership problem-solving and lessons learned, but also live cases and pulling together intelligence to support police investigations.

Monthly awareness-raising sessions take place in Kirklees, for professionals, students and volunteers who work/study in the area, with about 700 people trained so far. The training is facilitated by West Yorkshire Police's human trafficking training and partnerships officer who is able to bring realism to the sessions through knowledge of past and current cases. After training, the link to the police human trafficking e-learning is shared with attendees for use as an aide-memoire. The council also facilitates targeted and bespoke training sessions for specific groups of staff, for example first responders, those who work with local businesses and planning/building control, elected members and environmental health officers. It also offers specific child trafficking training to targeted groups.

The operational and strategic group meetings add another layer to this, in that all attendees ensure the correct messages and awareness is embedded within their organisations as well as ensuring they can help to problem solve/ offer solutions to individual cases.

Outcomes and learning points

Due to increased awareness, there has been a significant increase in soft intelligence reporting into the police portal and the modern slavery helpline. There is an improved collaborative partnership working approach; the West Yorkshire Police modern slavery single point of contact and the Kirklees modern slavery lead have developed a close working relationship whereby police intelligence is shared and a request for any information across wider council services is made better to inform future police actions.

The NRM process can prove challenging. The five-day reflection period for potential victims highlights a lack of funding and resources (specifically accommodation) prior to entering the NRM; this is further highlighted when victims exit the NRM, as they are often left vulnerable and open to re-exploitation due to lack of support and resources.

Partners with slightly differing agendas can also pose challenges, requiring negotiation. Changing processes and the ability to keep everyone informed in a timely manner is also challenging, although the implementation of networks should alleviate this. High staff turnover in some partners requires ensuring new staff have appropriate awareness.

London Borough of Merton

Main modern slavery dimension theme | Providing support to child victims

General context and approach

The work carried out by the council with anti-trafficking charity Love 146 was in response to an increasing number of unaccompanied minors located within Merton who were identified as potential or confirmed victims of trafficking. The close collaboration was borne out of learning from a specific case study in which a looked after child had gone missing from care despite an understanding that he was at risk of doing so.

The team manager of the 14+ team in Merton, who has primary responsibility for all unaccompanied minors, and the UK Director of Love 146 were the lead officers in the collaborative work to safeguard and support child victims of trafficking. So far over 12 cases have received direct support. All of these young people remain supported by Merton and Love146 and none have gone missing from care.

Aims/objectives of work

There were three overarching aims for the work:

- to improve frontline practice through flexible, sensitive intervention with children at high risk
- to build capacity/expertise within the sector so that responses were better informed and sustainably improved
- to keep children safe from harm.

This work sought holistically to address the particular needs of children trafficked into the UK, including recognising the need for robust safety planning, for specialist placements upon entry into care and to reduce the risk young people face from their traffickers once

in the UK over the long-term including when leaving care.

The council cited the following risks for the reasoning behind some of their work: 'A trafficked young person may still be at risk of exploitation from their traffickers on leaving care... Specialist accommodation should be considered, for example, in settings which specialise in dealing with victims of trafficking.' (Department for Education, 2014)

What the council did/delivery approach

Where a child is identified as a potential victim of trafficking, the partnership process involves referring cases to Love 146 for a specialist trafficking assessment. Safeguarding processes are also initiated in line with the Department for Education guidance Working Together to Safeguard Victims of Trafficking - for example, having a section 47 investigation alongside a care planing process. There would then be a referral to the NRM and the child would be given direct assistance in accessing legal support and provided with safe accommodation with a placement which has received specialist child trafficking training. The partnership will then design and develop a specialist child trafficking safety plan and, where necessary, an environmental risk assessment to inform any placement search and location. The council also allocates a Love 146 social worker to work alongside the Merton children's services social worker, with the Love 146 social worker carrying out direct support work with the young person.

This work is delivered through a number of processes and tools, including:

- trafficking assessment
- emergency safety planning process
- a personal safety device including GPS tracker, stored phone numbers for police and an emergency assistance button which sends a text to agreed numbers
- regular reviews of safety plans
- management of a safety plan reduction programme
- direct work with young people to assist them in identifying abusive/exploitative behaviour
- support for foster carers
- training of foster carers, social workers and managers
- provision of safe specialist accommodation
- transition planning: from care to independence, including provision of specialist semi-independent accommodation or staying put with foster carer post-18
- evaluation of services.

Outcomes and learning points

All cases with Love 146 are evaluated according to a series of outcomes using a specific matrix tool.

- A reduction in the level of risk/harm to a child victim of trafficking: to assist in safeguarding of young people from any risk/harm especially re- trafficking/ exploitation relate.
- Increased independence: building up young people's independence from a trafficker (or other people's) control and increasing chances for young person's long-term recovery and safety.
- Recovery from bereavement/trauma: recognising high prevalence of psychological trauma among trafficked

young people and the effect this can have in placing a young person at risk of further harm (decreased sense of self-worth; less care for safety; increased vulnerability to exploitation).

- The development of healthy and trusting relationships.
- The ability to identify abusive/exploitative behaviour: increasing chances for a young person's long-term recovery and safety – owning ways of keeping themselves safe which they can apply in the future.
- The ability to describe safety strategies.
- Stable and secure accommodation: increasing stability and connection to placement/non-exploitative life; reducing risk of absconding and/or returning/running to traffickers.
- Increased awareness of rights: ensuring young people are aware of the ways the law protects them; can identify situations where the law is not being followed and know correct ways to challenge such situations/access support (without instead seeking support of potential traffickers/exploiters).

All cases demonstrated improved outcomes between the date of coming into contact with Merton children's social care and time of evaluation, including no children involved going missing from care.

The benefits of collaboration on particular cases and the close working relationship with Love 146 led to a number of additional benefits. Managers, social workers, personal advisers and foster carers have reported increased understanding of, and confidence in, dealing with the potential victims of trafficking. Since collaborating with Love 146 no potential victims of trafficking have gone missing from care. Moreover, the profile of needs of child victims of trafficking from outside the UK has been raised within the borough and shifted from an immigration to child welfare concern.

Challenges included the issue of funding – for example the increased cost of semi-independent accommodation placements and additional support costs for foster placements within the context of local authority budget cuts. There were also deprivation of liberty concerns in implementing safety plans and there were some difficulties for foster carers and social workers in maintaining the safety plans required to effectively protect children at significant risk. Another challenge was implementing a cultural change in some partner agencies to address issues in a trauma-informed safeguarding approach rather than through the prism of immigration and a ‘culture of disbelief’. Different organisations also had their own priorities and processes which caused delays in some cases.

Learning points include the need to build on current partnerships with local education provisions to support the safeguarding of Merton young people in education, especially when on a safety plan, including developing case working partnerships with colleges and FTE providers where a young person is subject to a safety plan. It also became clear that regular reviews of the safety plan involving relevant agencies are needed. A final learning point was the need for additional training for senior managers and commissioners on the needs of trafficked children to achieve understanding of why costs may be higher than average in order to protect them from harm.

Newcastle City Council

Main modern slavery theme | Providing support to adult victims

General context and approach:

Newcastle City Council has an overarching modern slavery, trafficking and exploitation (MSTE) strategy which sets out the roles and responsibilities of the various directorates in the council and partner agencies.

It was identified that whilst services both within the council and with partner agencies had worked together effectively in police-led operations responding to MSTE, there needed to be a robust plan for when a response could be business as usual and when there needed to be a more bespoke approach. This reinforced to the council that it had a role to play not just in identifying victims of trafficking, but also in terms of supporting victims once identified – particularly in the pre-NRM period.

The council recognised that it may be expected to provide emergency accommodation for up to five working days after identification of a potential victim (before an initial referral is made for them to enter the NRM) or in cases where an individual declines to enter the NRM. A plan was therefore needed to ensure provision would be in place if large numbers of victims were identified in any planned operations.

Aims/objectives of work

The council decided that it needed to adopt a tried and tested victim strategy, where the priority of all agencies; centred on the safeguarding and support for victims, regardless of whether they go on to provide an evidential account; recognised the requirement to not only house but support people who have been made homeless because of MSTE; and acknowledged the impact MSTE support has on council budgets and resources.

The challenge was to manage the complexity of the survivor's personal circumstances and determine the unclear interaction between homelessness legislation and new legislation around MSTE within homeless and safeguarding guidance, and then be able to identify appropriate emergency accommodation.

More broadly, support needed to be considered in terms of:

- immediate support, from the time a victim is found up to 72 hours after
- short term support, where a victim may need support until they enter the NRM, or until health/community care/housing assessments can be carried out
- medium term support, where a victim needs a place of safety until a longer-term placement/accommodation can be sourced
- longer term or ongoing support and longer term resettlement or support in the community.

What the council did/ delivery approach

A multi-agency approach (with NHS England, police, British Red Cross and council services such as strategic housing, safeguarding and domestic violence teams, homelessness housing advice team and the resilience planning team, the fire and rescue service, teams working with migrants and environmental health, etc) has been adopted when supporting victims, so all partners are consulted through operational planning meetings to determine the most appropriate use of their services.

Newcastle's adult social care service has also developed a procedure for staff in relation to the pathways they need to follow in response to modern day slavery, should the need arise.

This response covers both in and out of hours (EDT) services. The council has an agreed hierarchical strategy for all those who present as victims of MSTE. The accommodation type and layout is integral to delivering this victim centred strategy. These are based on:

- initial and ongoing safeguarding within either a victim reception centre or specialist accommodation
- support from all appropriate agencies to identify and address social care, health and welfare needs
- providing evidence for prosecution through the completion of achieving best evidence (ABE) interviews in a supportive environment.

Three accommodation models have been explored and used to date:

Homelessness accommodation – though this has not always been available as it is in high demand, not designed to support a multi-agency approach and many victims of MSTE may not be deemed as being statutorily homeless.

The second option was unoccupied council housing stock, which provided dormitory style accommodation with beds, a communal area, showers and multiple ABE suites. Although this accommodation was suitable for certain situations, it was deemed unsuitable for victims who have additional vulnerabilities or have experienced additional trauma.

The council also had self-contained flats. This option worked but the council felt that they could do more and provide more appropriate alternative accommodation. Long-term low demand void properties were identified within existing council housing stock and were allocated to support the council's MSTE response.

As MSTE operations often cross boundaries a memorandum of understanding was established between two local authority areas to allow all victims, irrelevant of location to be housed in the Newcastle victim reception centre.

Outcomes and learning points

The current accommodation plans described above are only a short-term option and the council believes improvements can be made and are looking for alternative accommodation. This will be developed with all partners including other regional councils to identify a victim reception centre that can be a fully utilised resource that offers a flexible approach to victim accommodation and support, whilst ensuring the police can achieve best evidence.

Most, if not all, victims of MSTE are living with a vulnerability that enabled the traffickers and enslavers to enter into their lives, persuade them to change their lives/jobs/ area/ country and ultimately prevent them from leaving or seeking help. It is unlikely that their experience of exploitation reduced this vulnerability and it is probable that not only was this initial need not met, but additional levels of vulnerability were introduced and exploited. It is important that social and health care assessments are carried out as soon as possible so ongoing need and eligibility can be identified.

Whilst there are numerous interrelating and occasionally overlapping legislative and policy documents in relation to modern day slavery, none of these options provide an all-encompassing framework for multi-agency responses to modern day slavery, including both short-term operational responsibility, through to longer-term support for people who have been victims of modern day slavery.

Victims do not have to seek support within the NRM, it can be provided by local agencies if this is seen to be more suitable. However, there are limitations on what it can provide:

- the council has experience of placements breaking down and the NRM being unwilling to give victims a second chance or the NRM supporting victims (even those with conclusive grounds) who can be asked to leave the placement with little notice
- the NRM cannot guarantee to provide residential support for families who have experienced trafficking and exploitation
- there is no agreement where a victim's local connection is on leaving the NRM and there is no additional funding for agencies to support people once they leave.

There are therefore concerns about local agencies having to fund the care and housing of victims who are eligible under modern day slavery legislation but who may not meet the criteria for homelessness legislation, safeguarding or social care criteria.

Whilst the NRM process provides an important period of short-term security, the current legislative options available provide no clear solution to ensuring that survivors of modern day slavery receive appropriate long-term support. Without longer-term support mechanisms in place post-day 45 of the NRM period, there is a danger that survivors of modern day slavery will disappear from the radar of support services and fall back into the risk of exploitation.

The need for suitable accommodation beyond the 45-day NRM period is a particular challenge for people who may have no recourse to public funds and where it may have been determined via the NRM that there is no conclusive evidence that the person has been victim of modern day slavery. There is a duty to provide accommodation to people who have received a positive reasonable grounds decision via the NRM.

For all survivors, the instability of the housing situation can have a detrimental impact on their health and social care needs, ranging from the psychological impact of the periods of change and disruption through to the risk of losing relationships with trusted professionals in health and social care.

Specialist support needs for victims of modern day slavery can range from care and support needs through to legal advocacy. There may be a disparity between the support that someone received during the NRM and the period immediately after the NRM. Survivors of modern day slavery, regardless of the conclusion of the reasonable grounds decision may or may not meet the statutory criteria for support from adult social care. In addition, there is no statutory requirement to provide advocacy for survivors during or after the NRM period.

A stable immigration status can be closely linked to a survivor's likelihood of long-term recovery, especially given the significance of immigration status in relation to housing entitlement. The time taken to reach a decision around eligibility to remain can also impact upon a survivor's employment prospects. There can be a significant gap in time between receiving a positive conclusive grounds decision and a corresponding leave to remain decision. This can subsequently impact upon the person's ability to access mainstream and housing benefits.

Nottinghamshire County Council

Main modern slavery theme | Ensuring supply chains are free from modern slavery | Effective internal structures and work with external partners to tackle modern slavery

General context and approach

In January 2017 Nottinghamshire County Council voluntarily produced its first annual modern slavery statement (relating to the section 54 of the Modern Slavery Act 2015 requirements for private businesses) and each service area within the council was charged with assessing the need to evaluate the risks of modern slavery related to its operations. That spring, the council's deputy corporate director of adult social care began talks with researchers from the University of Nottingham's Rights Lab, a research group dedicated to eradicating modern slavery by 2030.

A wide-ranging, multiple stakeholder, evaluation began. The Rights Lab began by conducting a series of detailed interviews with managers from the council, local residential care and nursing homes, their agencies and direct payment support service providers. Participants included managers from procurement, market management and human resources. As the project progressed, council managers and staff engaged in direct payment services became actively engaged in developing solution-orientated action plans.

Concerns about modern slavery risk in the care sector have been voiced by Sir David Metcalf, the former Director of Labour Market Enforcement, Stephen Chapman, the Welsh Anti-Slavery Coordinator and in research from Professor Gary Craig and Dr Caroline Emberson. Furthermore, the interviews conducted by the Rights Lab brought to light several examples of questionable practices. Managers expressed particular concerns about modern slavery risks in the delivery of Nottinghamshire County Council direct payment care services.

Aims/objectives of the work

In line with the commitment in the council's voluntary transparency in supply chains statement, the adult social care service wanted to assess the risk of modern slavery occurring within the service's supply chains, and take steps to address any risks that were identified.

What the council did/delivery approach

This was a phased project. Following the initial interviews, a survey questionnaire was designed and distributed to over 300 Nottinghamshire-based residential care and nursing home providers. This was followed by the development of a solutions-based workshop co-delivered with the Midlands-based anti-slavery NGO 'Hope for Justice'.

Nottinghamshire County Council and the Rights Lab were able to build a productive working relationship. The Rights Lab provided expertise in conducting both qualitative interviews and quantitative survey research. This collaboration also enabled the council to access a research grant to fund development of its own managers and the delivery of local community workshops in urban and rural Nottinghamshire.

Outcomes and learning points

This work has improved understanding of the modern slavery risks in adult social care among council managers and staff, and the managers of its upstream, supply chain residential care and nursing home and direct payment support service providers.

Direct payment review procedures have been strengthened. For example, Nottinghamshire County Council processes now include: the recommendation to direct payment recipients to make payments into the named accounts of their personal assistants; the registration of each direct payment personal assistant on the council's internal systems, and capture of the name of agencies used within individual direct payment recipients' support plans. In addition, the council's frontline staff now ask recipients to inform them of any changes to personal assistants as part of its annual review process.

The council had already built modern slavery questions into its Crown Commercial Service contracts yet managers did not consider this sufficient to ensure adult social care supply chains were slavery-free. Risks were identified upstream in the agencies used to supply temporary staff to cover holidays and unexpected absenteeism. The council's own quality audits offered a mechanism for uncovering and scrutinising any questionable practices.

In the case of direct payment services, informed consent in line with General Data Protection Regulations (GDPR) needs to be obtained if advances in the capture of personal assistants' information are to be made. Also, legal advice suggests that it is not possible to impose a duty or obligation on direct payment recipients to pay personal care assistant's salaries into their bank accounts – this may only be a recommendation.

Nottinghamshire County Council sponsorship and personal contact were required to ensure the engagement of busy residential care and nursing home managers. Direct payment personal assistants were often socially and geographically isolated. Reports indicated that some unscrupulous agencies targeted their services at rural communities to exploit these vulnerabilities. Yet attempts to engage local parish councils and community and voluntary sector groups in rural areas proved difficult for the team, with work to do to ensure that modern slavery in care is given the priority it requires to avoid the risk of localised instances of slavery being hidden in plain sight.

Sandwell Metropolitan Borough Council

Main modern slavery theme | Effective internal structures and work with external partners to tackle modern slavery

General context and approach

Sandwell Council worked with a range of partners to develop the strategic anti-slavery partnership. The group developed an understanding that many victims of exploitation are accommodated within privately rented housing and that there was a need to have focused work to enhance protection for the most vulnerable and diverse sections of the community, both adults and children. The partnership created SHOP (Sandwell housing operational partnership) which sits alongside the annual strategic partnership to share information on potential modern slavery situations. The operational forum provides a forum for a multi-agency discussion and intelligence sharing on potential modern slavery situations.

Modern slavery is a priority on all four of Sandwell's strategic boards, including the safeguarding children and adults boards, health and wellbeing board and the Safer Sandwell Partnership and police crime board.

Sandwell also has a designated modern slavery and human trafficking programme manager who coordinates the council's work around modern slavery and human trafficking.

Aims/objectives of work

To coordinate work on anti-slavery in the council's area by:

- increasing intelligence sharing between partners
- using intelligence sharing to:
 - identify and assist exploited individuals
 - prosecute perpetrators

- create an understanding of trends within Sandwell to shape priorities
- prevent future exploitation
- facilitating partnerships and relationships between both partners and individuals within and outside of meetings
- developing a proactive strategy and opportunities to prevent exploitation, for example group inspections and Day Out projects.
- developing an understanding of each agency's powers in order to work together effectively
- promoting effective partnership between other staff within local, subregional and regional partnership organisations.
- sharing reports/information with the West Midlands Anti-Slavery Network as appropriate.

What the council did/ delivery approach

The partnership – SHOP – was set up in 2017 by West Midlands Police and Sandwell Council's private rented sector housing quality team, bringing together agencies involved with vulnerable individuals and the private rented sector housing tenure. Strong relationships have been forged within and between these agencies to protect victims, identify perpetrators and offer disruption on at-risk premises. SHOP acts as an umbrella for a virtual team, which provides a coordinated approach to quickly share information, assess need and risk and determine the most effective response; and a response team which provides effective planned collaboration, initiating a tactical plan

to enable maximum disruption, prosecution and victim support.

SHOP thus combines the powers, skills and tools from West Midlands police and fire services, the local authority, Immigration, HMRC, the Gangmasters and Labour Abuse Authority, trading standards, water waste management, National Grid and Hope for Justice, a prominent local NGO.

Monthly meetings provide a platform for the group, intelligence of concern is identified and shared with the group within agreed information sharing protocols. Agencies undertake research on their own systems and then attend multi-agency meetings to share their findings; this intelligence is identified and assessed at the earliest opportunity. Following a risk assessment and research, it is then identified how best to target and disrupt the activity utilising the 'virtual team' members. With safeguarding at the forefront, a unique and creative tactical advice plan is constructed as guidance for execution. The operation can then be discussed at the monthly tactical partnership meeting or initiated dynamically in quick time if the need arises. Utilising the multi-agency virtual team distribution list, a date and time for coordinated responsive action can be set within hours. The team will then very quickly execute the planned joint operation utilising all the skills and enforcement opportunities on hand. Phase one is led by the police, phase two by the responder.

This approach has resulted in a substantially enhanced positive outcome rate at such operations including victim identification and rescue, arrests and the closure/prohibition of both commercial premises and properties. One example of specific community-based work involved a disruption at a local factory. Several adults were identified as being vulnerable and attending a local Gurdwara.

A new training programme has also been developed covering, to date, almost 600 staff from various organisations.

Outcomes and learning points

In terms of outcomes on the ground, 47 planned disruption operations have been undertaken over the last 12 months. The planned activities involved 19 agencies providing a total of 126 disruption interventions. Of these 47, 35 involved labour exploitation, nine sexual exploitation, five domestic servitude and one criminal exploitation. Nine brothels and six car washes were targeted. Ten arrests have taken place, three arrests for human trafficking/modern slavery, and seven under immigration legislation. These operations continue.

An increasing number of victims have been identified, rescued and placed within the NRM, including adult men, women and children; and a significant number of prosecutions have taken place or are likely.

In terms of learning, it would have been important to have better outcome measures and statistics from the start; this issue has now been embedded and improvements are expected. An effective system for tracking victims would also be beneficial. It is difficult to see how many victims the 47 planned operations relate to, how many were adults/children, how many were referred into the NRM/Duty to Notify, and the victim pathways. The victim pathway system has now been developed and this will improve monitoring.

Stevenage Borough Council

Main modern slavery theme | Effective internal structures and work with external partners to tackle modern slavery

General context and approach

A victim of modern slavery came to Stevenage Borough Council from out of area and asked for support. It was initially thought she was a victim of domestic abuse, but following an interview, it was clear that she had in fact been a victim of modern slavery. However, it became apparent that although there was some support available in the county, it was not easily accessible to the client, and that it was impossible to access one-to-one support and advice quickly and locally. Stevenage Borough Council made the decision to set up its own modern slavery service to support victims, offer advice and ensure that all members of staff and contractors have awareness training. All of the council's frontline staff had received some modern slavery awareness training from Operation Tropic (a Hertfordshire Police led county-wide partnership) so were aware of the basic signs to look out for.

Aims/objectives of work

At the same time, the council signed up to the Co-operative Charter and decided that it needed to have a service with support for those people requiring help and advice around modern slavery. To facilitate this outcome, the domestic abuse team did some extensive research into modern slavery to determine exactly what the issues were around, what to look out for, what services were available and how the council could work most effectively as a first responder.

What the council did/delivery approach

The council began by developing a service flow chart to ensure the correct procedure was taken each time it was presented with a victim in the future.

It has now produced an action plan which is managed through the joint action group (JAG) and the responsible authorities group (RAG) with partners (the SoSafe community safety partnership) and by the council. The lead officer is Stevenage's community safety manager and the chair of RAG is Stevenage Borough Council's chief executive. Out of this, and in partnership, the council developed the modern slavery service. The council has also introduced an awareness programme for staff and contractors which is part of their induction into the organisation, and further more in-depth training for frontline staff. The council is now fully aware of the importance of partnership working and the benefit this has, working throughout in conjunction with Operation Tropic, the modern slavery helpline and The Salvation Army in particular.

The partnership has developed leaflets, posters and business cards to raise awareness and promote the services available in Stevenage. These have been distributed to all local estate agents, hotels, taxis, schools and other public places around the town. The partnership is also starting to translate the information available to different languages, to again help to promote the service and raise awareness, but also to help some of the language barriers that member organisations face.

Stevenage Borough Council works collaboratively with Hertfordshire County Council regarding the development of strategic plans and how it incorporates them into its day-to-day working. It is essential that as a local authority it involves partners in shaping any new service and in reviewing its outcomes. Strategic partners meet on a quarterly basis as part of the SoSafe partnership and other partners meet every six weeks to discuss referrals to the service, concerns and to share information/intelligence. At these meetings there is a cohort of over 30 partners signed up to attend. Partner agencies can themselves bring cases to discuss and any concerns they have about an individual or a family.

One key insight was to recognise the key role that housing teams at the council could play with their specialist advice and knowledge, and these services are now an important partner.

Outcomes and learning points

The outcome of this service is that in future the council should be able to help anyone else who seeks support on this issue. That first encounter was a very difficult experience for the council team, as they felt they were unable to support the first victim of modern slavery that they had encountered. The council now feels in a position to help victims to access support and advice. This is partly through ensuring that employees have the right training and are confident in recognising the signs of modern slavery. However, the service will continue to develop and involve more local businesses and partner agencies, and professionals and businesses were the target for a modern slavery conference earlier this year.

If Stevenage were to give advice to another authority setting up a service it would recommend that it has a small but flexible budget available – this has been essential in purchasing toiletries, purchasing a mobile phone, payment for travel expenses and for emergency accommodation.

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