

Independent Anti-Slavery Commissioner

Annual Report for the period 1 August 2015 to
30 September 2016

Presented to Parliament pursuant to Section 42 (10) (b) of the Modern Slavery Act 2015

October 2016

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Foreword by Kevin Hyland OBE

Independent Anti-Slavery Commissioner



With the introduction of the Modern Slavery Act and the passing of legislation in Scotland and Northern Ireland to tackle human trafficking and exploitation, the United Kingdom has made a clear commitment to be a global leader in the fight against modern slavery.

Prime Minister Theresa May's creation of a new task force cements this resolve, with senior leadership directed to prioritise combating what she rightly views as "the greatest human rights issue of our time". I applaud this development, and look forward to further work with partners - both domestic and international - to ensure that the highest standards of victim identification and care, law enforcement action and, crucially, prevention, are delivered.

This report outlines achievements delivered under each of the priority areas identified in my Strategic Plan 2015-17, which I am now half way through. Although significant progress has been made in the fight against modern slavery, with more victims identified and more criminals convicted, there is still much to be done to ensure best practice across all agencies.

For the UK to achieve its ambition of being the global leader in combating modern slavery, I am focused on pushing the delivery of a first class response across the UK and ending the exploitation that takes place on our streets and in our farms, factories and private homes. We must have support systems which focus on victims' needs, law enforcement that treats modern slavery as serious and often organised crime, partnerships that impact the whole country and businesses that measure their success by the ethical treatment of their workers.

My first priority is **victim identification and care**. In 2015 (3,266), 40% more potential victims were referred for support to the UK Government funded National Referral Mechanism (NRM) than in 2014 (2,340)¹. Yet these men, women and children are just the tip of the iceberg. I want to see more victims being identified, referred for appropriate support and restored of their freedom.

"At the moment there are too many gaps in the system for victims to fall through"

At the moment there are too many gaps in the system for victims to fall through. Many frontline organisations work tirelessly to support victims, but it is unacceptable that nothing is known about victims' futures once they leave support accommodation; whether they are successfully reintegrated into society and gain control of their lives; or whether many are failed because support ceases so abruptly. It is time to review this support system and to ensure that victims receive support tailored to their individual and complex needs.

We owe it to victims of modern slavery to continue to improve the **law enforcement and criminal justice** response domestically and internationally. High financial profits and a historically low risk of successful prosecutions make modern slavery an attractive enterprise for criminals. The number of modern slavery prosecutions and convictions in the UK are on the rise. In 2015, 117 offenders were prosecuted for modern slavery offences in the UK, 19% higher than the 98 prosecuted in 2014².

¹ <http://www.nationalcrimeagency.gov.uk/publications/676-national-referral-mechanism-statistics-end-of-year-summary-2015/file>

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/542047/2016_07_31_Haughey_Review_of_Modern_Slavery_Act_-_final_1.0.pdf

While this is encouraging, the total number of individuals being brought to justice is still relatively low given the estimated scale of offending. Disruption of criminal networks must therefore be a key priority.

“This is the great human rights issue of our time”
Prime Minister Theresa May, 2016

Evidence I have collected does demonstrate that some UK police forces are taking a proactive approach to combating modern slavery through the development of bespoke units, quality assurance mechanisms and training. I am disappointed however, that many instances of substandard modern slavery crime recording remain. This is underlined by data which shows that in 2015/16 only 884 modern slavery crimes were recorded, compared to 3,146 referrals to the NRM during the same period (see appendix). When NRM referrals are not recorded as crimes, investigations are not launched and victims do not receive the justice and support that they both need and deserve.

I raised this issue with the Director General of the National Crime Agency and the National Police Chief Councils’ lead for modern slavery in early 2015. The National Crime Agency (NCA) must play its role here, since it is the only agency that holds all NRM referral data³, including not only forces’ NRM referrals but crucially those made by other First Responders in their police force area. To date the NCA has remained somewhat passive in partnering with the police to ensure that all NRM referrals made by non-police First Responders are considered by the appropriate police force and that victims’ unique reference numbers are shared for inclusion in crime records. Opportunities have also been lost to mine NRM data for the benefit of intelligence and investigative opportunities. While this sensitive information should principally be used

for the support and care of each victim, a failure to analyse it for trends means that the evidence-led policing and preventative programmes that are so urgently needed cannot be developed to full effect.

Strong **partnerships** are a key ingredient to an effective modern slavery response. Consequently, I have worked to establish partnership relations with organisations from relevant sectors - including diaspora organisations, homelessness charities, and organisations supporting vulnerable migrant workers - to help inform and improve a holistic response. I have also promoted a multi-agency approach that I believe is crucial in order to ensure that victims receive comprehensive support to address their needs, and that perpetrators are arrested and prosecuted. There are some excellent models of modern slavery partnerships across the United Kingdom, led by committed individuals, and I thank them all for their innovation, dedication and collaboration.

The role that the **private sector** can play in tackling modern slavery, within the UK and across the globe, cannot be underestimated. Section 54 of the Modern Slavery Act, with its reporting requirement for large businesses operating in the UK, has forced the business community to discuss the topic of slavery openly to an extent that has not occurred since the days of the 19th century abolitionists. While the Modern Slavery Act has undoubtedly pushed modern slavery up the agenda and into the boardrooms of large businesses, this is just the first step. There is still much more to be done to ensure that companies produce statements that both comply with the Act’s obligations and point to decisive action being taken, as opposed to merely being a ‘tick box’ exercise. Here the role of consumer and investor pressure is crucial. I will be promoting the utilisation of effective models to allow for easy scrutiny and comparison of statements.

³ Including victims’ unique reference number (URN), which should accompany each police crime record

There have been important advances in **international** efforts to tackle modern slavery over the past year. In 2015 I led a successful international effort to secure an explicit target in the United Nation's development agenda for 2015-2030, agreed by all 193 Member States, to take immediate and effective measures to eradicate modern slavery and human trafficking. This has already started to bring more focused action, political will and increased funding to the fight against modern slavery globally. The Prime Minister has announced the creation of a new £33.5 million fund from the UK's aid budget to work with partner countries to achieve the UN target. Over the past year I have developed recommendations for targeted action in high-risk countries from where high numbers of victims are trafficked to the UK. I am pleased that in September the UK Government committed £5 million to tackle human trafficking from Nigeria, including working in Edo State, Nigeria's trafficking hub. I also strongly welcome the Secretary of State for International Development's recent statement that modern slavery will be a priority for her department, particularly given that since my appointment I have pushed for modern slavery to be given greater priority within UK aid programmes and humanitarian responses.

I am clear that for upstream prevention activities to be effective they must be built on a solid evidence base. Currently, there is a lacuna in understanding around what preventative interventions 'work' and around traffickers' '*modus operandi*'. I will continue to encourage work promoting research led approaches to preventative programming and planning.

I have been humbled by the work of partners, in the UK and beyond, who are striving to end modern slavery - all of whom have my full support. Modern slavery is a gross injustice. It is a violation of human rights that impacts millions around the world and it is a reality that affects thousands in the UK. Until all in society acknowledge the damage this crime causes and the role it plays in our everyday life, the suffering of men, women and children across the United Kingdom and beyond will continue.

"I have been humbled by the work of partners, in the UK and beyond, who are striving to end modern slavery-all of whom have my full support"

Victims of modern slavery are robbed of their right to life and liberty. The children working in the mines of the Democratic Republic of Congo to produce cobalt for smartphone batteries. The Eastern European men exploited in shocking conditions in car washes across the UK. The young girls trafficked to work as tea pickers in the fields of Assam. The domestic slaves abused in wealthy London residences. The Nigerian women and girls trafficked across the Sahara to work as sex slaves in Europe. These are all individuals – someone's mother, father, brother, sister, daughter or son – with a freedom and a future that must be fought for. Ending their suffering requires a coordinated national and international response across law enforcement, civil society, international development, humanitarian work and the private sector.

It is my mission as the Independent Anti-Slavery Commissioner to ensure that this response is delivered.



Kevin Hyland OBE
Independent Anti-Slavery Commissioner

The role of the Independent Anti-Slavery Commissioner

Part 4 of the Modern Slavery Act 2015 established the role of Independent Anti-Slavery Commissioner. The Commissioner has a UK-wide remit to encourage good practice in the prevention, detection, investigation and prosecution of modern slavery offences and the identification of victims. The role was created to spearhead the UK's fight against modern slavery⁴.

The following public authorities are under a duty to cooperate with the Commissioner:

- Chief officers of police for police areas in England and Wales and the chief constable of the British Transport Police Force;
- The National Crime Agency;
- An immigration officer or other official exercising functions in relation to immigration or asylum;
- A designated customs official;
- Local government;
- Health bodies including National Health Service trusts, NHS foundation trusts and Local Health Boards; and
- The Gangmasters Licensing Authority.

The Commissioner may request any of these specified public authorities to cooperate with the Commissioner in any way that the Commissioner considers necessary for the purposes of the Commissioner's functions. A specified public authority must so far as reasonably practicable comply with a request made to it.

Kevin Hyland OBE was appointed as designate Independent Anti-Slavery Commissioner in November 2014 and after the Modern Slavery Act received Royal Assent his role was confirmed on 31 July 2015. In October 2015, to coincide with Anti-Slavery Day, the Commissioner published his first Strategic Plan⁵, for the period 2015-2017, which focused on five priorities to galvanise the UK's response to modern slavery:

1. Ensuring improved identification and care of victims of modern slavery;
2. Driving an improved law enforcement and criminal justice response;
3. Promoting best practice in partnership working;
4. Private sector engagement to encourage supply chain transparency and combat labour exploitation; and
5. Encouraging effective and targeted international collaboration.

⁴ The term 'modern slavery' encompasses human trafficking and slavery, servitude and forced or compulsory labour, which are the terms used in Scotland
⁵https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/468729/IASC_StrategicPlan_2015.pdf

The Commissioner's Advisory Panel

The Commissioner has created an advisory panel, comprised of the following experts from a wide range of professions, whose experience he is able to draw on as a group in quarterly meetings, and individually, on their areas of expertise.

Sir Matthew Baggott CBE, QPM

Former Chief Constable, Police Service Northern Ireland

Eamonn Doran

Partner, Linklaters

TJ Birdi

Executive Director, Helen Bamber Foundation

Gillian Rivers

Partner, Penningtons Manches LLP; Chair to the Family Law Committee of the IBA

The Rt. Hon. Baroness Butler-Sloss GBE

Co-chair of All Party Parliamentary Group on Human Trafficking and Modern Slavery

Sandra Horley CBE

CEO, Refuge

Francis Campbell

Vice Chancellor, St Mary's University

Monsignor Marcelo Sánchez Sorondo

Chancellor, Pontifical Academy of Sciences and Pontifical Academy of Social Sciences

Michael Clarke

CEO, The Passage

Yasmin Waljee OBE

International Pro Bono Manager, Hogan Lovells

Message from the Chair: *The Rt. Rev. Dr. Alastair Redfern, Bishop of Derby*

"In a ground breaking first year the Commissioner has been able to establish widespread networks to improve policies and practices – both nationally and internationally. The international perspective is especially vital because modern slavery knows no boundaries, and often profits from the overly narrow focus of those seeking to challenge this wicked crime.

This initial year has also seen effective collaboration with a range of civil society organisations across a vibrant third sector, crucial work to help ensure further advances in the law enforcement response, and efforts to support the increasing determination of businesses to play a key role in combating modern slavery.

Much remains to be done and I know that the Commissioner will continue to prioritise important changes to better support victims, ensure increased prosecutions of traffickers, and put in place a fully joined-up approach that looks to prevent these awful crimes.

It is a privilege to be part of the Commissioner's Advisory Panel. As a panel we look forward to offering our support to the exciting work emerging as a consequence of the firm foundations put in place during an extremely productive and successful first year."

YEAR IN REVIEW

IASC leads international efforts to secure a clear target in the UN Sustainable Development Goal dedicated to the eradication of modern slavery.

Sept
2015



IASC meets with stakeholders in Edo State, Nigeria's trafficking hub, to develop recommendations submitted to the Home Secretary aimed at tackling the trafficking of women & girls to Europe. In September 2016 the Prime Minister announces that at least £5 million will be spent in Nigeria, particularly in areas such as Edo State.

Oct

IASC visits Vietnam to strengthen relations with authorities and NGOs in order to tackle the exploitation of Vietnamese nationals in the UK and commissions a piece of research to enable development of effective targeted responses.

IASC secures the secondment of a Romanian official to enhance strategic collaboration to tackle modern slavery involving Romanian victims and offenders which has resulted in unprecedented levels of cooperation.

Nov

Jan
2016

IASC collaborates with the Independent Chief Inspector of Borders to launch an inspection into Border Force's identification and treatment of potential victims of modern slavery at the UK border.

Jul

Aug

IASC analyses data returns requested from 43 regional police forces in England and Wales, the British Transport Police, Police Scotland and Police Service Northern Ireland. Findings reveal failings in the recording of modern slavery crime in England and Wales which the Commissioner is working to ensure are urgently rectified.

May

IASC visits Italy and Greece and later provides advice to the UK Government on what more can be done to ensure unaccompanied children and vulnerable adults are protected from traffickers who are exploiting the migrant and refugee crisis.

Apr

IASC commissions The Passage, a homelessness charity, to produce a report on the risks of modern slavery within the homeless sector and recommendations for how the sector can improve safeguarding responses.

Sept

The House of Commons Work and Pensions Select Committee announces an inquiry into access to benefits for modern slavery victims following IASC's letter to the chair of the Committee, Frank Field MP, which highlighted the lack of support available to victims when leaving safe houses and provided recommendations to improve the situation.

Oct

IASC, together with NHS England and South East England Councils, launches awareness videos for local councils, emergency services and NHS to educate frontline staff on the indicators of modern slavery and pathways to follow when incidences are suspected.



Key Achievements

2015 - 2016



Developing awareness raising and training for local authorities and the health sector

Multiple agencies often have both an opportunity and the responsibility to identify, refer, and provide care to victims of modern slavery in the UK. Those working in local authorities and the health sector can play a particularly important role. The Commissioner believes that all frontline professionals must be appropriately trained to ensure that vital opportunities to identify, assist and support victims of modern slavery are not missed, and that best practice procedures are followed.

Victims of modern slavery often come into contact with healthcare services both during their captivity and after their escape⁶. According to a recent study conducted by academics at King's College London's Institute of Psychiatry, Psychology and Neuroscience, 1 in 8 NHS professionals who participated had been in contact with a patient they knew or suspected had been exploited in modern slavery⁷. Unfortunately, only a small number reported that they knew how to respond appropriately.

1 in 8 NHS professionals report having been in contact with a patient they knew or suspected had been exploited in modern slavery.

In 2015 the Commissioner therefore commenced discussions with the Director of Nursing and the NHS Lead for Safeguarding to develop a more effective response within the NHS including tailored training for their staff.

Since then, the Commissioner has been working with South East England Councils and NHS England to produce a modern slavery awareness raising tool, in the form of three videos, for local councils, emergency services and NHS staff. The videos highlight the signs and symptoms of modern slavery and the vital role frontline professionals have in identification of victims in their daily work. The videos will be launched in October 2016 to coincide with UK Anti-Slavery Day⁸. The NHS video will be included in training and awareness packages for all nurses and clinicians in England and has the potential to reach up to 700,000 frontline staff.

The next step will be the provision of multi-agency training materials on modern slavery for health professionals, police officers and local councils, which will be developed jointly between NHS England, the Helen Bamber Foundation and King's College London.

⁶ Access to and experiences of healthcare services by trafficked people: findings from a mixed methods study in England, [https://kclpure.kcl.ac.uk/portal/en/publications/access-to-and-experiences-of-healthcare-services-by-trafficked-people-findings-from-a-mixed-methods-study-in-england\(9f086e6f-1d83-48da-b0ca-01a77c671104\).html](https://kclpure.kcl.ac.uk/portal/en/publications/access-to-and-experiences-of-healthcare-services-by-trafficked-people-findings-from-a-mixed-methods-study-in-england(9f086e6f-1d83-48da-b0ca-01a77c671104).html)

⁷ <http://www.kcl.ac.uk/ioppn/news/records/2015/August/FewNHSstafffeelabletodealwithvictimsofhumantrafficking%E2%80%93report.aspx>

⁸ Anti-Slavery Day falls on 18 October each year. It was created by Act of Parliament to raise awareness of modern slavery.

Ensuring special funding and attention is devoted to tackling the increase in trafficking of women and girls from Nigeria to Europe

The Commissioner has examined how criminals are opportunistically using the migrant and refugee crisis to increase the trafficking of Nigerian women and girls to Europe. In 2015, 5,633 Nigerian women and girls arrived in Italy by sea, an almost fourfold increase on 2014. The numbers have increased again this year⁹. The International Organization for Migration (IOM), which has counter-trafficking teams on the ground at key ports in Italy, believes that close to 80% of these women and girls are potential victims of trafficking, who criminals plan to exploit in brothels across Europe.

Addressing human trafficking from Nigeria has long been a priority for the Commissioner, as NRM data shows that Nigeria has consistently been a major country of origin of potential victims of modern slavery identified in the UK¹⁰.

94% of victims of human trafficking for the purpose of sexual exploitation who are identified outside of Nigeria are from Edo State.

United Nations Office for Drugs and Crime

Victims who are trafficked to Europe for the purpose of sexual exploitation disproportionately originate from just one area in Nigeria: Edo State, in the south of the country. The United Nations Office on Drugs and Crime (UNODC) stated in 2006 that 94% of victims of human trafficking for the purpose of sexual

exploitation who are identified outside of Nigeria are from Edo State¹¹. Correct as of September 2016, the UNODC's website references reporting by Nigeria's National Agency for the Prohibition of Trafficking in Persons (NAPTIP) which states that 98% of victims rescued from external trafficking for sexual exploitation are from Edo State¹².

The Commissioner has regularly highlighted this Nigerian trafficking crisis in international and UK forums and through the media. The Commissioner spoke about the issue at a modern slavery conference at the United Nations in April 2016 and also briefed the G6 group of interior ministers from Germany, France, Italy, Spain, Poland, the UK and the USA in London in December 2015. The Commissioner visited Edo State in October 2015 with ITN News, wrote a piece in the Guardian and spoke about the issue with the BBC and other key media outlets, including Nigerian community-media.

In 2015, 5,633 Nigerian women and girls arrived in Italy by sea, an almost fourfold increase on 2014.

⁹ IOM email communication

¹⁰ Please see NRM data available through the NCA website at <http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism>

¹² <http://www.unodc.org/nigeria/en/prevention-of-human-trafficking.html>

The Commissioner has worked with partners in Nigeria and the UK to develop recommendations for strategic prevention work centred on Edo State as a key trafficking hub. These stakeholders include community and faith leaders in Edo, academics and NGOs, government officials and law enforcement. In June 2016 the Commissioner provided the Home Secretary with comprehensive proposals for a UK supported strategic prevention project to tackle trafficking at source.

The proposed interventions are built around three pillars:

- I. Building law enforcement and criminal justice capacities in Edo State.
- II. Developing increased awareness and changed attitudes at community level and increased capacity of community-based organisations.
- III. Developing economic opportunities for young people in Edo to help protect them from being enticed by traffickers.

Having undertaken this work, the Commissioner had positive discussions with UK Ministers and officials about how the UK Government's recently announced International Modern Slavery Fund can be most effectively utilised to tackle trafficking from Nigeria. Following a meeting chaired by the Prime Minister during the United Nations General Assembly in September 2016, which was attended by the Commissioner and the President of Nigeria, the Prime Minister announced that at least £5 million will now be spent in Nigeria to tackle human trafficking, particularly in areas such as Edo State. The Commissioner will continue to engage with the UK Government on this issue.

The Prime Minister announced that at least £5 million will now be spent in Nigeria to tackle human trafficking.

Providing recommendations to protect vulnerable children and adults from traffickers amid the refugee and migrant crisis

Earlier this year the former Home Secretary, Rt Hon Theresa May MP, asked the Commissioner to visit the migration “hotspots”¹³ and other relevant locations in Italy and Greece, and to provide advice on what more could be done to ensure unaccompanied children and vulnerable adults are protected from traffickers.

The Commissioner visited Italy and Greece in May and June 2016, and provided advice to the Home Secretary, Foreign Secretary and Secretary of State for International Development in July. The UK Government is considering the advice. Following submission of the Commissioner’s report, in August the Secretary of State for International Development approved a new £4 million joint assistance fund to help protect migrant and refugee women and girls and other vulnerable persons at risk of trafficking, forced labour, gender-based violence, and all other forms of exploitation, in the Mediterranean region.

The migration crisis is being used by human trafficking networks to target and exploit the most vulnerable.

The Commissioner believes that there is strong evidence that the migration crisis is being used by human trafficking networks to target and exploit the most vulnerable and that there is a need for urgent action. The Commissioner believes that key priorities for the UK and other governments include working with partners to prioritise safeguarding against the risks of modern slavery as part of the response to the migration and refugee crisis, and scaling up frontline anti-trafficking safeguarding operations. Priority considerations also include:

- Action to safeguard children, including working with partners to ensure that family reunification processes operate effectively, proactive identification of unaccompanied children, and provision of safe and suitable accommodation and education.
- Strengthening procedures to reduce risks to women and girls, including deployment of humanitarian staff with expertise in preventing sexual and gender-based violence and the creation of dedicated safe spaces.
- Supporting dissemination of information on the rights of migrants and refugees and the risks of trafficking.
- Ensuring that anti-trafficking protections are prioritised and integrated into humanitarian response programmes.
- Supporting deployments of social workers, psychologists and cultural mediators to assist vulnerable groups.
- Ensuring a more effective law enforcement response, including targeted counter-trafficking efforts, an area on which the Commissioner has engaged with Europol.

¹³ The “hotspots” have been set up at selected locations in Italy and Greece with the aim of identifying, registering and fingerprinting arriving migrants and refugees.

Securing a House of Commons committee inquiry into access to benefits for victims of modern slavery

At present many victims who leave safe houses, after receiving a conclusive grounds National Referral Mechanism (NRM) decision, do not receive further support and disappear off the radar. The Commissioner is clear that this is an unacceptable situation. There is no obligation under the UK Government's Adult Victim Support contract, run by The Salvation Army in England and Wales, to collect data or monitor what happens to victims after they have exited safe house support. This is also true for the current arrangements in Scotland and Northern Ireland.

According to information from frontline support organisations, it seems that victims of modern slavery who are non-EU nationals tend to apply for asylum and enter into Home Office asylum accommodation. However, EU and EEA victims are at risk of becoming destitute and homeless due to limited access to support and welfare benefits, including through not being able to claim Housing Benefits following the introduction of the Housing Benefit (Habitual Residence) Amendment Regulations 2014.

The Commissioner wrote to the Rt Hon Frank Field MP in his capacity as Chair of the House of Commons Select Committee for Work and Pensions, to alert him to this situation and suggest a number of recommendations to improve victims' protection and access to support services.

EU and EEA victims of modern slavery are at risk of becoming destitute and homeless due to limited access

One of the core recommendations is to provide concessions to victims of modern slavery, who receive positive NRM conclusive grounds decisions, including access to temporary recourse to public funds. Such a concession would not be a panacea to all of the issues faced by victims of modern slavery when they exit safe accommodation, but could provide for vital needs, such as food to eat and a place to live. Other recommendations include the provision of modern slavery awareness raising and training for Department for Work and Pensions (DWP) frontline staff, and the development of guidance on modern slavery and the impact that it has on its victims.

Consequently, Mr Field wrote a letter to the then Secretary of State for Work and Pensions, Stephen Crabb MP, raising the Commissioner's concerns, which he also discussed with his fellow committee members. This has resulted in a decision by the Work and Pensions Select Committee to carry out an inquiry in autumn 2016 into access to welfare benefits for all victims of modern slavery, as well looking at awareness levels amongst DWP staff on modern slavery issues. The Commissioner will be advising the Committee on the inquiry. A written call for evidence is expected to be sent out in October 2016. The inquiry is to be completed in early 2017, subject to the Committee's diary commitments.

Driving forward improved modern slavery crime recording

National Crime Recording Standards (NCRS) are clear that a crime must be recorded (one per victim) if a victim, or a person reasonably assumed to be acting on behalf of the victim, believes that a crime has occurred¹⁴. Plainly, a referral to the NRM is evidence of such a belief. Yet in financial year 2015/16, 884 modern slavery crimes were recorded by police in England and Wales, compared with 3,146 referrals¹⁵ to the NRM during the same period (see appendix). Although it is not possible to directly link specific NRM referrals to recorded crimes using this data, analysis indicates that at best, 28% of referrals to the NRM in 2015/16 may have resulted in a modern slavery crime being recorded by police in England and Wales¹⁶.

To monitor forces' compliance with NCRS, the Commissioner asked all 43 regional police forces (and the British Transport Police) in England and Wales, Police Scotland and Police Service Northern Ireland (PSNI) for data focused on forces' crime recording capabilities covering financial year 2015/16¹⁷. Analysis revealed some good practice but also several concerning findings.

Police must understand the potential consequences of mismanaging these records and the adverse effect on support services available to victims.

England and Wales

Over half of responding forces¹⁸ (21 of 39) were either unable to answer whether a referral that their force had made into the NRM had resulted in a modern slavery crime record, or expressed significant challenges to doing so¹⁹.

Further, four forces could not find any internal record of the NRM referral(s) made by their force (nor any crime record). For two such forces this was even after seeking assistance from the National Crime Agency's Modern Slavery Human Trafficking Unit (MSHTU). Consequently, in a small number of forces, victims are apparently being lost. These findings reveal not only a failure to comply with NCRS, but also, since July 2016, the Home Office Counting Rule (HOCR) clarification that, "all referrals made by the police into the NRM and all those that the police receive from the NRM must be the subject of a recorded crime of modern slavery"²⁰.

From the evidence collected it is clear to the Commissioner that some forces have no system for storing and managing the NRM referrals made by their force, nor linking them to crime records. One force stated "it is difficult to confirm how many NRMs have been completed as no local record is kept". Another force advised "we have yet to implement a business process

¹⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/534967/count-general-july-2016.pdf

¹⁵ This NRM figure covers financial year 2015/16. The total number of NRM referrals made in calendar year 2015 was 3,266. Please note that the quoted NRM figures refer to all potential victims referred to the NRM, regardless of the decision outcome.

¹⁶ This calculation is based on the total number of potential victims referred to the NRM by police force area of presentation and the total number of modern slavery crimes recorded by police force area in financial year 2015/16. It is however, important to note that it is not possible to directly link NRM referrals to recorded crimes. Confounding issues include that any number of victims relating to recorded crimes may have declined from entering the NRM process; in some cases the exploitation may have happened outside of the UK; or NRM referrals may have resulted in a police recorded crime for another offence, such as child sexual exploitation.

¹⁷ The data request was initially piloted in January 2016 and later revised in August 2016 using feedback from the forces. This process ensured that the data that the Commissioner collected was robust and fit for purpose.

¹⁸ Forces which sent the Commissioner returns for Q1/Q2 and Q3/Q4 (financial year 2015/16) by the deadline set.

¹⁹ Forces were supplied with the financial quarter in which NRM referrals had been made by their police force area as First Responder, along with each referral's Unique Reference Number (generated by the Modern Slavery and Human Trafficking Unit).

²⁰ Rule introduced in July 2016. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/534969/count-violence-july-2016.pdf

for recording all NRM referrals onto [our crime recording system], therefore we are unable to match NRM referrals with offences”. Importantly, NRM referrals can form part of disclosure requirements in a court trial or as ‘first complainant’ records in sexual exploitation cases. Police must understand the potential consequences of mismanaging these records and the adverse effect on support services available to victims.

Some forces could identify reasons why NRM referrals made by their force had not resulted in a modern slavery crime record. Several however, were not only unacceptable to the Commissioner but would now also be classified as contrary to the HOCCR clarification (July 2016). These include that the force was awaiting the outcome of the NRM process at the conclusive grounds decision stage (2 forces); that there was not enough information on the NRM referral form to establish whether a modern slavery crime had taken place - despite the police force being the First Responder who filled out the NRM referral form (1 force); and a lack of awareness/guidance on how to appropriately record modern slavery crimes (5 forces).

Where forces were able to identify that their NRM referrals had a corresponding crime record, 9 forces advised that an offence other than modern slavery had been recorded. The Commissioner uncovered that not all forces are aware of, or following, the HOCCR which sets out that “when considering classification issues in relation to Modern Slavery it is necessary to record both Modern Slavery as well as the most serious additional victim based offence, where the circumstances involve the same victim-offender relationship”²¹. There also appears to be confusion over how to crime cases of modern slavery which incorporate child sexual exploitation (CSE); and there is evidence that CSE teams are referring individuals to the NRM but creating a crime record only for sexual exploitation and not the modern slavery offence. This is not only skewing statistics in this area, but preventing victims from accessing the full range of criminal justice options that should be open to them.

Scotland

In Scotland, a very low number of NRM referrals resulted in a crime record for a human trafficking and exploitation offence in 2015/16 (see appendix). Police Scotland advised that this is due to a policy which states that “crimes committed in Scotland will not be recorded as such until conclusive grounds of the NRM are received”²². The policy is now due to change so that all NRM referrals are linked to a modern slavery crime record.

Northern Ireland

PSNI reported that 100% of NRM referrals in 2015/16 were crimed under a human trafficking and exploitation offence (see appendix).

Northern Ireland’s success demonstrates that it is possible to record modern slavery crime accurately. As the Commissioner’s findings have uncovered, however, chronic weaknesses in modern slavery crime recording in England and Wales remain. Following the Commissioner’s periodic monitoring, forces’ in England and Wales have begun to reassess and attempt to remedy their modern slavery crime recording failings. Strong national leadership is essential to ensure that work continues apace. Inadequacies in this area impact not only present and future victims, but could also allow organised crime groups to act with impunity, compromising the UK’s national security. It is paramount therefore that precise modern slavery crime recording is a policing priority in 2017.

²¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/534967/count-general-july-2016.pdf

²² Information returned to the Commissioner in Police Scotland’s data return for financial year 2015/16.

Galvanising implementation of UN Sustainable Development Goal 8.7

“Take immediate and effective measures to eradicate forced labour and end modern slavery and human trafficking...”



Sustainable Development Goal 8.7

The Sustainable Development Goals, or “Global Goals”, adopted in September 2015, will shape development policy for the United Nations and its 193 member states over the next 15 years. Whilst the initial draft of these Goals included important targets focused on the elimination of the trafficking of women and children and of child labour, there was no clear target on ending all forms of modern slavery and human trafficking. This risked a much reduced level of priority and funding being attached to the issue globally, right up to the year 2030.

Consequently, in spring and summer 2015 the Commissioner led an international effort to secure an anti-slavery target in the UN’s development agenda for 2015-2030, mobilising support from the UK Government, the Vatican and members of the G77 group of countries, among others. During final negotiations “Ending modern slavery and human trafficking” was accepted as an amendment. Sustainable Development Goal 8.7 now calls for effective measures to end forced labour, modern slavery, human trafficking and child labour in all its forms, including the worst forms of child labour. This is a major breakthrough that will bring more focused action, political will and increased funding to the fight against modern slavery globally.

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Goal 8.7 now underpins the UK’s recently announced £33.5m International Modern Slavery Fund, which the Commissioner helped to secure. The Fund will be used to work with key partner countries to prevent modern slavery. The Commissioner has also been advising the UK Government on its emerging international strategy.

The Commissioner, together with the President of the Santa Marta Group, organised a high-level meeting at the United Nations Headquarters in New York in April 2016 to drive forward action to implement Goal 8.7. The meeting, which was attended by the President of the UN General Assembly, international organisations, ministers and ambassadors from Members States from across the world, together with civil society organisations, gave increased prominence to the target.

The Commissioner attended key meetings during the United Nations General Assembly in September 2016 to further galvanise efforts and is working with the International Labour Organization to support its new Alliance 8.7 initiative, which aims to increase international collaboration and assist Member States with practical support to achieve Goal 8.7.

Collaboration with the Independent Chief Inspector of Borders and Immigration to inspect Border Force’s response to the identification of potential victims of modern slavery on entry to the UK

Border Force officers are NRM First Responders and play a key role in the identification of potential victims of modern slavery. Identification can take place while a passenger is being processed by a Border Force officer at the immigration control desk, or from officers’ observation of passengers waiting to be processed. Specially trained Safeguarding and Trafficking officers are available to support frontline staff.

The Independent Chief Inspector of Borders and Immigration has dedicated 350 working days to inspections related to modern slavery.

However, the Commissioner believes that all Border Force staff should be trained in how to recognise signs indicating that a person is a potential victim, and to understand how to refer a potential victim to the NRM for assistance and support. The Commissioner welcomes the

introduction of two new mandatory e-learning courses on modern slavery for Border Force staff: a general modern slavery awareness course, and a specific course on the National Referral Mechanism.

The National Crime Agency’s Strategic Assessment of the Nature and Scale of Human Trafficking in 2014²³ stated that “30 cases of potential trafficking were identified at the border, 17 of those were refused entry and returned to the country from where they have travelled”. The Commissioner was concerned with the low number of identified cases on entry to the UK, but also questioned why potential victims were refused leave to enter the UK and returned to their country of origin, potentially back into the hands of traffickers.

The Commissioner has subsequently initiated collaborative work with the Independent Chief Inspector of Borders and Immigration, David Bolt.

Following discussions with the Commissioner, in his latest annual report the Chief Inspector dedicated 350 working days to inspections related to modern slavery across the border and immigration systems. The Commissioner shared the concerning data published by the NCA Strategic Assessment with the Chief Inspector, and the first joint inspection has since been launched. The inspection will assess the efficiency, effectiveness and consistency of Border Force’s identification and treatment of potential victims of modern slavery at the UK border. The Commissioner provided his advice on the scope, terms of reference and request for evidence for the inspection. The final report will be submitted to the Home Secretary by the end of 2016 and will be published in early 2017.

²³ <http://www.nationalcrimeagency.gov.uk/publications/656-nca-strategic-assessment-the-nature-and-scale-of-human-trafficking-in-2014/file>

Developing improved understanding of modern slavery within the homelessness sector

Anecdotal evidence from the homelessness sector suggests that homeless people and rough sleepers are being targeted by traffickers and approached for work in the informal or black economy, and are being held in exploitation and slave like conditions across the UK. As there is currently no national evidence base or recording mechanisms for this phenomenon, and despite the best efforts of organisations working in this field, the response to date has not been effective.

The Combined Homeless and Information Network (CHAIN) is a database used by rough sleeping services in London, and in autumn 2015 it found that 36% of rough sleepers in London were from Central and Eastern European countries; 31% had drug support needs; 41% had alcohol support needs; and 45% had mental health support needs.²⁴ These needs make homeless people particularly vulnerable and susceptible to modern slavery. Two high-profile cases have demonstrated this. In 2011, 24 men, who had been recruited whilst homeless, were released from a caravan site in Leighton Buzzard where they had been held in modern slavery.²⁵ In the second case, the sentencing remarks of His Honour Judge Michael Kay QC (July 2012), against James John Connors and Josie Connors, referenced the perpetrators' view that "the homeless, addicted and isolated men who sleep rough and beg on the streets were potential workers who could be exploited for financial gain"²⁶.

The Commissioner believes that it is crucial to work closely with the homelessness sector. He commissioned the Passage, a leading homelessness charity that has supported clients who have experienced exploitation and modern slavery, to conduct an exercise to identify the nature and scale of modern slavery issues within the homelessness sector. In addition, the Commissioner asked for information on the knowledge and skills within the homelessness sector on how to respond to modern slavery, as well as existing best practice.

In one instance 24 men enslaved in a caravan site had been recruited whilst homeless.

A final report will be published in November 2016. It will include recommendations for regional and national improvements in homelessness organisations' responses to modern slavery. It will also cover raising awareness amongst local communities, homelessness organisations and homeless people; providing training and guidance to homelessness organisations on how to spot signs of modern slavery and how to refer potential victims for assistance; working in close partnership with local authorities and law enforcement agencies; and collecting and recording data about potential cases of modern slavery in a more consistent and robust way. It is also essential that focus is given to data collection and sharing protocols to address under-reporting of modern slavery crime.

²⁴ Department for Communities and Local Government:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/503015/Rough_Sleeping_Autumn_2015_statistical_release.pdf

²⁵ <https://www.theguardian.com/world/2011/sep/11/leighton-buzzard-slaves-released>

²⁶ <https://www.judiciary.gov.uk/wp-content/uploads/JCO/Documents/Judgments/james-connors-josie-sentencing-remarks-12072012.pdf>

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Priority 1: Victim identification and care

The Commissioner is committed to ensuring that potential victims of modern slavery are removed from their situation of exploitation, and that they receive the care and support they need to rebuild their lives.

Victim identification

The Commissioner, together with NHS England, local authorities and emergency services, has developed awareness videos to educate frontline staff on indicators of modern slavery.

Victims of modern slavery often have complex needs on account of the physical and psychological abuse that they may have suffered. In order to cater to the multiple needs of survivors, all frontline professionals must be aware of the indicators of modern slavery and, as importantly, know what to do next. This means raising awareness and rolling out training programmes across different professions, primarily local authorities, law enforcement agencies and the health sector.

The Commissioner has been working with South East Councils and NHS England to produce a set of three videos targeting NHS frontline staff, emergency services and local councils, as detailed on page 8. The videos aim to raise awareness of modern slavery and highlight the important role that each

practitioner can play in identifying potential victims in their daily activities. The Commissioner will continue engagement with the Royal College of Nursing on developing a wider awareness raising campaign following the introduction of the videos.

Another important agency in the identification of potential victims of modern slavery is UK Border Force. To assess the efficiency, effectiveness and consistency of Border Force's identification and treatment of potential victims of modern slavery at the UK border, a joint inspection has been initiated, together with the Independent Chief Inspector of Borders and Immigration, as detailed on page 16. The final report will be published in early 2017.

The Commissioner influenced changes in immigration policy that amended the terms of the overseas domestic worker visa to reduce domestic workers' risk to exploitation.

Domestic work within private households is globally recognised as a sector in which workers have heightened vulnerability to abuse and exploitation. The protection of overseas domestic workers, on account of the specific nature of their work in private

households, is complex and their working conditions are less visible. Any kind of abuse is often more difficult to detect. The Commissioner provided his views and recommendations to the independent review of the overseas domestic workers'

visa scheme, carried out by James Ewins QC²⁷, during its consultation process. Following the publication of the review, the Commissioner engaged with Home Office Ministers and officials to provide advice and share his recommendations, which were accepted by the UK Government²⁸. These recommendations resulted in important changes in immigration policy, to allow domestic workers on these visas to change employer during their six month stay and to

allow those who have received a positive conclusive grounds NRM decision to stay for two years (beyond their initial 6 month visa) with the right to work in private households. The UK Government also committed to introduce post-arrival information and support for domestic workers, as well as to enhance prevention measures to ensure that information and messages concerning entitlements and obligations are understood before a visa is issued.

Safeguarding of child victims

The Commissioner has been working to ensure that an effective child advocate scheme is in place in England and Wales and will be engaging with Northern Ireland and Scotland as they build on their guardianship services.

Trafficked children, as well as children at risk of being trafficked, are very vulnerable to future harm, abuse and exploitation. This is due to a number of reasons including loyalty to the trafficker, lack of trust in authorities, poor education, limited knowledge of English, and the fact that they are separated from their families. Protection of these vulnerable children is a priority that requires a coordinated and immediate response.

Section 48 of the Modern Slavery Act establishes provision for Independent Child Trafficking Advocates (ICTA) in England and Wales. In January 2014 the Home Office commissioned a trial of independent child trafficking advocates to work with trafficked children across 23 local authorities in England. Following the publication of the

evaluation of the ICTA trial undertaken by the University of Bedfordshire²⁹ and the UK Government's response³⁰, the Commissioner engaged with a number of stakeholders, including child trafficking NGOs, to develop advice on how to improve identification and protection of trafficked children. The Commissioner delivered his recommendations on ICTAs (applicable to England and Wales only) to the then Minister for Preventing Abuse, Exploitation and Crime, Karen Bradley MP.

These recommendations were incorporated in the UK Government's proposals for the interim early adopter sites and the future national roll out of the ICTA model, as well as other proposals to support trafficked children. The recommendations included the development of a culturally tailored approach when assisting child victims of

²⁷https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/486532/ODWV_Review_-_Final_Report__6_11_15_.pdf

²⁸ Overseas Domestic Workers: Written Statement, 7 March 2016 <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Lords/2016-03-07/HLWS568/>

²⁹https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/486138/icta-horr86.pdf

³⁰https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/486957/53019_Un-num_Report_Web_Accessible.pdf

trafficking, the creation of an independent and transparent evaluation mechanism for the introduction of ICTAs in early adopter sites, as well as putting interim measures in place to ensure that children are protected whilst the ICTA model is being refined before roll out across England and Wales.

The Commissioner believes that it is crucial to ensure that an effective system of child advocates is in place to prevent any further exploitation and abuse of trafficked children, but supports the Government's view that the child advocate model needs further work to be fit for purpose. However, the

Commissioner is clear that the UK Government needs to introduce interim measures, as vulnerable children cannot wait two more years whilst long term solutions are developed³¹. Therefore, the Commissioner welcomes the UK Government's decision to establish a new child protection fund of up to £3 million, which will be available for the next three years. The fund aims to tackle the issue of trafficked children going missing and being potentially re-trafficked, and to provide support to children from high-priority countries.

Section 21 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 introduced an independent guardianship scheme for trafficked and separated children. The Northern Ireland Department of Health is currently working to bring forward the necessary regulations to give effect to this provision. The Commissioner will continue to work closely with the relevant authorities to provide his advice and views on this new initiative.

Section 25 of the Children (Scotland) Act 1995 established a "guardianship" system for unaccompanied and separated children. This service provides support to children who are victims of trafficking and exploitation and who do not have anyone with parental rights and responsibilities in the UK, helping them to navigate the immigration and welfare processes, assisting them to access the help they need when they need it, and make informed decisions about their future. The Scottish Guardianship service will be put on a statutory footing after the commencement of **section 11 of the Human Trafficking and Exploitation (Scotland) Act 2015**. The Commissioner will continue to work with the Scottish Government to promote the good practice of the Scottish Guardianship Scheme throughout the whole of the UK.

³¹ <https://hansard.parliament.uk/commons/2016-06-08/debates/16062854000001/IndependentAdvocatesForTraffickedChildren>

Non-prosecution of victims of modern slavery

The Commissioner has been promoting the application of statutory defences and protection measures for victims of modern slavery during legislative processes.

The Commissioner has engaged with the Crown Prosecution Service in England and Wales to ensure that their prosecution policy includes the statutory defence for victims of modern slavery. As there have been numerous cases where potential victims have been trafficked to work in cannabis farms, the Commissioner also engaged with the National Police Chiefs Councils' lead on cannabis crimes to ensure that guidance to police forces includes on Section 45 of the Modern Slavery Act.

Through his engagement with law enforcement agencies, the Commissioner has been promoting the application of the statutory defences for victims of modern slavery and will continue to do so. At present the Commissioner is working with the Independent Police Complaints Commission (IPCC) to establish a process by which the IPCC could investigate if a victim of modern slavery has been wrongfully prosecuted.

Section 45 of the Modern Slavery Act 2015 embeds victims' protection and introduced a defence from being detained, charged and prosecuted for offences committed during exploitation.

Section 22 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 makes equivalent (although not identical) provisions for a statutory defence. The Public Prosecution Service's policy and guidance for prosecutors covers non-prosecution of victims, including the statutory defence.

Section 8 of the Human Trafficking and Exploitation (Scotland) Act 2015 required the Lord Advocate to publish instructions for prosecutors in Scotland on how victims of human trafficking and exploitation who have been reported for a crime should be treated.

Improved care and support for victims

The Commissioner has been promoting best practice in victim care and working to ensure that frontline staff are able to identify and respond to modern slavery.

As detailed on page 12, earlier this year the Commissioner wrote to Frank Field MP in his capacity as Chair of the House of Commons Select Committee for Work and Pensions, raising concerns about the situation victims of modern slavery are facing when leaving the support services, and putting forward a number of recommendations. This has now resulted in an inquiry that will be carried out by the Committee, which will assess access to benefits for all victims of slavery (both EU and non-EU nationals), as well as awareness levels about modern slavery issues amongst Department of Work and Pensions staff.

To drive forward improved sustained care and support for victims and ensure that they continue to receive appropriate support when transitioning to other services, the Commissioner has commissioned the development of practical guidance for local authorities and health services in England and Wales to assess long term needs of victims and identify thresholds of care. This will also analyse potential risks of further harm or exploitation. This guidance aims to lay a foundation on which recommendations will be made to improve the support available to survivors over time so as to assist with their reintegration.

The Commissioner has also worked with the Human Trafficking Foundation to promote

the Trafficking Survivor Care Standards³², a handbook aimed at improving care service provision for victims, and has encouraged the adoption and implementation of these standards across the UK through engagement with statutory and non-statutory organisations. The Commissioner sent a copy of the handbook to all single point of contacts for human trafficking and modern slavery across all police forces in the UK, encouraging them to disseminate the handbook within their police force, and to use its provisions in their work with potential victims of modern slavery.

To ensure cooperation across sectors, the Commissioner has established positive working relationships with both the Victims' Commissioner and the Children's Commissioner for England, signing a Memorandum of Understanding with the Victims' Commissioner and maintaining regular communication with the Children's Commissioner, particularly in relation to protection measures for unaccompanied children living in migrant camps in Calais. The Commissioner has also invited the Children's Commissioner for Wales, the Children and Young People Commissioner in Scotland and the Northern Ireland Commissioner for Children and Young People to engage in Anti-Slavery Day events in London this year.

³² <http://www.humantraffickingfoundation.org/trafficking-survivor-care-standards>



Priority 2: Driving an improved law enforcement and criminal justice approach

The Commissioner is committed to promoting an improved law enforcement and criminal justice response across the UK and strongly welcomed the announcement in July 2016 of a new task force, chaired by the Prime Minister, to further step up the operational response in the UK and across borders. As a member, the Commissioner looks forward to working with the heads of UK law enforcement and intelligence agencies, and other partners, to ensure that modern slavery is addressed with the tools and levels of priority that are devoted to tackling other forms of organised criminality.

Crime recording

The Commissioner asked all 43 regional police forces (and the British Transport Police) in England and Wales, Police Scotland and Police Service Northern Ireland (PSNI) to respond to a data request focused on forces' crime recording capabilities.

As detailed on page 13, to monitor forces' compliance with National Crime Recording Standards, the Commissioner asked all 43 regional police forces (and the British Transport Police) in England & Wales, Police Scotland and Police Service Northern Ireland to respond to a data request focused on

forces' crime recording capabilities covering financial year 2015/16³³. Following the Commissioner's periodic monitoring, forces in England and Wales have begun to reassess, and attempt to remedy, their recording of modern slavery crime.

Training

The Commissioner has been working to develop training programmes for police forces and the judiciary to improve their response to modern slavery crime.

A first class response to modern slavery requires a trained and prepared police force and judiciary. The Modern Slavery Act has given law enforcement and prosecutors new tools to tackle modern slavery; it is now essential that they know how to utilise these tools to their full effect.

Trafficking Task Force to fund and develop training programmes for judges and police officers in England and Wales on the Modern Slavery Act, in particular focusing on how cases may be successfully prosecuted and how coordination with other jurisdictions and victim focused strategies can improve the response to modern slavery crime.

The Commissioner has arranged for the International Bar Association's (IBA) Human

³³ The data request was initially piloted in January 2016 and later revised in August 2016 using feedback from the forces. This process ensured that the data that the Commissioner collected was robust and fit for purpose.

The training for police officers will cover all 43 police forces in England and Wales, with a training manual to be distributed to attendees, so that each separate police force will, thereafter, roll out this training within their own respective units.

To develop training for the judiciary, the Commissioner and the IBA have been working closely with Governor Judges from the Judicial College, which has led to the acceptance, by the College, of IBA and College plans for judicial training. The training will be divided into two sessions: the first at the annual Resident Judges' meeting

in October 2016, and the second as part of the Circuit Sentencing Training Day for Circuit Judges and Recorders in November 2016.

In June 2016 the Commissioner organised for a UK delegation of judges to attend a judge's summit on human trafficking and organised crime at the Vatican, organised by the Pontifical Academy of Sciences. At the summit, the Commissioner addressed judges from across the globe, highlighting the legislative tools that the Modern Slavery Act has now made available to UK prosecutors.

A targeted and focused law enforcement and criminal justice response

The Commissioner is working with partners including Police and Crime Commissioners and Her Majesty's Inspectorate of Constabulary to help drive an improved and proactive law enforcement response and has been encouraging police and prosecutors to use the tools provided by the Modern Slavery Act, such as prevention and risk orders, to their full effect.

The Commissioner has supported the establishment of a modern slavery network for Police and Crime Commissioners (PCCs), in collaboration with the Police and Crime Commissioner for West Yorkshire, who chairs the network. The Commissioner has continuously engaged with PCCs over the last year, particularly following the recent PCC elections, encouraging them to engage in the network and to include modern slavery in their policing plans. Currently 19 PCC plans include modern slavery and the Commissioner expects this number to increase as the recently elected Commissioners finalise their new policing plans.

In July 2016 the Home Secretary commissioned Her Majesty's Inspectorate of

Constabulary (HMIC) to independently assess the police response to modern slavery in England and Wales. This follows the Commissioner's recommendation that any inspections take place after the introduction of the Modern Slavery Act. HMIC will carry out a two phased inspection, beginning in 2016/17 and concluding in 2017/18. The Commissioner is now working with HMIC, as a member of its Expert Reference Group, to ensure that the inspections are targeted appropriately and draw on evidence and analysis developed by his office.

The Commissioner has promoted the use of Slavery and Trafficking Risk and Prevention Orders, which were introduced through the Modern Slavery Act, in the jurisdictions in which they apply. In particular, he has

communicated with modern slavery single points of contact across all police forces to underline how the orders can be used appropriately and effectively. The Commissioner is pleased to note that a number of police forces have taken a proactive approach to use of the new orders to restrict the activity of modern slavery perpetrators and prevent future harm.

The Commissioner has presented at a number of policing events including the National Police College training for senior leaders (PIP level 4), the Annual Conference of International Association of Women's Police, the Police Inspectors Federation and the National Senior Investigators Conference.

The Commissioner has been working to improve strategic cooperation with law enforcement in Romania and the UK.

Through developing increased communication with Romanian officials and UK law enforcement the Commissioner has helped to secure an important agreement, facilitated by his Special Advisor on Strategic Cooperation with Romania on Human Trafficking, for Romanian police officers to be seconded to the UK. Officers will be seconded to Police Scotland and Greater Manchester Police. In recent years, 45 Romanian police officers have been embedded within different British law

In February 2016, at a Crown Prosecution Service event that gathered heads of prosecution from all UK jurisdictions and the Republic of Ireland, the Commissioner helped launch a new commitment for UK prosecuting authorities "to work closely together with law enforcement partners to disrupt networks, prosecute traffickers and safeguard victims' rights within the Criminal Justice Process". The Commissioner endorsed the supporting statement which, among other commitments, calls for Heads of Prosecution to periodically review and update the training for staff who may be involved in the investigation and prosecution of modern slavery, and for better information exchange and collaboration with NGOs.

enforcement agencies and these projects have proved instrumental in facilitating the flow of intelligence and the development of joint investigations between the two jurisdictions. As a result of this sustained law enforcement engagement with the Romanian authorities, the cooperation in area of modern slavery between the two countries is currently at an unprecedented level, including through a record number of Joint Investigation Teams (JITs) with the support of Eurojust and Europol.

Use of cutting edge technology

The Commissioner has secured an agreement for the US Defence Research Advanced Projects Agency (DARPA) to provide its Memex software to UK law enforcement at no cost.

DARPA's Memex software is a package of advanced internet search and analysis capabilities to identify exploitation facilitated online. It scours the internet for otherwise difficult to find information on human trafficking, in particular advertisements used to lure victims into servitude. While much of this information is publicly available, it exists in 90 percent of the so-called "deep web" that popular search engines do not index.

That leaves a multitude of information untouched that may not be valuable to the

average web user but could provide crucial information for investigators. Memex is therefore a package of cutting edge tools that will allow law enforcement uncover a wealth of information that might otherwise be difficult or time-intensive to obtain and to then 'join the dots'.

18 police forces across the UK have now signed up to DARPA's offer of free use of the software and are currently being trained in its use.



Priority 3: Promoting best practice in partnership working

The Commissioner has been working to understand and promote best practice in partnership working across the UK, with an emphasis on partnerships that deliver concrete results, through increased identifications, better outcomes for victims, and a higher rate of successful prosecutions.

Vulnerable communities

The Commissioner has been working in partnership with at-risk communities, diaspora communities, diplomatic missions and expert groups to help better understand and address the vulnerabilities of certain communities to modern slavery.

As detailed on page 17, the Commissioner has commissioned the Passage, a leading homelessness charity with experience of supporting clients who have suffered from modern slavery, to conduct a scoping exercise to help better understand the extent of modern slavery issues in the UK in relation to homelessness. A report, with recommendations, will be published in November 2016. The Commissioner will continue working in partnership with the homelessness sector to ensure the recommendations are put into practice.

The Commissioner has built partnerships with diaspora communities and diplomatic missions in the UK. These are key partners in understanding the traditions and cultures of countries from which victims originate. This knowledge of victims' backgrounds and specific needs is key to facilitating a tailored safeguarding response. The Commissioner has established positive working relations with many foreign embassies including, but not limited to, Romania, Poland, Lithuania, France, Italy, the Philippines, the High

Commission for Nigeria, as well as diaspora organisations such as Shpresa Programme (Albania), Africans Unite Against Child Abuse (AFRUCA) and others.

The Commissioner has also established important partnership relations with the Labour Exploitation Advisory Group (LEAG), a group of key organisations working with potential and actual victims of trafficking for labour exploitation, to advise him on the experiences of vulnerable and exploited workers in the UK, and to ensure that their needs form the basis of action to address trafficking for labour exploitation.

A similar collaborative relationship has been established with the Anti-Trafficking Monitoring Group (ATMG), a group comprised of twelve expert anti-trafficking organisations, which advises the Commissioner on developing trends and discusses concerns around what more needs to be done on the policy level to improve the anti-slavery response. One of the joint initiatives the Commissioner has embarked

upon with the ATMG, together with the Human Trafficking Foundation, is the development of proposals for important improvements to the NRM.

The Commissioner has engaged with a number of faith-based and community organisations. For example, a new initiative by the Church of England that aims to pro-

actively involve dioceses and wider Church networks in developing strategies to detect instances of modern slavery in the community and to assist in the provision of victim support and care. This initiative will be based on a multi-agency partnership model developed by the Diocese of Derby to ensure a community-wide response to modern slavery at the grass roots level.

Working closely with the Devolved Administrations to support strong anti-slavery initiatives in Scotland and Northern Ireland

The Commissioner has been working with the Devolved Administrations as they develop their new strategies and initiatives in line with their respective Acts.

Throughout the year, the Commissioner has provided policy support and advice to the Scottish Government on its anti-trafficking efforts, as a member of the Human Trafficking and Exploitation Strategic Oversight Group, including providing detailed feedback and input that has helped shape Scotland's Human Trafficking and Exploitation Strategy. The Commissioner's work to combat labour exploitation in the fishing industry, as detailed under Priority 4, is particularly relevant as Scotland is among the largest sea fishing nations in Europe, with Scottish vessels landing around two-thirds of the total fish caught in the United Kingdom³⁴. The Commissioner's work to improve strategic cooperation with Romania, including organising the secondment of Romanian police officers to Police Scotland, is also important, as Romania has consistently been one of the top five countries of origin for victims of modern slavery identified in Scotland.

The Commissioner has also provided ongoing policy support to the Northern Ireland Executive, participating in policy debates, conferences and workshops, and providing advice on Northern Ireland's Human Trafficking and Modern Slavery Strategy. The Commissioner's four visits to Northern Ireland have been recognised by the Northern Ireland Department of Justice as key opportunities to raise awareness of modern slavery and to mobilise efforts to combat the crime. In particular, the Commissioner's collaboration with Department of Justice and the Irish Department of Justice and Equality, on a cross-border forum on forced labour, provided a valuable opportunity to engage directly with the private sector, recruitment agencies and other key stakeholders across both Northern Ireland and the Republic of Ireland.

³⁴ <http://www.gov.scot/Topics/marine/Sea-Fisheries>

Awareness raising

The Commissioner has addressed audiences and appeared in the media across the UK and internationally to raise awareness around modern slavery crime to ensure it receives targeted responses that adequately match the gravity of the crime.

In order to promote best practice, it is vital that relevant stakeholders are given clear examples of this. The Commissioner has therefore engaged in hundreds of events across the country over the past year in order to share cases of valuable work that have brought positive results, whether delivered by individuals or in partnership across multiple agencies.

The Commissioner has utilised speaking opportunities, from presentations in schools, to keynote speeches at high level events with world leaders. This includes speaking at the 'Ending Human Trafficking by 2030' conference organised by the Permanent Observer Mission of the Holy See to the UN and the Santa Marta Group at the UN HQ in New York, the annual meeting of G6 European interior ministers, the Santa Marta Group international conference for senior law enforcement and faith leaders in Madrid, the Northern Ireland Cross Border Conference on modern slavery for labour exploitation and the Refugee Welcome Summit, organised by Christian Aid and Citizens UK.

In Northern Ireland the Commissioner has been pleased to support proactive efforts to raise awareness of modern slavery. The Commissioner attended a modern slavery

event in the Parliament Buildings in Belfast, which was the culmination of a project coordinated by 'In The Long Run'. The project involved a series of 10k runs to raise awareness of modern slavery amongst the public.

The Commissioner has been working closely with academics from the Pontifical Academy for Social Sciences. This has included presenting at events attended by mayors and judges from cities across the globe. The Commissioner has provided guidance to the Academy, which leads on a number of anti-slavery initiatives for the Vatican, on supply chain transparency, effective prevention at source and best-practice in responding to vulnerability.

Over the past year the Commissioner has appeared in almost 100 media features, including broadcast, print and online outlets. In recent months, the media has increased its coverage of modern slavery, and the Commissioner has used this opportunity to continue raising awareness. Some of the more prominent pieces in the media in the last year have been with The Times, The Guardian, Thomson Reuters, The Independent, Al Jazeera, Channel 4 and the BBC.



Priority 4: Private sector engagement to encourage supply chain transparency and combat labour exploitation

The UK Government has demonstrated international leadership on the issue of slavery in supply chains through the introduction of the landmark Transparency in Supply Chains section of the Modern Slavery Act. Since October 2015 any commercial organisation in any sector, which supplies goods or services, and carries on a business or part of a business in the UK, and has a turnover of above £36 million, is required to publish an annual statement which describes the steps they have taken to ensure that modern slavery does not take place in their business and supply chains anywhere in the world.

Ensuring supply chains are not tainted by slavery

The Commissioner has been working with the UK Government and its suppliers to encourage leadership by example in its efforts to tackle modern slavery in supply chains.

The Commissioner collaborated with Frank Field MP to hold a Modern Slavery Act roundtable for representatives from the UK Government's major suppliers. As a result, the Cabinet Office has agreed to include a section on the UK Government's expectations regarding modern slavery in their code of conduct for its suppliers. The Commissioner will advise on this in due course. The Commissioner has also now attended and briefed the Commercial

Relationships Board (a meeting held to decide on key procurement issues affecting UK Government) on the need to prioritise addressing modern slavery risks in procurement procedures.

Through these engagements the Commissioner has facilitated opportunities for the UK Government to lead by example in the management of its supply chains.

The Commissioner has communicated with over 1,000 companies operating in the UK, writing to them detailing his expectations of companies in relation to their reporting requirements under Section 54 of the Modern Slavery Act; led roundtables on supply chain transparency; and is working with trade bodies to tackle modern slavery.

The Commissioner is working closely with the Consumer Goods Forum (CGF), a global member driven network, consisting of over 400 retailers, manufacturers and other stakeholders with combined sales of €2.5 trillion, as they have been lobbying to place forced labour on the agenda of the G20. The Commissioner is supporting and has

endorsed their Social Resolution on Forced Labour, launched in 2016, that will drive global collaboration between retailers and manufactures to tackle forced labour.

The Commissioner also supports CGF's Global Social Compliance Programme, an open-source platform that helps promote the harmonisation of efforts for the

improvement of working conditions and will be addressing business leaders at the CGF Sustainable Retail Summit in Paris in October 2016.

The Commissioner has approached companies whose supply chains may have been tainted by slavery to offer assistance and ensure that they are responding to the issue appropriately.

The Commissioner wrote to Kia and Volvo to ascertain what actions they were taking to eradicate slave labour from their supply chains following Al Jazeera's investigation into the use of slave labour in car washes in Kent, and has engaged with tea retailers over reports of exploitation in tea plantations in Assam, India.

The Commissioner has also met with sustainability leaders from the big five supermarkets to discuss their commitments to respond to the risks of modern slavery in supply chains.

The Commissioner has been building awareness across the private sector in a

variety of different ways, including: organising seminars with the UN Global Compact and briefing businesses at events across the UK; working with the All Party Parliamentary Group on Modern Slavery and Human Trafficking to help ensure there is a fit for purpose central repository for modern slavery statements; arranging for the modern slavery helpline to be advertised in EasyJet's internal magazines; working collaboratively with the Chartered Institute of Procurement Services (CIPS); and promoting publications that detail best practice, including writing a foreword for the Chartered Institute of Building's report on modern slavery, and disseminating Finance Against Trafficking's report on Forced Labour, Human Trafficking and the FTSE100.

The Commissioner is also a judge on the board of the Stop Slavery Award, an innovative Thomson Reuters Foundation initiative that recognises companies that are leading the fight against modern slavery in supply chains.

Targeted initiatives with sectors where slavery is likely to be prevalent

The Commissioner has been working with businesses, law enforcement and NGOs to tackle slavery in the fishing industry.

The Commissioner has been working with Seafish, a non-departmental public body set up to raise standards across the seafood industry, encouraging action and advising its members on steps to tackle modern slavery within their supply chains. In particular the Commissioner has been supporting Seafish on the revision of their Responsible Fishing Scheme (RFS), a voluntary programme certifying ethical practices on fishing vessels,

which now includes requirements to ensure that there is no forced labour on accredited vessels. The RFS is the only programme certifying crew welfare as well as responsible catching practices on vessels. Seafish hopes the scheme will be available for future roll out internationally.

Further to this the Commissioner has been working to enhance the ability of law

enforcement to tackle labour exploitation in the fishing industry in UK and Irish waters, through the establishment of the North Atlantic Maritime Project with the Santa Marta Group. The project has led to increased operational activity and brought improved communication and collaboration by linking key partners from law enforcement, the private sector, and civil society including Police Service Northern Ireland, An Garda Síochána, Police Scotland, Seafish, Immigration Enforcement, the International Labour Organization and the Gangmasters Licensing Authority.

The Commissioner has also been supporting the Apostleship of the Sea (AoS), a charity offering pastoral and welfare support to seafarers, to improve the care and support of victims of labour exploitation at sea. The Commissioner developed a leaflet with AoS to publicise available services to those in need in ports across the United Kingdom. AoS employs a team of fully trained port chaplains covering all UK ports, assisted by trained ship visitors, and has emergency accommodation for seafarers in need.

Combating labour exploitation in the UK

The Commissioner has been working to ensure that the Gangmasters Licensing Authority has the powers and remit required to effectively tackle labour exploitation in the UK.

The Commissioner providing a detailed response to the UK Government consultation on 'Tackling Exploitation in the Labour Market', which was widely referenced in the UK Government's final response to the consultation. The Government's response announced that the Gangmasters Licensing Authority (GLA) remit is now being broadened as it transforms into the Gangmasters and Labour Abuse Authority (GLAA), something that the Commissioner has been calling for since his appointment. Further policy changes that the Commissioner pushed for in his response to the consultation that were announced in the Government's response include the creation of a new aggravated breach of labour market legislation and the creation of a new Director of Labour Market Enforcement.

The Commissioner has worked with the GLA and the Romanian authorities to secure an agreement for a Romanian labour inspector to be seconded to the GLA in order to help combat trafficking from Romania to the UK for the purpose of labour exploitation.

The Commissioner has also been working to enhance collaboration with labour inspectorates across Europe through engaging with the International Centre for Migration Policy Development (ICMPD), which has brought together European labour inspectorates to identify common challenges and improve responses through sharing best practices and building points of contact.

The Commissioner has addressed both law enforcement and business audiences on the importance of working together to tackle labour exploitation.

The Commissioner has addressed businesses, recruitment agencies and law enforcement on the importance of collaborative working between the private sector and law enforcement to tackle labour exploitation. In September 2016 the Commissioner made a presentation in West Yorkshire, an area in which 63% of victims referred to the NRM in 2015 were potentially trafficked for labour exploitation, on examples of best practice and practical measures to combat labour exploitation to an audience of 200 business practitioners and police officers.³⁵

In July 2016 the Commissioner collaborated with the Northern Ireland Department of Justice and the Irish Department of Justice and Equality to run a cross-border forum on modern slavery and trafficking for labour exploitation. This event raised awareness amongst employers and recruitment agencies about the responsibilities, risks and requirements under the new Transparency in Supply Chains regulations and their responsibilities as employers to eradicate modern slavery from their businesses and supply chains.

Financial sector engagement

Through the Anti-Money Laundering Professional Forum and the European Bankers Alliance, the Commissioner has addressed banking professionals on the important role of financial institutions in combating modern slavery.

The Commissioner has liaised with the Joint Money Laundering Intelligence Task force about their work in relation to modern slavery and has been invited to brief the task force on human trafficking and money laundering.

The UK Government's action plan for anti-money laundering and counter-terrorist finance, published in April 2016, now recognises that the proceeds of crime from

modern slavery has become one of the most significant money laundering threats. The Commissioner intends to work closely with relevant government bodies and financial institutions, as well as research institutes such as Royal United Services Institute (RUSI) whose workshops on human trafficking and financial institutions the Commissioner has attended, to improve the UK's response to tackling the criminal proceeds of modern slavery.

³⁵ <http://www.nationalcrimeagency.gov.uk/publications/676-national-referral-mechanism-statistics-end-of-year-summary-2015/file>



Priority 5: International collaboration

The Commissioner has developed recommendations for targeted prevention activity and enhanced collaboration. through engagement with partner country governments and agencies, NGOs and academics, British Embassies and High Commissions and government officials. The Commissioner has also worked to ensure that increased levels of priority and funding are devoted to tackling modern slavery globally, including through international development work and humanitarian responses.

In 2015, the top four countries of origin of potential victims of modern slavery referred to the UK's National Referral Mechanism (NRM) were Albania, Vietnam, Nigeria and Romania³⁶. These were also four of the major countries of origin of potential victims highlighted by the National Crime Agency's (NCA) Strategic Assessment on the nature and scale of human trafficking in 2014³⁷. Vietnam, Nigeria and Romania were additionally three of the top five countries of origin of potential victims of modern slavery referred to the NRM specifically in Scotland in 2015³⁸.

Targeted upstream activity

The Commissioner visited Vietnam to strengthen relations with authorities and NGOs and commissioned research to enable the development of effective targeted responses to the exploitation of Vietnamese nationals in the UK.

The Commissioner visited Vietnam in November 2015. The visit helped develop strong commitments from the Vietnamese authorities to work with the UK Government to better understand and end the exploitation of Vietnamese nationals in modern slavery in the UK. As there is currently limited understanding of the situation regarding human trafficking and modern slavery involving Vietnamese nationals, the Commissioner has asked Dr Daniel Silverstone, who is well respected for his work on East Asian organised crime issues, to carry out important research to shine a light on this issue and enable the

development of more effective responses in Vietnam and the UK.

During the first stage of the research Dr Silverstone undertook a state of the art literature review. Following the completion of this review, the Commissioner will provide initial recommendations to the Prime Minister in October 2016. Recommendations will cover the importance of increased focus on monitoring and evaluation of prevention activities, the need to devote greater attention to prevention and reintegration efforts concerning the exploitation of men

³⁶ <http://www.nationalcrimeagency.gov.uk/publications/676-national-referral-mechanism-statistics-end-of-year-summary-2015/file>

³⁷ <http://www.nationalcrimeagency.gov.uk/publications/656-nca-strategic-assessment-the-nature-and-scale-of-human-trafficking-in-2014/file>

³⁸ <http://www.nationalcrimeagency.gov.uk/publications/676-national-referral-mechanism-statistics-end-of-year-summary-2015/file>

and boys (Vietnamese males accounted for 71% of all NRM referrals for this nationality in 2015)³⁹, and ideas on how to equip first responders in the UK to understand the

context of Vietnamese trafficking. Dr Silverstone is now collecting primary evidence in Vietnam and the UK and a final report will be forthcoming.

The Commissioner has submitted recommendations to the UK Government for UK supported prevention activity in Nigeria

As detailed on page 9, in June 2016 the Commissioner submitted recommendations to the UK Government to tackle trafficking for the purpose of sexual exploitation of women and girls from Nigeria to the UK,

through targeted prevention work at source in Edo State, Nigeria's trafficking hub. The Commissioner is pleased that the UK Government has now committed to work to tackle human trafficking in Nigeria.

The Commissioner secured the secondment of a Romanian official to his office, which has resulted in unprecedented levels of bilateral cooperation in the fight against modern slavery.

The Commissioner has worked to strengthen the already positive bi-lateral anti-slavery partnership with Romania, by reaching an agreement for the secondment of a senior Romanian official to his office, to work as a Special Adviser on Strategic Cooperation with Romania on Human Trafficking and to enhance strategic collaboration to tackle modern slavery involving Romanian victims and offenders. This role was established in January 2016, following the Commissioner's visit to Romania in June 2015.

recognised as best practice. The Special Adviser is developing a problem profile on Romanian modern slavery in the UK, as well as recommendations for improved intelligence sharing and operational coordination between UK and Romanian authorities. Early findings indicated that the relevant authorities in both countries continue to often act in isolation to each other. The Special Adviser is, therefore, working to develop a platform to assist practitioners in the UK and Romania to collaboratively progress their cases at the tactical level. He has also advised law enforcement agencies across the UK on best practices and resources available for the prevention and investigation of modern slavery crime in the UK involving Romanian victims or offenders. This has included facilitating secondments of Romanian police officers into UK law enforcement agencies.

The Commissioner's Special Adviser has focused on developing an enhanced common understanding of the extent and nature of human trafficking between Romania and the UK, ensuring effective coordination of prevention strategies and further developing the integrated response to human trafficking within the Romanian Embassy in London, which is already

³⁹ Data supplied to IASC by MSHTU, NCA. Data cut taken on 04/01/2016.

Enhanced European collaboration

The Commissioner has engaged regularly with key actors across Europe to improve cooperation and the use of tools provided by organisations such as Europol and Eurojust.

In December 2015 the Commissioner was invited by the Home Secretary to brief the G6 group of interior ministers from Germany, France, Italy, Spain, Poland, the UK, and also the US Attorney General and Secretary of Homeland Security on the importance of coordinated upstream prevention and use of Joint Investigation Teams (JITs) to tackle modern slavery.

The Commissioner has, on a number of occasions, met with the Director General of Europol, most recently in June 2016 to discuss how the response to human trafficking connected to the migration crisis can be strengthened. The Commissioner has worked with Europol, Eurojust and police forces across the country to encourage effective use of JITs in cases of transnational modern slavery crime. Increasing numbers of forces are now beginning to use JITs or conduct investigations under Mutual Legal Assistance Treaties.

The Commissioner's advice shaped and helped redefine the priorities identified in the UK Government's submission to the

consultation on the European Union's post-2016 Strategy on Trafficking in Human Beings, to include a focus on supporting upstream preventative measures, and the need to integrate anti-human trafficking efforts into humanitarian emergency responses.

The Commissioner met the Council of Europe's Group of Experts on Action against Trafficking in Human Beings (GRETA) during their monitoring visit in October 2015. The Commissioner provided his views and recommendations on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings⁴⁰ by the UK Government.

The Commissioner has also developed important collaborative relationships with the Dutch Rapporteur on Trafficking in Human Beings, the National Anti-Trafficking Coordinators of South Eastern Europe and the Organization for Security and Co-operation in Europe, in order to exchange views on the latest issues and ideas on good practice.

The Commissioner provided recommendations to the Home Secretary on how to urgently address the vulnerabilities of unaccompanied minors and vulnerable adults in camps in Northern France, particularly in Calais.

In August 2015 the Commissioner provided recommendations to the Home Secretary aimed at strengthening the effectiveness of a project for the identification and referral of

potential victims of modern slavery in Calais. Earlier this year the Commissioner met with the French Ambassador to the UK to discuss what more the UK and France could do to

⁴⁰<https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168008371d>

work together to protect vulnerable children and adults. The Commissioner then visited the 'La Lande' camp in Calais, also known as 'the Jungle', meeting with NGOs working on the ground and the migrants living there.

The Commissioner has since written to the Home Secretary to express his concerns about the current situation and provide recommendations to improve efforts to protect vulnerable migrants from modern slavery. Key recommended measures included: the need for more pro-active identification of potential modern slavery cases; provision of adequate accommodation that meets minimum safeguarding and child protection standards; more efficient and sustainable family

reunification procedures under Dublin III and proactive identification and resettlement of unaccompanied minors, where it is in their best interest, as per the announcement by the former Prime Minister reflected in Section 67 of the Immigration Act 2016 (commonly referred to as the Lord Dubs amendment); and improved understanding about the correlation between human trafficking and people smuggling networks, as well as between the nationalities of migrants living in Calais and recent trends of modern slavery in the UK.

The Commissioner will continue to push for immediate implementation of essential safeguards to protect vulnerable adults and children from exploitation.

Modern slavery on the global agenda

The Commissioner led successful efforts to secure an explicit anti-slavery target in the UN's development agenda for 2015-2030, which has ensured that increased prioritisation and funding is dedicated to tackling modern slavery globally.

Sustainable Development Goal 8.7, which calls for effective measures to end forced labour, modern slavery, human trafficking and child labour in all its forms, now underpins the UK Government's new £33.5m International Modern Slavery Fund. The Commissioner provided the UK Government with advice and rationale on the need for anti-slavery funding to be provided from the UK aid budget, which helped secure the new Fund.

The Commissioner, together with the Santa Marta Group, organised a high-level meeting at the United Nations in New York in April 2016, which gave increased prominence to the target and resulted in important

commitments. The Commissioner is also working with the International Labour Organization (ILO) to support its new Alliance 8.7 initiative, which aims to assist Member States with practical support to achieve Goal 8.7.

The Commissioner has continued to help drive forward the unique work of the Santa Marta Group⁴¹ which brings together senior law enforcement chiefs, faith leaders and civil society groups from across the world. This group has provided senior strategic leaders with a platform to exchange best practice and work more closely to deliver operational outcomes. Membership of the Santa Marta Group extends to over 30

⁴¹ <http://santamartagroup.com>

countries from across the globe and in late October 2016 will be reporting its achievements to Pope Francis at the next meeting in the Vatican.

In connection with his work to address the exploitation of Vietnamese nationals, the Commissioner has been working with the

Australian Ambassador for People Smuggling and People Trafficking, to support efforts to refocus and re-energise the Bali Process⁴², an international forum co-chaired by the governments of Australia and Indonesia, towards practical modern slavery initiatives and partnerships.

Embedding protection measures in humanitarian responses

The Commissioner has worked to ensure protection measures against modern slavery are incorporated into emergency humanitarian responses.

In May 2016, to coincide with the World Humanitarian Summit, the Commissioner wrote an article for The Independent highlighting the fact that disaster and crisis situations are resulting in increased levels of human slavery across the world. The Commissioner has been engaging with the UK Government regarding increasing the priority of modern slavery within the

Department for International Development's programming agenda and incorporating modern slavery into their crisis responses. The Commissioner's advice to the UK Government on modern slavery linked to the migrant and refugee crisis makes a number of concrete recommendations as to how protections could be embedded in the response.

⁴² <http://www.baliprocess.net/>

Office of the Independent Anti-Slavery Commissioner budget 2015-16

	Budget £	Expenditure £
Original Budget	500,000	494,836
Pay Budget	380,000	376,970
Non Pay Budget	120,000	117,866

Non Pay Budget

Travel and Other*		54,515
IT & Telecommunications		215
Office Supplies & Publishing		27,954
Research		6,182
Training materials for NHS England and Local Authorities**		29,000

* This includes expenditure for travel within and outside the UK, visas, hotels, subsistence, overseas expenses, taxis and hire cars, all of which were purchased at the standard rate. It includes £575.48 that awaits reimbursement.

** NHS England contributed £11,000 to this project, which has been credited to the Commissioner's budget for 2016/2017. The Commissioner's overall expenditure on this project is £18,000.

Priorities for 2017

Looking forward



Over the next year the Commissioner will continue to implement the commitments listed in his Strategic Plan for 2015-17, which will include the following areas of focus:

Victim identification and care

The Commissioner will focus on recommendations for more radical improvements to the National Referral Mechanism (NRM) model. The NRM is the framework for identifying victims of modern slavery and ensuring they receive the appropriate support. It is also the mechanism through which the NCA's Modern Slavery Human Trafficking Unit (formerly UK Human Trafficking Centre) collects data and information about victims, but unfortunately this is not currently being effectively utilised. The Commissioner will work to ensure that development of intelligence is given greater priority so that more victims are identified and perpetrators reprimanded. The Commissioner is clear, however, that victims' well-being and support must be at the centre of an improved process.

Statutory Guidance on Identifying and Supporting Victims of Modern Slavery in England and Wales is currently being developed by the Home Office and will be put for public consultation⁴³. The Commissioner will work with partners to ensure care standards are included, where relevant, in the Statutory Guidance, and that high quality care is consistently provided across the country. The Commissioner will also continue working with the Scottish Government and the Department of Justice in Northern Ireland to contribute to policy development under their respective legislations.

Protection of trafficked children, and children at risk of being trafficked, will remain a key priority. The Commissioner will continue to engage with the Home Office and relevant NGOs to ensure that the new model of Independent Child Trafficking Advocates is implemented with the best interests of the child at the forefront. The Commissioner will also be engaging with the Department of Health in Northern Ireland as they develop their model for independent guardians for trafficked and separated children⁴⁴.

⁴³ As per Section 49 of the Modern Slavery Act 2015

⁴⁴ According to Section 21 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015

Driving an improved law enforcement and criminal justice response

It is clear to the Commissioner that the collection, recording and analysis of modern slavery data is substandard. From the limited data that is gathered on victims' circumstances via the current NRM system through to compromised crime recording, a lack of intelligence reporting and evidence-based operational action, victims both present and future are being failed.

In 2017 the Commissioner will work with partners to rectify this, around three key areas of focus:

- A redesign of the NRM data collection system to include information that is not only appropriate for victim care, but also the development of evidence led policing in this area.
- The establishment of an analytical hub responsible for the recording of NRM referrals (including their Unique Reference Number), linked crime records and intelligence. This will include the design of a fit for purpose knowledge management system for the collation and extraction of NRM crime and intelligence data. In turn, the hub will facilitate the development of high quality research to support evidence-based modern slavery policing and policy.
- A review of the National Crime Recording Standards and Home Office Counting Rules in relation to modern slavery crime with a view to ensuring that the rules are clear, fit for purpose and delivered to forces with detailed guidance.

Promoting best practice in partnership working

The Commissioner will continue working with a wide range of organisations across the UK, both statutory and non-statutory, to identify and promote best practice among multi-agency partnerships. In recent years there has been a rapid growth of these partnerships across the UK, some have become well-established, well-managed and properly funded, whilst others still struggle to be recognised for their work or achieve successful outcomes. With this in mind, the Commissioner will work to provide guidance and encourage development of outcome-focused models for achieving increased victim identification, increased reporting, more investigations and increased prosecutions and convictions for slavery and human trafficking offences.

Following a successful pilot with NHS England, the Commissioner will seek to replicate awareness raising programmes for health professionals in Wales, Northern Ireland and Scotland.

Private sector engagement and combating labour exploitation

The Commissioner will continue to engage with businesses committed to eradicating slavery from supply chains and to encourage full compliance with the transparency in supply chain section of the Modern Slavery Act. Transparency however, is not an end in itself but rather a means of creating accountability. The Commissioner will work with the All Party Parliamentary Group on Human Trafficking and Modern Slavery to promote utilisation of an effective system that will allow for easy scrutiny and comparison of Slavery and Human Trafficking Statements. This should ensure that business can be better held to account, enabling the public, consumer groups and potential investors to compare corporate responses to addressing modern slavery.

The Commissioner will be working closely with the new Director of Labour Market Enforcement and the reformed Gangmasters and Labour Abuse Authority to prevent and address labour exploitation across the economy. Victims of modern slavery often do not trust the authorities and are fearful of immigration repercussions once they come forward. It is important to ensure that potential victims of exploitation are identified and assisted properly, and do not get criminalised and prosecuted under the offence of illegal working⁴⁵.

International collaboration

The Commissioner will continue to develop strong collaborative relationships with key partner countries. This will include ensuring that the UK maintains strong collaborative law enforcement relationships with partners across Europe.

The Commissioner will engage closely with the Department for International Development as it works to increase the priority attached to modern slavery within its programming and humanitarian responses.

The Commissioner will also develop an evidence based response to human trafficking and modern slavery from Albania to the UK. This will include working jointly with the UK and Albanian governments and the civil society sector to better understand the situation on the ground in Albania, what happens to Albanian nationals once they reach the UK, how to assist those who have fallen prey to traffickers, but most importantly, how to prevent exploitation from happening in the first place and how to develop a stronger bi-lateral law enforcement response to disrupt the criminal networks.

⁴⁵ Section 34-38, Immigration Act 2016

APPENDIX

National Referral Mechanism and modern slavery crime data covering financial year 2015/16, England and Wales⁴⁶

Police Force Area, England and Wales	Number of potential victims referred to NRM where police force area recorded as First Responder organisation (1 referral corresponds to 1 potential victim)	Number of potential victims referred to NRM in police force area where non-police organisations recorded as First Responder organisation (1 referral corresponds to 1 potential victim)	Total number of potential victims referred to NRM in police force area (1 referral corresponds to 1 potential victim)	Number of modern slavery crimes recorded by police force area ⁴⁷	Number of transferred or cancelled modern slavery crimes recorded by police force area ⁴⁸	Number of arrests made for modern slavery crimes recorded by police force area ⁴⁹	Number of modern slavery crimes recorded by police force area in year to March 2016 that had resulted in a charge/summons outcome assigned by police by end March 2016 ⁵⁰
Avon and Somerset	10	18	28	7	2	10	0
Bedfordshire	9	79	88	16	0	3	1
British Transport Police	10	0	10	0	0	0	0
Cambridgeshire	26	13	39	25	0	37	9
Cheshire	4	8	12	17	0	-	17
Cleveland	12	10	22	4	0	4	1
Cumbria	0	0	0	1	1	-	0
Derbyshire	17	5	22	13	0	11	0
Devon and Cornwall	13	6	19	7	0	7	0
Dorset	1	6	7	4	0	0	4
Durham	5	10	15	0	0	0	0
Dyfed-Powys	3	0	3	0	0	0	0
Essex	20	34	54	29	3	14	5
Gloucestershire	2	3	5	6	0	0	0
Greater Manchester	80	63	143	80	4	76	20

⁴⁶ This table includes NRM data supplied to IASC by the MSHTU; arrests data is taken from forces' returns to the Commissioner; the remaining data is drawn from Home Office Official Statistics. Please note that although the NRM and recorded modern slavery crime data sets cover the same time period, they are not linked.

⁴⁷ Police recorded crime (PRC) includes all offences in law that are indictable (those that must or may be dealt with at Crown Court). The Home Office sets out detailed rules and guidance (the Home Office Counting Rules, HOCR) on how and when the 43 regional police forces in England and Wales must record crime for statistical purposes. In April 2015, the Home Office revised the Counting Rules adding a discrete classification for modern slavery. This classification includes trafficking for all forms of exploitation and slavery, servitude and forced or compulsory labour. The HOCR sets out that one modern slavery crime should be recorded for each person subjected to modern slavery. In July 2016 a further HOCR set out that all referrals to the NRM must be the subject of a recorded crime of modern slavery.

⁴⁸ Transferred or cancelled records (formerly 'no-crimes') are those for which police forces originally recorded an offence, but subsequently determined that the crime did not take place, or was recorded in error.

⁴⁹ This information has been compiled from data returned to the Independent Anti-Slavery Commissioner by police forces in England and Wales. (-) indicates no response from a force, or an incomplete response by the set deadline.

⁵⁰ The outcomes framework introduced in April 2014 provides information on how police deal with recorded crimes. A "charge / summons" outcome indicates that a person has been charged or summonsed for the crime (irrespective of any subsequent acquittal at Court). Please note that although the arrests and outcome framework data cover the same time period, they are not linked.

Gwent	2	7	9	0	0	-	0
Hampshire	6	54	60	8	5	5	2
Hertfordshire	4	10	14	4	0	3	1
Humberside	3	4	7	9	0	12	4
Kent	21	66	87	29	3	11	0
Lancashire	6	5	11	6	0	8	4
Leicestershire	2	6	8	1	0	7	0
Lincolnshire	4	6	10	21	1	6	14
London, City of	0	0	0	0	0	0	0
Merseyside	22	116	138	23	3	11	1
Metropolitan Police	85	1157	1242	248	2	71	18
Norfolk	9	5	14	4	2	1	1
North Wales	3	11	14	0	4	11	0
North Yorkshire	4	1	5	2	0	1	0
Northamptonshire	16	18	34	14	4	10	0
Northumbria	21	7	28	16	0	15	4
Nottinghamshire	14	7	21	9	0	14	2
South Wales	11	107	118	0	0	26	0
South Yorkshire	10	65	75	23	1	5	4
Staffordshire	4	31	35	14	2	2	0
Suffolk	7	3	10	7	2	3	0
Surrey	8	9	17	10	2	3	1
Sussex	5	51	56	10	7	10	1
Thames Valley	25	23	48	22	2	26	2
Warwickshire	2	10	12	3	0	11	0
West Mercia	9	6	15	7	0	1	0
West Midlands	83	265	348	89	5	10	0
West Yorkshire	63	165	228	83	2	40	2
Wiltshire	15	0	15	13	0	-	0
GRAND TOTAL	676	2470	3146	884	57	484	118

National Referral Mechanism and modern slavery crime data covering financial year 2015/16, Police Service Northern Ireland⁵¹

Police Force Area, Police Service Northern Ireland	Number of potential victims referred to NRM where police force area recorded as First Responder organisation (1 referral corresponds to 1 potential victim)	Number of potential victims referred to NRM in police force area where non-police organisations recorded as First Responder organisation (1 referral corresponds to 1 potential victim)	Total number of potential victims referred to NRM in police force area (1 referral corresponds to 1 potential victim)	Number of human trafficking and exploitation crimes recorded by police force area	Number of transferred or cancelled human trafficking and exploitation crimes recorded by police force area	Number of arrests made for human trafficking and exploitation crimes recorded by police force area	Number of human trafficking and exploitation crimes recorded by police force area in year to March 2016 that had resulted in a charge/summons outcome assigned by police by end March 2016
PSNI	43	16	59	59	0	12	5

National Referral Mechanism and modern slavery crime data covering financial year 2015/16, Police Scotland⁵²

Police Force Area, Police Scotland	Number of potential victims referred to NRM where police force area recorded as First Responder organisation (1 referral corresponds to 1 potential victim)	Number of potential victims referred to NRM in police force area where non-police organisations recorded as First Responder organisation (1 referral corresponds to 1 potential victim)	Total number of potential victims referred to NRM in police force area (1 referral corresponds to 1 potential victim)	Number of human trafficking and exploitation crimes recorded by police force area	Number of transferred or cancelled human trafficking and exploitation crimes recorded by police force area	Number of arrests made for human trafficking and exploitation crimes recorded by police force area	Number of human trafficking and exploitation crimes recorded by police force area in year to March 2016 that had resulted in a citation to attend court outcome assigned by police by end March 2016
Police Scotland	50	104	154	13	0	4	4

⁵¹ All NRM referral data included in this table has been supplied to IASC by the MSHTU and PSNI. All data other than the NRM referral data included in this table has been supplied to IASC by PSNI.

⁵² All NRM referral data included in this table has been supplied to IASC by the MSHTU. All data other than the NRM referral data included in this table has been supplied to IASC by Police Scotland.

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