



HM Government

# Modern Slavery Strategy



# Modern Slavery Strategy

November 2014

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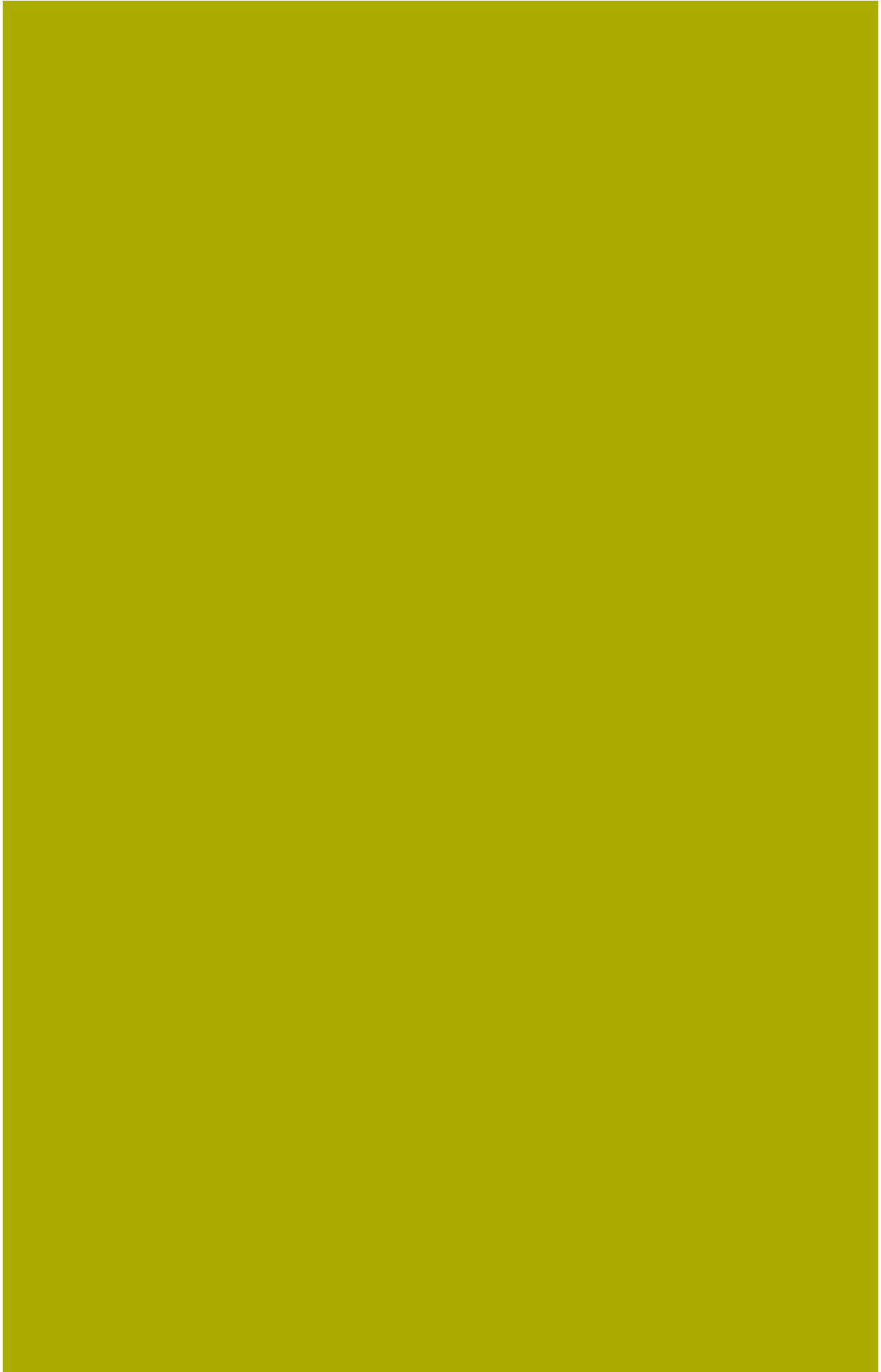
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## Home Secretary Foreword



More than 200 hundred years ago the British House of Commons passed historic legislation to make the slave trade illegal. But sadly, the grim reality today is that slavery still exists in towns, cities and the countryside across the world. And be in no doubt, slavery is taking place here in the UK.

Young girls are raped, beaten, passed from abuser to abuser and sexually exploited for profit. Vulnerable men are tricked into long hours of hard labour before being locked away in cold sheds or rundown caravans. People are made to work in fields, in factories, and on fishing vessels. Women are forced into prostitution, and children systematically exploited. Domestic workers are imprisoned and made to work all hours of the day and night for little or no pay.

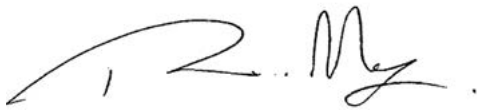
In the UK the scale of this hidden crime is significant. New research carried out by the Home Office estimates that in 2013, the number of potential victims in the UK was between 10,000 –13,000. We know that this number not only represents victims trafficked into the UK, but British adults and children too. The National Crime Agency estimates that in 2013, the UK was the third most common country of origin of identified victims.

We must put a stop to these crimes, and stamp out modern slavery. That is why I have introduced a Modern Slavery Bill – the first of its kind in Europe – to ensure tough penalties are in place, alongside important protections and support for victims.

But I have always been clear that legislation is only part of the answer. The law must be rigorously enforced, and we need comprehensive and wide-ranging action. This Strategy sets out the Government's approach, detailing the work we expect from Government departments, agencies and partners in the UK and internationally.

It puts victims at the heart of everything that we do. And it is built upon the successful frameworks we use to counter terrorism and fight organised crime. It sets out how we will pursue the organised criminals and opportunistic individuals behind the modern day slave trade; prevent people from engaging in modern slavery crimes; protect vulnerable people by raising awareness and stopping them from becoming victims; and prepare for when these crimes have taken place, and help to reduce their impact, through improved protection and support for victims.

The time has come for concerted, coordinated action. Working with a wide-range of partners, we must step up the fight against modern slavery in this country, and internationally, to put an end to the misery suffered by innocent people around the world. Together, we must send a powerful message to all traffickers and slave drivers that they will not get away with their crimes. And we must do all we can to protect, support and help victims, and ensure that they can be returned to freedom.

A handwritten signature in black ink, appearing to read 'Theresa May'.

**The Rt Hon Theresa May MP**

## Minister for Modern Slavery and Organised Crime Foreword



I am proud of our work to tackle modern slavery. The terrible exploitation suffered by victims, adults and children, really cannot be described adequately in words. It scars lives forever.

I was responsible for taking the Modern Slavery Bill through its consideration by the House of Commons and I was really struck by the shared commitment to making sure that we do much more to safeguard and protect victims, as well as pursue those responsible for these crimes.

Every month, I chair a meeting of senior representatives from law enforcement and other agencies that have a role to play in tackling modern slavery and I have heard at first hand the difference that is made when agencies work together and use the full force of their combined capabilities and resources.

Last year we identified more victims and secured more convictions for crimes relating to modern slavery than ever before. I have seen the significant improvements we have made in protections at our major airports and witnessed impressive joint-working between our law enforcement agencies and their partners. But this is only a start. There is so much more we need to do, both here in the UK and overseas.

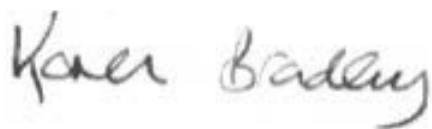
This Strategy sets out all our work to tackle modern slavery. It identifies all those with a role to play and the contributions they will make. Importantly, this is not just about Government departments and their agencies. I want to pay particular tribute to the civil society organisations and charities dedicated to ensuring victims receive the support and help they need. They have an essential role to play and we will only succeed in delivering the aims of this Strategy if we improve the way in which our public authorities work with their NGO partners.

I believe this Strategy sets the right framework to enable this.



Importantly, this Strategy also looks overseas – and not only at those countries from where victims are trafficked to the UK. For the first time, we have also highlighted the need for us to work with those countries where the levels of exploitation, irrespective of whether the victims are trafficked to the UK, demand a response. We want to work with a coalition of partners – drawn from Government and civil society – to make a difference. This will require long-term sustained commitment, but we believe we have a duty to act.

I would like to thank all those who have helped us build this Strategy.

A handwritten signature in black ink that reads "Karen Bradley". The signature is written in a cursive, flowing style.

**Karen Bradley MP**

# Executive Summary

**1.1** This Strategy sets out our comprehensive cross-Government approach to tackling modern slavery. It details the wide-ranging actions that we expect from Government departments, agencies and partners in the UK and, importantly, internationally. Civil society organisations are equally important partners in delivering commitments across our response.

**1.2** Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment. A large number of active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators. This Strategy details the steps we will take to tackle all forms of modern slavery and all perpetrators behind it.

**1.3** The scale of modern slavery in the UK is significant. Modern slavery crimes are being committed across the country and there have been year on year increases in the number of victims identified. This Strategy includes the first official estimate of the scale of modern slavery in the UK. Work by the Home Office Chief Scientific Adviser, Professor Bernard Silverman, has estimated that in 2013 there were between 10,000 – 13,000 potential victims of modern slavery in the UK.

**1.4** Modern slavery is believed to be one of the world's largest international crime industries. The International Labour Organization (ILO) estimates that the total illegal profits obtained from the use of forced labour

worldwide amount to over US \$150 billion per year. Human trafficking for sexual exploitation, just one form of modern slavery, is estimated to cost the UK at least £890 million each year.

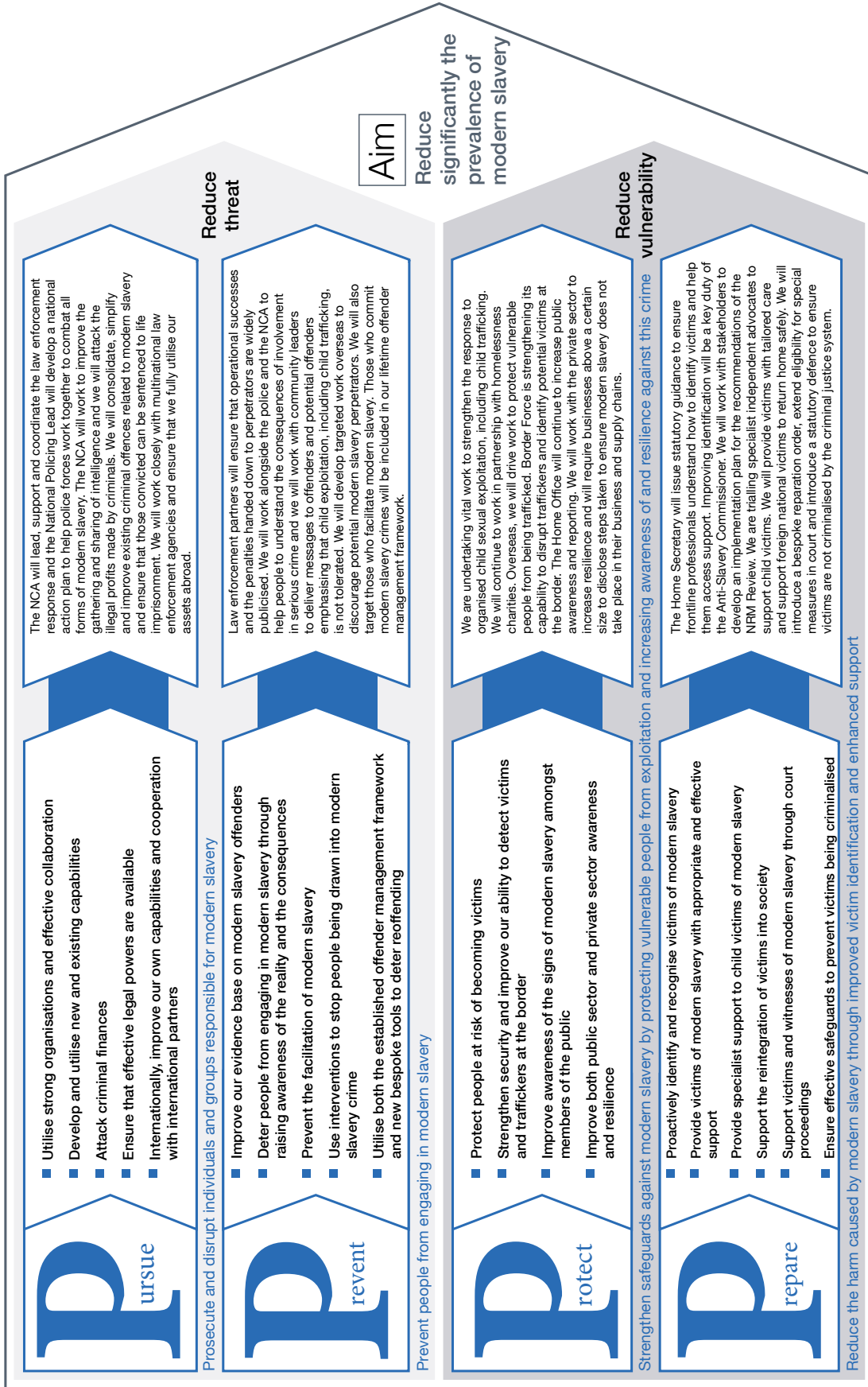
**1.5** In few other crimes are human beings used as commodities over and over again for the profit of others. Victims endure experiences that are horrifying in their inhumanity. Protecting vulnerable people from exploitation and providing enhanced support to victims is central to our entire response.

## Our approach

**1.6** The aim of this Strategy is to reduce significantly the prevalence of modern slavery in the UK, as well as to enhance our international response. Modern slavery is often an international crime and requires a strong collaborative international response.

**1.7** This Strategy builds on and adapts the framework that has been successfully implemented in both our serious and organised crime and counter terrorism strategies. It has four components: prosecuting and disrupting individuals and groups responsible for modern slavery (Pursue); preventing people from engaging in modern slavery crime (Prevent); strengthening safeguards against modern slavery by protecting vulnerable people from exploitation and increasing awareness and resilience against this crime (Protect); and reducing the harm caused by modern slavery through improved victim identification and enhanced support and protection (Prepare).

# Modern Slavery Strategy



## PURSUE

**1.8** Locally through to internationally, strong and coordinated law enforcement structures will be utilised to achieve a step change in our response to modern slavery crime.

**1.9** The Home Secretary has made tackling modern slavery a priority for the National Crime Agency (NCA), which will lead, support and coordinate the law enforcement response. The Gangmasters Licensing Authority (GLA) investigates labour exploitation in the UK and in April 2014 became part of the Home Office, strengthening its enforcement and intelligence capabilities.

**1.10** Police forces have a key role in identifying and combating modern slavery. The National Policing Lead for Modern Slavery will develop a national action plan to help police forces work together to achieve this, which will help ensure that effective local partnerships are developed, including effective sharing of information with NGOs. The new Independent Anti-Slavery Commissioner will support and challenge police forces to improve their response. Regional Organised Crime Units (ROCU) will continue to support and coordinate operations to tackle modern slavery.

**1.11** The Border Policing Command of the NCA now leads, supports and coordinates partners at the UK border in a multi-agency response to tackle international modern slavery crime before it reaches the UK.

**1.12** We will work with law enforcement partners to help them refine and build upon a wide range of existing capabilities and to deploy them to tackle modern slavery. The NCA will build specialist investigative capabilities and knowledge in modern slavery investigations and develop its intelligence gathering and sharing capabilities.

**1.13** Modern slavery generates substantial illegal profits for traffickers and slave drivers. We will strengthen the relevant legal frameworks as well as improving operational practice to enable us to attack these profits and redistribute the assets to both victims and frontline agencies.

**1.14** We will use the Modern Slavery Bill to consolidate, simplify and improve the existing criminal offences relating to modern slavery into a single Act that is easier for law enforcement and prosecutors to understand and use effectively. We will also ensure that those convicted of modern slavery offences can be sentenced to life imprisonment.

**1.15** Internationally, we will drive increased law enforcement cooperation, encourage intelligence sharing, continue to support the establishment of Joint Investigative Teams and ensure we make maximum use of our assets based in priority countries, including the NCA's International Liaison Officer network.

## PREVENT

**1.16** We will continue to develop our understanding of those that engage in modern slavery crime. This is crucial to enabling us to most effectively target Prevent messaging aimed at stopping people becoming involved in modern slavery crime in the first place, as well as deterring offenders from continuing.

**1.17** We will widely publicise the details of our comprehensive programme of activity to tackle modern slavery, sending a clear message that the UK will not tolerate any form of exploitation. Law enforcement partners will also widely publicise details of operational successes and penalties, including details of sentences and assets confiscated.

**1.18** In the UK we will continue to work with local groups to help people understand the consequences of involvement in serious and organised crime. We will also develop targeted activity in priority countries, working with local partners to discourage potential perpetrators.

**1.19** We are committed to preventing child abuse and organised child sexual exploitation, including child trafficking. We have begun to develop a dedicated programme of direct engagement with ‘at risk’ communities, working closely with community leaders.

**1.20** We will step up efforts to tackle criminals that facilitate modern slavery crime and will work with regulators and the private sector to prevent facilitation within the legitimate economy.

**1.21** New Slavery and Trafficking Prevention Orders and Slavery and Trafficking Risk Orders will give law enforcement and the courts the powers they need to prevent the harm caused by modern slavery offences.

**1.22** Those who commit modern slavery crimes will be included in our lifetime offender management programme for tracking serious criminals into and beyond prison.

## PROTECT

**1.23** We are undertaking a wide range of actions to strengthen the local authority response to child abuse and organised child sexual exploitation. The National Group on Sexual Violence against Children and Vulnerable People is now leading agencies to work together to better identify those at risk and create a more victim-focused culture within the police, health and children’s services.

**1.24** Homeless people are especially vulnerable to being targeted by traffickers and slave drivers. We will work with homelessness

charities to raise awareness and ensure staff can spot the signs of modern slavery.

**1.25** We will work with international and local partners to protect vulnerable people from being exploited in countries from which victims are trafficked to the UK, as well as in additional countries that suffer from a high incidence of modern slavery.

**1.26** Border Force has established a dedicated programme of activity to strengthen its capabilities to detect potential victims and traffickers at the border, which includes deploying specialist safeguarding and trafficking teams at major ports and airports.

**1.27** The Home Office is working to increase public awareness of modern slavery and how to report it through the delivery of a national communications strategy. A small-business awareness campaign will target sectors of the economy in which incidences of modern slavery have been reported.

**1.28** We are committed to working in partnership with the private sector to increase resilience against modern slavery. The GLA and HM Revenue and Customs (HMRC) will work with trade associations and industry bodies to provide guidance and support. We will introduce a legal duty requiring all businesses above a certain size to disclose annually what action they are taking to ensure that their business and supply chains are not tainted by modern slavery.

## PREPARE

**1.29** The new Independent Anti-Slavery Commissioner will work with police forces and other partners to help improve their ability to recognise and support victims, including developing good practice in working collaboratively with NGOs. The Home Secretary will issue statutory guidance to ensure that frontline professionals understand how to identify victims and help them access support, which will be developed in close collaboration with a wide range of organisations who have expertise in this area.

**1.30** The Review of the National Referral Mechanism was published in November 2014 and recommended fundamental reform. All recommendations have been accepted in principle by the Government. The Home Office will establish two pilots to test the recommendations and will work with stakeholders to develop an implementation plan.

**1.31** We are committed to providing victims with the help and support they need through the national support service, which we will ensure covers all victims of modern slavery.

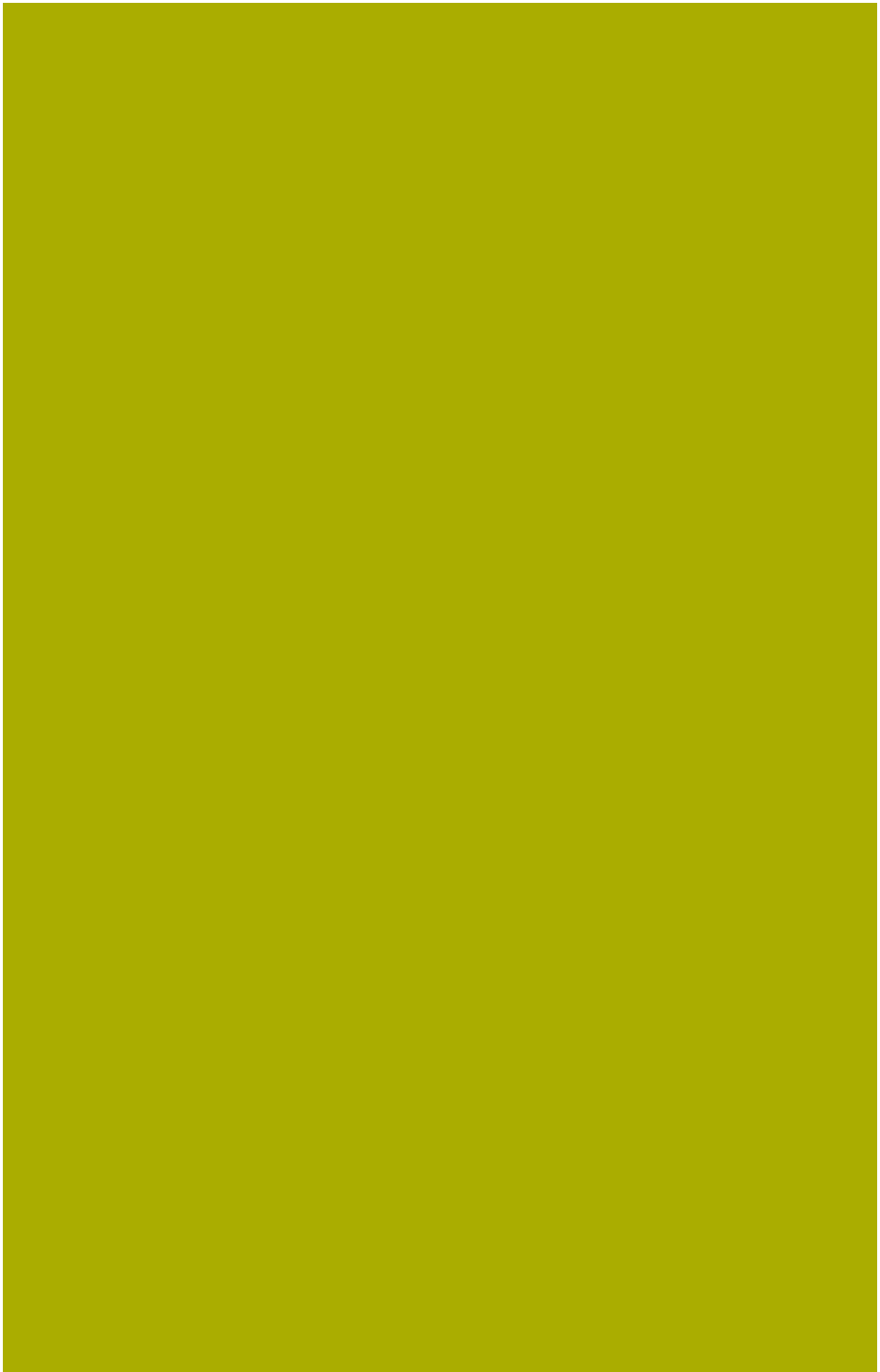
**1.32** We will provide specialist support to child victims that recognises their unique vulnerabilities, which includes trialling specialist child advocates to help ensure child victims receive the support and protection they need.

**1.33** We will support the reintegration of victims into society, which will include improving support for foreign national victims returning home overseas and building NGO capacity to support reintegration.

**1.34** Compensation can be very important in a survivor's recovery. We will introduce a bespoke reparation order to ensure more money recovered from convicted traffickers and slave drivers goes to victims.

**1.35** We will extend automatic eligibility for special measures to all victims of modern slavery to better support these vulnerable individuals through court proceedings.

**1.36** Through the Modern Slavery Bill we will introduce a statutory defence for victims who have been compelled to commit an offence as a direct consequence of their trafficking or slavery situation, which will include clear safeguards to ensure there is no possible legal loophole for serious criminals to escape justice.



# Modern Slavery in the UK

**2.1** Modern slavery is a complex crime that takes a number of different forms. It encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment. Victims may be sexually exploited, forced to work for little or no pay or forced to commit criminal activities against their will. Victims are often pressured into debt-bondage and are likely to be fearful of those who exploit them, who will often threaten and abuse victims and their families. All of these factors make it very difficult for victims to escape.

**2.2** Modern slavery crimes are being committed across the UK and there have been year on year increases in the number of victims of modern slavery identified in this country. These crimes are taking place in factories, fields, brothels and even in homes up and down the country. There is no typical victim of slavery – victims can be men, women or children of all ages and nationalities. Many victims are foreign nationals who are brought to the UK specifically so they can be abused and exploited for the benefit of others. Some are tricked into believing they are simply paying others to facilitate their journey to the UK, or that they are being smuggled here. Many often do not find out that they are destined for a life of abuse and servitude until after they arrive.

**2.3** However, we also know that a high number of victims are UK nationals, including children. Not all victims of modern slavery are trafficked across the border. We know that the internal trafficking of victims to other parts of the country takes place, and other forms of modern slavery take place that involve no movement of the victim at all.

## The scale of modern slavery

**2.4** Modern slavery is a global crime, with victims and offenders often moving between source, transit and destination countries. There are a number of estimates of the total number of victims of modern slavery across the world. The hidden nature of modern slavery and different definitions and methods used mean there are limitations to these estimates. The Global Slavery Index estimates there are 35.8 million victims of slavery across the world<sup>1</sup>, while in 2012 the International Labour Organisation estimated that there were 21 million victims of forced labour alone<sup>2</sup>. Modern slavery has huge social and economic impacts. Human trafficking for sexual exploitation, just one form of modern slavery, is estimated to cost the UK at least £890 million each year<sup>3</sup>.

<sup>1</sup> Walk Free Foundation (2014) Global Slavery Index. Available at [www.globalslaveryindex.org](http://www.globalslaveryindex.org)

<sup>2</sup> Summary of ILO report June 2012: [http://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---declaration/documents/publication/wcms\\_181953.pdf](http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_181953.pdf)

<sup>3</sup> Home Office Science Research Report 73 (2013) *Understanding organised crime: estimating the scale and social and economic costs* <https://www.gov.uk/government/publications/understanding-organised-crime-estimating-the-scale-and-the-social-and-economic-costs>





\*The annual Strategic Assessments began in 2011, meaning that no estimates are available for 2009 or 2010. NRM figures for 2009 are for the period April-December only.

**2.5** There are many challenges associated with measuring the scale of modern slavery in the UK. Victims of modern slavery tend to be controlled and hidden away or may not come forward due to feelings of fear and shame. Some victims may not be identified by those who encounter them. Others may not view themselves as victims of exploitation. This is particularly true of children, who will often not have a clear understanding of what is happening to them or will be submitting to what they believe is the will of their parents or accompanying adults.

**2.6** Our two most reliable sources of data about modern slavery are:

- The National Referral Mechanism (NRM), a support process to which a range of organisations refer potential victims; and

- Annual Strategic Assessments published by the National Crime Agency (NCA), which supplement NRM data with additional intelligence from relevant agencies and NGOs<sup>4</sup>.

**2.7** Both data sources show a consistent and sustained increase in the detection of modern slavery in the UK since data was first collected. The most recent Strategic Assessment reported that 2,744 potential victims were encountered in 2013. This is an increase of 22 percent compared with 2012. The NRM statistics for the same period show an even sharper increase. In 2013, 1,746

<sup>4</sup> The phrase 'potential victims' is used in relation to currently available data sources (National Referral Mechanism statistics and the NCA Strategic Assessment) as it designates that an individual has been identified and referred as a potential victim of human trafficking but not the outcome of a decision which may or may not confirm their victim status.

potential victims were referred to the NRM – a 47 per cent increase on 2012<sup>5</sup>.

**2.8** We believe that this increase is likely to be at least in part due to the increased priority now attached to tackling this crime and the increased focus of law enforcement and other partners, rather than solely reflecting an increase in the scale of modern slavery itself.

**2.9** It is important to note that not all referrals into the NRM result in individuals being positively identified as victims. Between 2009 and 2013, on average 42% of individuals referred to the NRM received a positive conclusive grounds decision that they were a victim<sup>6</sup>. Potential victims receive a positive conclusive grounds decision if the available evidence suggests on the balance of probabilities that they are an actual victim.

**2.10** Data from both the NRM and the NCA Strategic Assessments indicates that more women are identified as potential victims of modern slavery than men. In 2013, almost two-thirds of referrals into the NRM were women, a proportion which has remained stable since 2011.

**2.11** We believe that these figures underestimate the true scale of modern slavery in the UK. It is widely accepted that this is a hidden crime. Many victims will still be in slavery or servitude, with their exploiters preventing them from being identified. Victims in certain circumstance may not even view themselves as victims of exploitation. Some victims may not be identified by those who encounter them and we know that many victims who escape choose not to come forward to the authorities. Many potential

victims do not agree to being referred into the NRM and are therefore not included in the NRM figures. For example, the majority of potential victims identified at the border by UK Border Force do not consent to referral to the NRM. Although the NCA Strategic Assessment supplements NRM data with additional intelligence from relevant agencies and NGOs, we know that it still only presents a partial picture of the size and scale of modern slavery in this country, particularly as not all agencies and NGOs contribute information.

**2.12** The Home Office has been working to establish whether it is possible to estimate the number of cases of modern slavery that have not come to our attention in order to enable us to provide an estimate of the potential scale of modern slavery in the UK.

**2.13** Based upon analysis using established statistical methods, the Home Office Chief Scientific Adviser, Professor Bernard Silverman, has estimated that in 2013 there were between 10,000 – 13,000 potential victims of modern slavery in the UK<sup>7</sup>. Whilst this figure can only be an estimate and should be considered as such, it is consistent with our view that the scale of modern slavery in the UK is significant and demands a comprehensive strategic response.

<sup>5</sup> NRM data in this report is based on data taken from the NRM database on 01/07/2014, meaning some figures may differ slightly from previously published NRM statistics.

<sup>6</sup> Decisions about victim status presented in this report are a snapshot in time and decision data is correct as at 30/06/2014.

<sup>7</sup> Silverman, B. Home Office (2014) *Modern Slavery: an application of Multiple Systems Estimation* <https://www.gov.uk/government/publications/modern-slavery-an-application-of-multiple-systems-estimation>

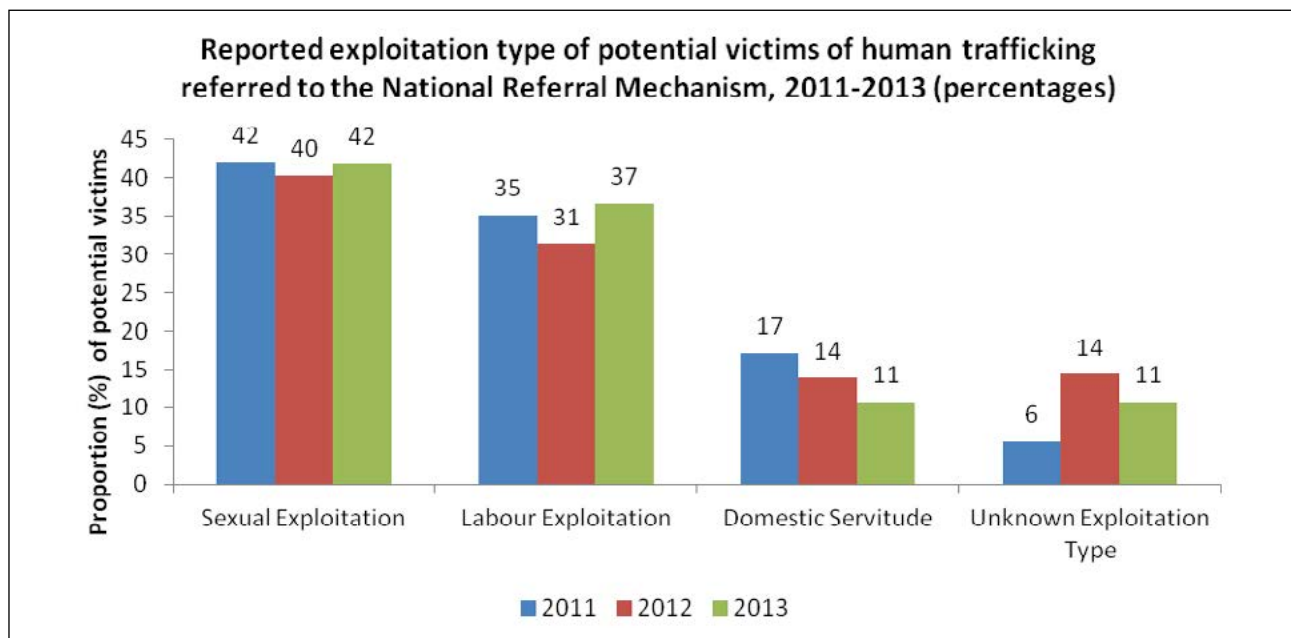
## Forms of modern slavery in the UK

**2.14** Although both the NRM and the Strategic Assessment data does not fully capture the scale of modern slavery in the UK, it has helped us to understand the different forms of exploitation to which victims are subjected. The NRM data and the NCA Strategic Assessments categorise the

reported types of exploitation experienced by potential victims and both sources show broadly comparable patterns of the extent of each type since 2011.

### Sexual exploitation

**2.15** Sexual exploitation is the most common form of modern slavery reported by potential victims in the UK. Forty-two per cent of potential victims of modern slavery referred



### Case Study: Sarita from Nigeria

Sarita (not her real name) grew up in Nigeria with her parents and siblings. The family scraped a living by selling bean cakes by the side of the road. Over the course of five years, Sarita and her mother were befriended by a man who would regularly buy their goods. Trusting the man, the family agreed to Sarita travelling with him to Europe to find work as a waitress or a nanny. Sarita was presented with a passport and travel documents with a different name and date of birth. The man explained this was simply to overcome the fact she was too young to work abroad. He reassured Sarita's mother, who was anxious about paying back the money for her travel, that Sarita's wages would soon cover this. Before leaving Nigeria, Sarita was taken to a ritualistic "juju" ceremony in Nigeria to make her afraid of disobeying the man.

Along with four other young women, Sarita travelled with her trafficker to Germany, where they were taken to a large house. The trafficker became instantly aggressive and told the women that they would have to work as prostitutes to pay back their travel costs. Sarita was devastated. She was threatened with violence and humiliation to her family should she ever try to escape and she was assaulted if she did not willingly comply with the prostitution. Brought to the UK, her exploitation continued. On one occasion she was tricked into taking a drugged drink and regained consciousness to find two men raping her.

One day, seeing an opportunity to escape, the women panicked and ran into the street and became separated. Frightened and vulnerable, Sarita was helped to a police station where staff and solicitors referred her to The Salvation Army. At a safehouse she received much needed counselling and legal support (and was granted refugee status). Staff helped her find somewhere to live and gave her opportunities for training. By the time Sarita left the safehouse staff had witnessed a remarkable transformation in her manner and attitude to life. Sarita is now living independently and is studying, and recently went on an apprenticeship scheme for a major UK supermarket group.

to the NRM in 2013 reported experiencing sexual exploitation. Victims are often forced into prostitution, escort work or pornography. Almost all (95%) NRM referrals for sexual exploitation in 2013 were female and 20% of all referrals were children. Albania, Romania, Nigeria and the UK are the most common countries of origin of potential victims of sexual exploitation.

**2.16** Many foreign national victims report being brought to the UK expecting legitimate work, often recruited by boyfriends, spouses or close associates, only to find out they will be sexually exploited after they arrive. Victims are coerced, often under the threat

of violence to them or their family, and can end up debt bonded and under the control of those who exploit them. Criminals also use the UK as a transit point to traffic victims, particularly women from Nigeria, to other countries across Europe.

### Labour exploitation (including criminal exploitation)<sup>8</sup>

**2.17** Labour exploitation is the second most common form of modern slavery exploitation in the UK – 37% of potential victims referred

<sup>8</sup> NRM data includes criminal exploitation within the category of labour exploitation, while the NCA Strategic Assessment data treats criminal exploitation and labour exploitation as separate categories.

### Case Study: Brian from Kidderminster

Brian (not his real name), a 30 year old British man from Kidderminster, had been reported missing in 2000 having failed to return home from a seaside trip to Porthcawl in South Wales. The man had been picked up on a dual carriageway and offered work at a horse farm in Newport. The 'work' turned out to be forced labour and his accommodation was a rat-infested shed with no washing facilities. He was usually forced to work 14 hours a day, 7 days a week, and during the 13 years he was forced to work at the farm he received no pay.

His family eventually tracked him down with the help of Gwent Police and he was rescued in 2013. When the man was found his family struggled to recognise him, as during the 13 years he had been held at the farm his health had deteriorated badly. He suffered a fractured hip falling from a horse, a chest infection, a hernia and calloused feet.

Gwent Police arrested a number of people following a complex and lengthy investigation. In October 2014 a 42 year old man was sentenced at Cardiff Crown Court to four and a half years imprisonment for forced labour exploitation related offences. This case drew on a multi-agency response led by Gwent Police and involved a number of other police forces across the UK, the UK Human Trafficking Centre, local authorities, health services, the Red Cross and BAWSO (a Welsh Government accredited support provider). As part of Gwent Police's investigation, a number of other victims have been identified and prosecutions have been brought against the accused.

to the NRM in 2013 had experienced this form of modern slavery. Between October 2013 and March 2014 the number of NRM referrals for labour exploitation was slightly higher than for sexual exploitation. However, the most recent available data (covering April to June 2014)<sup>9</sup> shows the number of referrals for labour exploitation was lower than for sexual exploitation.

**2.18** Victims are forced to work against their will, often working very long hours for little or no pay in dire conditions and under verbal or physical threats of violence to them or their families. About three-quarters of potential victims of this form of modern slavery referred to the NRM in 2013 were male, and nearly one-fifth were children. The most common countries of origin for individuals believed to

have been trafficked for labour and criminal exploitation included Poland, Lithuania, Latvia and Hungary.

**2.19** Traffickers and slave drivers are known to target vulnerable men, such as those with drug and alcohol dependency, or with learning or mental health difficulties. They frequent homeless shelters, soup kitchens and rough sleeping areas to recruit 'workers'. Labour exploitation takes place in many sectors of our economy, from mining to tarmacking, hospitality and food packaging. The most common forms of labour exploitation reported by victims identified by the NCA Strategic Assessment in 2013 were in the block paving, agriculture, food and construction sectors.

**2.20** Some victims are kept in 'debt bondage' (also known as bonded labour), an arrangement where a person is forced to pay off a loan with direct labour in place of

<sup>9</sup> National Crime Agency (2014) Human Trafficking: National Referral Mechanism Statistics April to June 2014. Available at: <http://www.nationalcrimeagency.gov.uk/publications/national-referral-mechanism-statistics>

currency over an agreed or often obscure period of time. Victims are often tricked or trapped into working for very little or no pay, and the value of their work becomes invariably greater than the original sum of money ‘borrowed’. Victims often have no way to pay off the loan. Debts are also sometimes passed on to their children. In many cases bank cards, national insurance details and ID cards are also taken from victims, and used to claim benefits on their behalf.

**2.21** Victims are also forced to commit crime, such as pick-pocketing, benefit fraud, shop-lifting, cannabis cultivation and drug trafficking. In 2013, around one-third of potential victims of criminal exploitation identified by the Strategic Assessment reported they had been forced to commit benefit or financial fraud, while around one-fifth had been forced to work on cannabis farms.

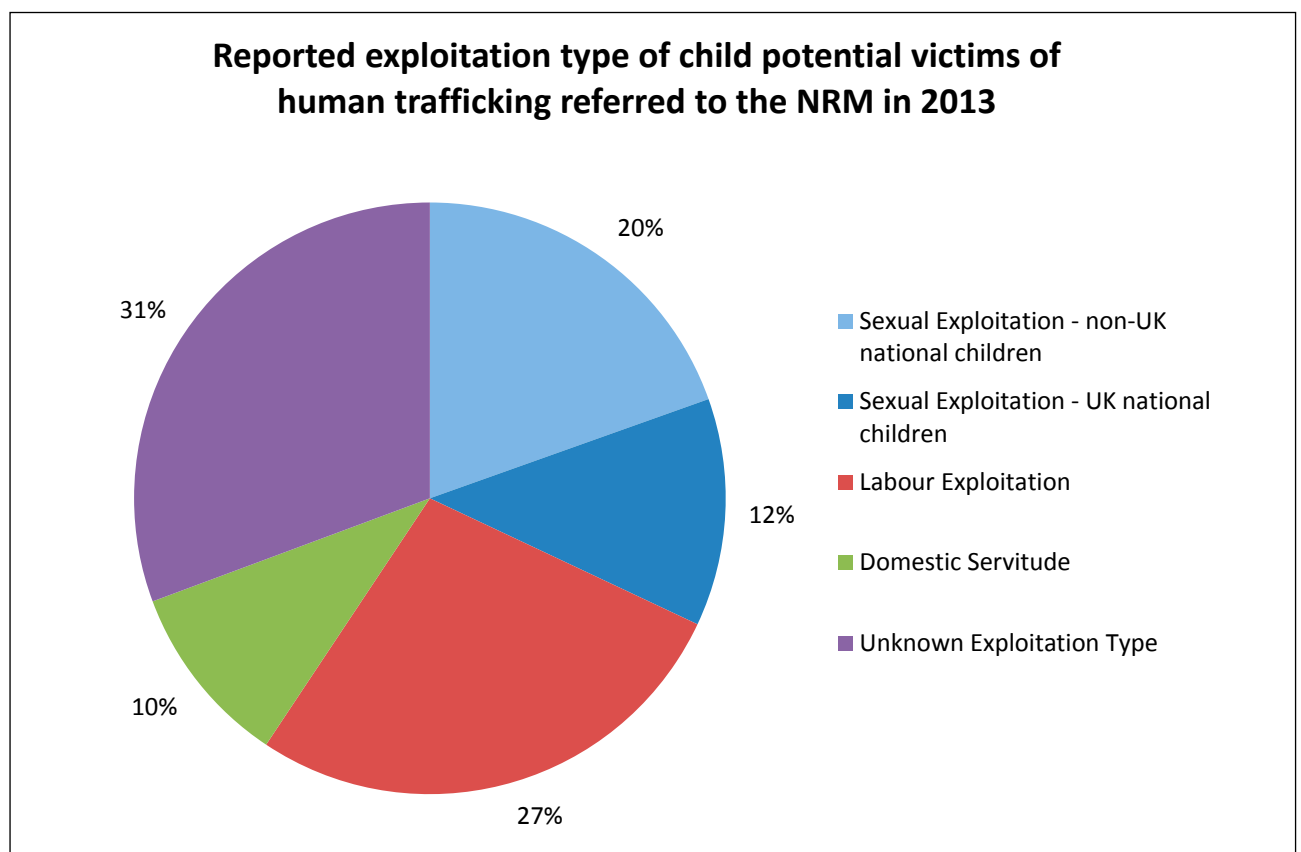
**Domestic servitude**

**2.22** Domestic servitude involves trafficking individuals for the purpose of working as a household servant and it is often perpetrated by individuals or families. Victims are forced to carry out housework and domestic chores in private households with little or no pay and often restricted movement, very limited or no free time and minimal privacy, in addition to often being forced to sleep where they work. As it takes place in private households it is a deeply hidden form of exploitation.

**2.23** The majority of victims of domestic servitude referred to the NRM in 2013 were women, and Nigeria was the most common country of origin of potential victims.

**Child victims of modern slavery**

**2.24** We know that perpetrators deliberately target children, preying on their vulnerability, and as a result children account for a large



### Case Study: Shameem from Pakistan

Shameem (not her real name) was 10 years old when she was trafficked to the UK. Ilyas and Tallat Ashar brought the girl, who is deaf, from Pakistan and kept her at their home in Salford, where she was forced to sleep in the cellar despite there being spare bedrooms at the property. Shameem was repeatedly raped by Ilyas Ashar, 84, and his wife Tallat Ashar, 68, forced her to cook and clean at a number of properties they owned. Thousands of pounds in benefits were also claimed in Shameem's name (which she did not receive) and a number of bank accounts were set up using her details. Shameem's ordeal lasted for nearly a decade.

Shameem was only found after Trading Standards officials visited the Ashars' home to investigate allegations of money laundering. When Shameem was discovered she was in a cot bed in the cellar of the house, a space described as cold and dark with a small amount of furniture. When officers tried to speak to her at the house they realised she was incapable of communication and moved her to a place of safety. Details of Shameem's ordeal only emerged after she was taught sign language. After just three months of teaching, Shameem's skills had improved sufficiently for her to be interviewed by police. Officers spoke to her seven times, during carefully planned sessions involving a sign language interpreter.

After a trial in October 2013, Ilyas Ashar was found guilty of 13 counts of raping Shameem. He and Tallat Ashar were both convicted of trafficking and benefit fraud. They were originally sentenced to 13 years and five years respectively. In February 2014 the Court of Appeal extended their jail terms to 15 years and six years respectively after the sentences were described as "unduly lenient". The couple's daughter, Faaiza Ashar, 47, was given a 12-month community order with 300 hours of unpaid work after she was also found guilty of benefit fraud. In October 2014 Manchester Crown Court ruled that the Ashars must pay Shameem £100,000 in compensation. The Ashars must also repay £42,000 of benefits falsely claimed in her name and pay £321,000 towards the cost of their trials.

proportion of victims. Since 2009 between one-quarter and one-third of potential victims of human trafficking referred to the NRM each year were children<sup>10</sup>. Almost 1,500 potential child victims of human trafficking have been identified since 2009. The most common countries of origin for potential child victims referred to the NRM between 2009 and 2013 were Vietnam, Nigeria, the UK, China and Albania.

**2.25** Almost one-third (32%) of all potential child victims referred to the NRM in 2013

reported having been subjected to sexual exploitation and there has been an increase in the number of child victims from the UK since 2009. Thirty-nine per cent of all child potential victims of sexual exploitation referred to the NRM in 2013 were UK nationals<sup>11</sup>.

**2.26** This increase in referrals may reflect the increased awareness of child sexual exploitation that has come to light in the wake of the Operation Yewtree investigations and more recent cases of organised child sexual exploitation in Rotherham, Oxford and Rochdale.

<sup>10</sup> Children are defined as individuals aged under 18 at the time of exploitation.

<sup>11</sup> The exploitation type was unknown in a high proportion of cases (31%).

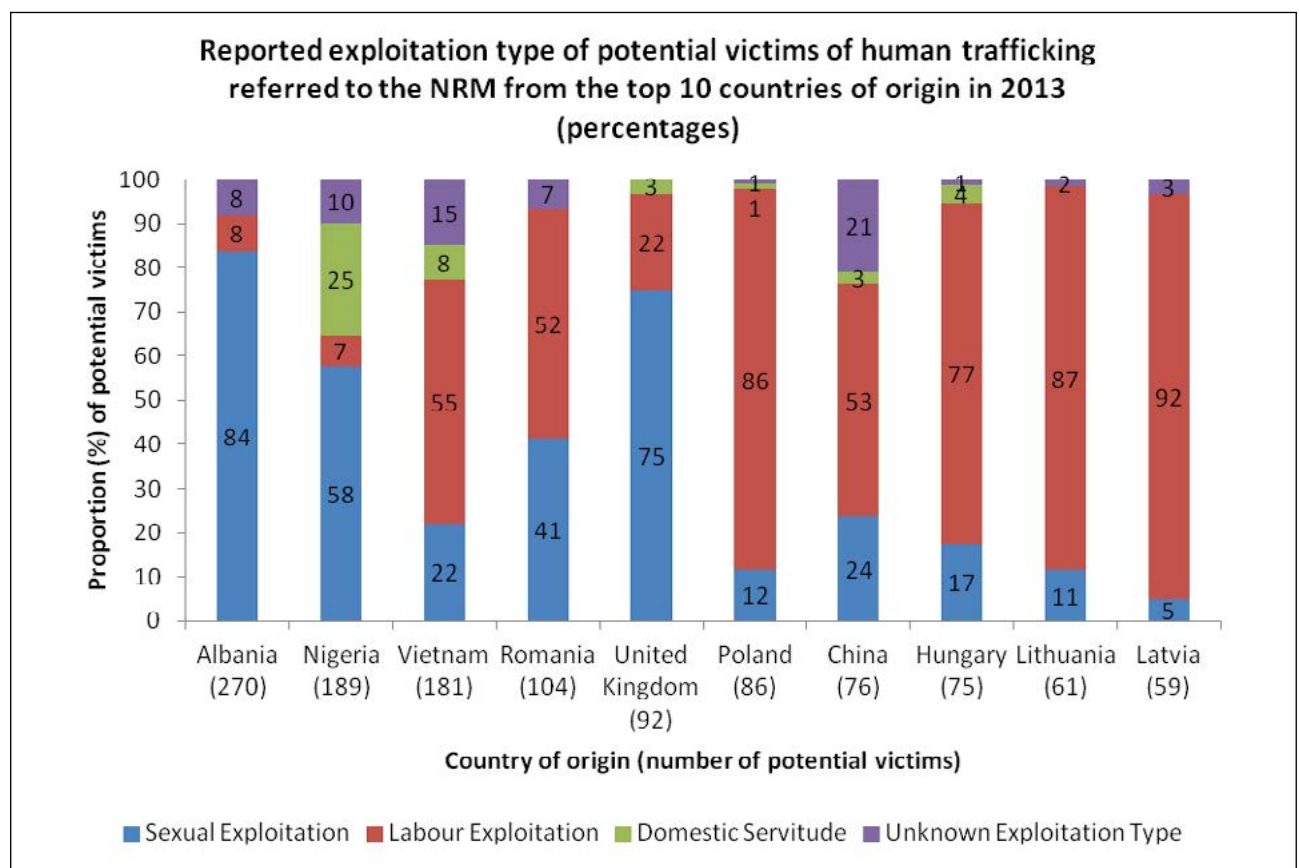
**2.27** Girls are more likely to be victims of sexual exploitation, while boys are more likely to be victims of labour exploitation or criminal exploitation, where they are compelled by their abusers to commit crimes. For example, there is clear intelligence from the NCA of Vietnamese boys being forced to work in cannabis factories and farms by their abusers.

**Country of origin of potential victims**

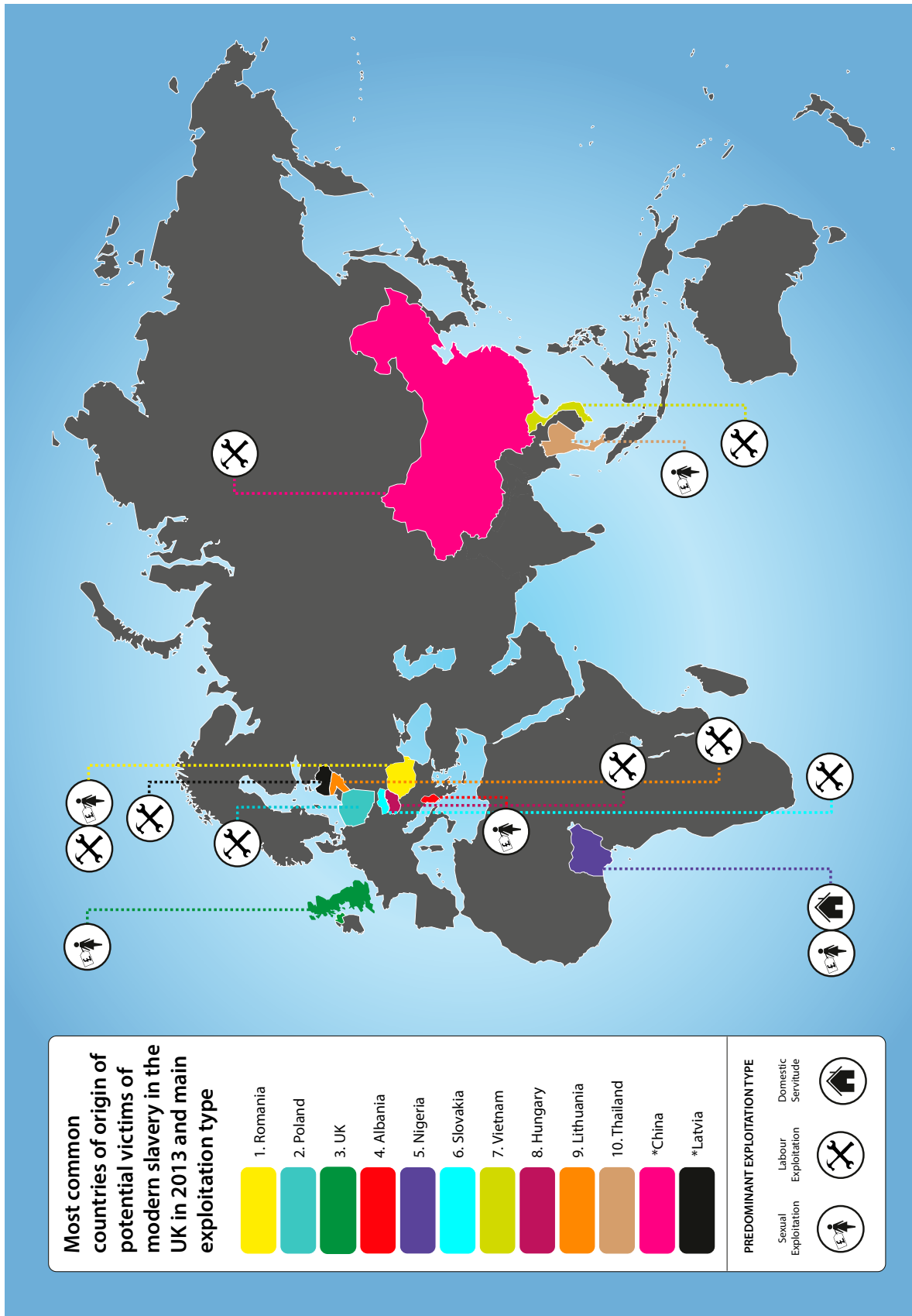
**2.28** In 2013 potential victims of modern slavery from 112 countries were referred to the NRM. The five most common countries of origin were Albania, Nigeria, Vietnam, Romania and the UK. Together, these five countries represented almost half (47%) of all potential victims. There has been a large increase in the number of potential victims from a number of EU countries (Poland,

Hungary, Lithuania and Latvia) and Albania (see box) referred to the NRM between 2011 and 2013. The top 10 countries of origin for potential victims identified by the NCA Strategic Assessment shows a broadly similar pattern to the top 10 countries of origin for potential victims referred to the NRM.

**2.29** There are clear differences in the main form of reported exploitation associated with the nationalities of potential victims. In 2013, the majority of potential victims from Albania, Nigeria and the UK referred to the NRM were women or girls who reported sexual exploitation, while the majority of potential victims from eastern and central European countries such as Romania and Poland were men reporting labour exploitation. Forty-two per cent of potential victims from Vietnam were children and the majority of Vietnamese children reported labour exploitation.







Source: NCA Strategic Assessment (2013), NRM Statistics (2013)  
 \*China and Latvia appeared in the top 10 countries of origin for potential victims referred to the NRM but did not appear in the top 10 countries of origin for potential victims identified by the NCA Strategic Assessment in 2013.

### Potential victims identified from Albania

There has been a large increase in the number of potential victims from Albania referred to the NRM – accounting for 30% of the overall increase in referrals between 2011 and 2013. In this period, the number of Albanian potential victims has increased from 32 to 270. The majority (84%) of Albanian potential victims reported they were subjected to sexual exploitation – and notably, over half reported they were exploited overseas rather than in the UK. In 2013, just under one-quarter (23%) of Albanian potential victims referred to the NRM received a positive conclusive decision that they were victims of human trafficking. This is similar to the proportion of potential victims receiving positive conclusive decisions from other non-EEA countries.

We have been working in close partnership with the Albanian authorities to understand and respond to this increase. This includes introducing specific arrangements to support victims and help them return home safely. There is intelligence that suggests some individuals are coming to the UK and claiming to have been subjected to sexual exploitation elsewhere in Europe because they believe that it will help their claim for asylum in the UK. We are working to reduce any possible abuse of the system.

## Perpetrators of modern slavery crime

**2.30** Historically there have been very few prosecutions for modern slavery offences in the UK and across the EU<sup>12</sup>. Increasing the numbers of prosecutions and convictions is a key aim which we believe can be achieved through the successful implementation of this Strategy and the legislative improvements that will be enacted through the Modern Slavery Bill.

**2.31** Data from the Crown Prosecution Service shows that in 2013/14, 226 prosecution cases were flagged as involving human trafficking offences<sup>13</sup>, more than double the number of flagged cases in 2010/11 (103 cases).

<sup>12</sup> Eurostat (2013) *Trafficking in human beings* [http://ec.europa.eu/dgs/home-affairs/what-is-new/news/news/2013/docs/20130415\\_thb\\_stats\\_report\\_en.pdf](http://ec.europa.eu/dgs/home-affairs/what-is-new/news/news/2013/docs/20130415_thb_stats_report_en.pdf)

<sup>13</sup> The human trafficking flag was introduced in 2010/11 and is applied to cases referred to the CPS as human trafficking offending, which may be charged as a human trafficking offence or as another offence. The flag is applied at the onset of a case and remains in place even if the charges are subsequently amended or dropped.

**2.32** There are strong links between modern slavery and organised crime. We know that a large number of active organised crime groups are involved in modern slavery crime. The actual number is difficult to determine, particularly as there may be overlaps between gangs carrying out human trafficking and those facilitating people smuggling. Many of the organised crime groups are family or clan based, with strong codes of conduct and familial links. Many are also involved in other forms of organised crime.

**2.33** The criminal network that facilitates modern slavery crime usually follows the same basic structure, with the process often following a number of stages:

- *Recruiters* who recruit vulnerable people as victims, often through the use of coercion and/or deception.
- *Transporters* who transport victims within a country and/or across borders (though not all modern slavery crime involves movement).
- *Exploiters* who force or coerce victims into modern slavery, including for sexual

exploitation, labour exploitation, criminal exploitation and domestic servitude.

**2.34** Traffickers involved in the recruitment phase are often of the same nationality as their victims, but at other stages of the process organised crime groups increasingly use the services available to them, regardless of nationality, in order to maximise profitability.

**2.35** However, not all modern slavery crime is perpetrated by organised criminal gangs. We know that some perpetrators are opportunistic individuals, who take advantage of the vulnerable. Some modern slavery crime is carried out through informal arrangements by individuals known to, and in some cases related to, the victim. This is particularly true of those who subject victims to domestic servitude. As the 2013 NCA Strategic Assessment highlights, domestic servitude

victims continue to be brought to the UK by their families or friends of their families with the promise of a better life.<sup>14</sup>

### **Case Study – Slave driver: Audrius Morkunas**

A Lithuanian national, Audrius Morkunas, arrived in East Anglia in 2009 and used his dominating physical presence to act as an unlicensed gangmaster.

Morkunas built up an organised crime group and for the next three years he controlled a number of victims, including one example where he forced victims to work in a chicken processing factory and bullied the factory owner to employ them. He demanded rent and charged each worker for transport he provided. He also charged £400 for finding them 'work'. The victims invariably built up a debt to Morkunas that he used to exploit and control them.

Morkunas displayed aggression and used violence to control many of the victims. He also controlled the bank accounts that they opened, as well as taking control of many of their identity documents, including passports and driving licences.

After being found to have produced and used a forged GLA licence<sup>14</sup>, Morkunas was convicted in December 2013 and received a seven year sentence for acting as an unlicensed gangmaster, seven years for money laundering and 18 months for assault (the assault charge resulted from him beating a worker with an iron bar).

<sup>14</sup> A GLA licence is required to provide workers for roles in the fresh produce supply chain. This ensures labour providers (gangmasters) and businesses who use the workers meet the employment standards required by law. Supplying workers into the GLA sector with no licence is a criminal offence.

## Our Strategic Response

**3.1** This Strategy sets out the Government's comprehensive approach to tackling modern slavery and the contributions we expect from Government departments, agencies and partners. Our aim is to reduce significantly the prevalence of modern slavery in the UK, as well as to enhance our international response.

**3.2** We are clear that we can only achieve this through all partners working together in a coordinated and strategic manner. Effective partnership is crucial. The crime of modern slavery requires a response across Government and beyond. This includes a determined and focused law enforcement response, greater awareness among frontline professionals, coordinated international activity, close working with the private sector and support from communities. We are also clear that we must build on and develop partnership working with civil society and faith groups across our entire strategic response.

**3.3** This Strategy builds on and adapts the framework that has been successfully implemented in both our serious and organised crime and counter terrorism strategies. It is a framework that we know works effectively and one that Government departments and agencies are now experienced in using.

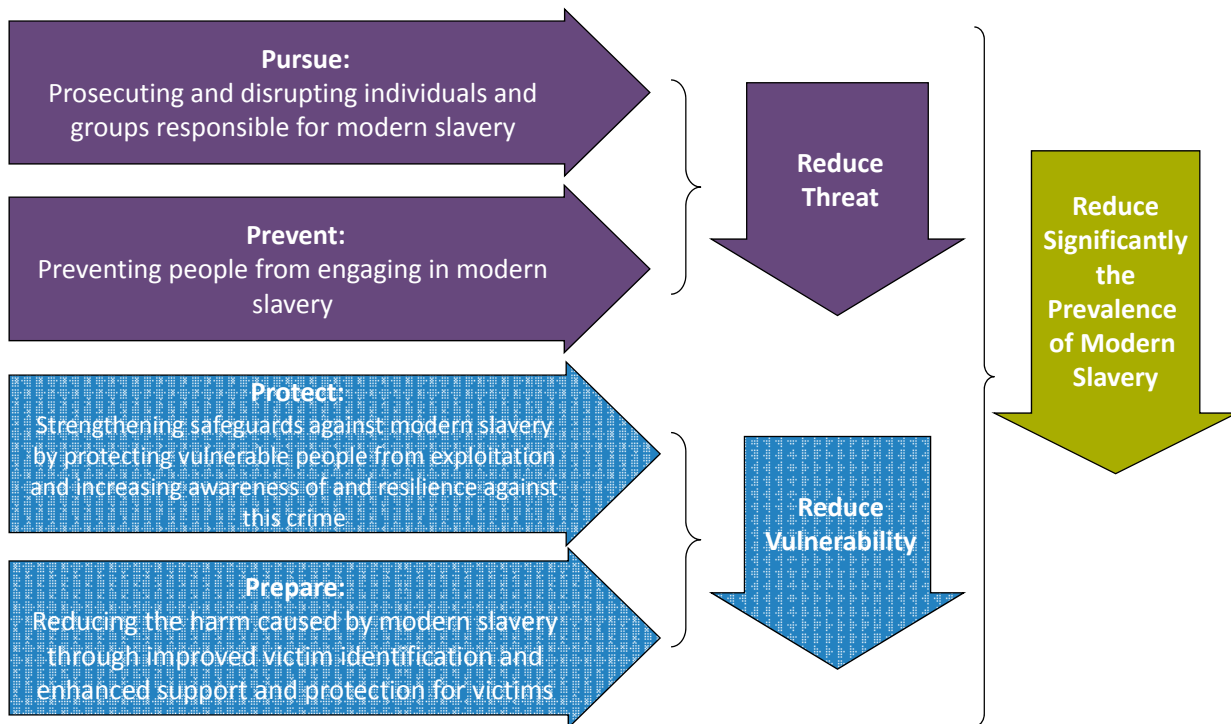
**3.4** However, modern slavery is also unique. In few other crimes are human beings used as commodities over and over again for the gain of others. Victims

endure experiences that are horrifying in their inhumanity, including violence, rape, hunger and abuse. These are individuals who have often experienced other forms of abuse, exploitation, poverty or poor health prior to being enslaved. Their vulnerabilities are multiplied many times over by their experiences at the hands of traffickers and slave drivers. Stripped of their freedom and often exploited for profit, the damage inflicted on victims is incalculable. Each stage of the trafficking and enslavement process can involve physical, sexual and psychological abuse and violence, deprivation and torture, the forced use of substances, manipulation, economic exploitation and abusive living and working conditions.<sup>15</sup>

**3.5** A victim-centric approach runs through all aspects of this Strategy. This means a focus on preventing vulnerable children and adults from becoming victims in the first place, improving the proactive identification of victims and enhancing the support provided to them, as well as working closely with civil society organisations that support victims in our efforts to bring traffickers and slave drivers to justice.

<sup>15</sup> United Nations Office on Drugs and Crime, *Toolkit to Combat Trafficking in Persons*

### 3.6 Our Strategy has four main areas:



**3.7** Actions we take under Pursue and Prevent are intended to reduce the threat from modern slavery crime through disruption and deterrence. We are clear that we will target all modern slavery offenders, from those involved in organised crime groups to individual opportunistic offenders. Actions taken under Protect and Prepare are intended to reduce overall vulnerability to modern slavery, through protecting vulnerable people, raising awareness and resilience and improving victim identification and support. Together these actions will enable us in the long term to reduce the incidence of modern slavery.

**3.8** Through utilising this model we will ensure that internationally recognised themes of best practice in tackling modern slavery and supporting victims are embedded throughout our response. Regional partnerships and networks will continue to be very important in coordinating activity

and promoting best practice. We are also clear that we must dramatically improve our response to organised child sexual exploitation, including child trafficking.

**3.9** It is important to recognise that other coordinated work underway across Government will make a significant contribution to tackling modern slavery. This Strategy references the work of the National Group on Sexual Violence against Children and Vulnerable Adults in a number of places. The new Panel Inquiry into Child Sexual Abuse will also consider whether and the extent to which public bodies and other important institutions have taken seriously their duty of care to protect children from sexual abuse. The Panel's findings will further inform our response. Our Strategy is also coordinated with work currently being undertaken to tackle the exploitation of foreign national workers across the country, including modern slavery crime.

**3.10** A key part of our strategic response is the establishment of a new Independent Anti-Slavery Commissioner. The Commissioner will have a UK-wide remit, ensuring that modern slavery issues are tackled in a coordinated and effective manner across the whole of the UK. The Commissioner will work closely with law enforcement agencies, local authorities and third sector organisations to encourage good practice in the identification of victims and the prevention, detection, investigation and prosecution of modern slavery crimes, including collaboration with international partners.

**3.11** The Commissioner will also work closely with the Inter-Departmental Ministerial Group (IDMG) on Modern Slavery, whose remit is to oversee and coordinate anti-modern slavery efforts across the UK and bring about important and necessary change at the right level. This group also performs the role of national rapporteur as set out in the EU Directive on preventing and combating trafficking in human beings and protecting its victims.

**3.12** We are also committed to stepping up our international response to modern slavery. We will:

- Annually identify priority countries, which will include both countries from which significant numbers of victims are trafficked to the UK, as well as additional countries that suffer disproportionately from a high incidence of modern slavery.
- Prioritise activity to tackle modern slavery in these countries by working with foreign governments and civil society organisations. British Embassies and High Commissions will develop Modern Slavery Priority Country Plans, which will include activities from the different elements of our strategic response: Pursue, Prevent, Protect and Prepare.

- Work with both international and locally based partners, including the Roman Catholic Church, the Church of England and the wider Anglican Communion, Rotary International, and other expert civil society organisations, to provide a programme of support and advice to British Embassies and High Commissions to tackle modern slavery.
- Raise the profile of modern slavery through the Commonwealth and EU institutions and work with partner governments to implement positive changes in laws and practices.
- Work to ensure that global action to end modern slavery is prioritised in the UN post-2015 development agenda.

**3.13** The Foreign and Commonwealth Office (FCO) will play a key role in this work and the Foreign Secretary will report progress annually on activity within FCO responsibility to the IDMG on Modern Slavery.

**3.14** We also know that we must continue to develop our understanding of the scale and nature of modern slavery in the UK so that we can effectively tackle it. This work will inform all elements of our strategy. To address this:

- The National Policing Lead for Modern Slavery will develop a process to consolidate information from each police force into one national overview of modern slavery and will introduce a framework for analysing information and intelligence within forces.
- The National Policing Lead will also work with NGOs and law enforcement agencies to develop debriefing tools which can be used to capture the experiences of victims; this will enable us to further our understanding of modern slavery and share this knowledge with partners.

- Through the Modern Slavery Bill we will create a statutory duty for specified public bodies to provide notification about potential victims of modern slavery that they encounter. Adult victims will be able to remain anonymous should they wish to do so.

# PURSUE: Prosecuting and disrupting individuals and groups responsible for modern slavery

Success in PURSUE will mean:

- At home, the disruption of criminals responsible for modern slavery, including their prosecution.
- Overseas, effective international collaboration drawing on all available resources to disrupt modern slavery criminality.

Our objectives are to:

- i. Utilise strong organisations and effective collaboration to lead work to tackle modern slavery;
- ii. Develop and utilise new and existing capabilities to detect, investigate, prosecute and otherwise disrupt modern slavery crime;
- iii. Attack criminal finances by making it harder for slave drivers and traffickers to move, hide and use the proceeds of crime;
- iv. Ensure that effective legal powers are available and are used to deal with the threat of modern slavery; and
- v. Internationally, improve our own capabilities and cooperation with international partners to better target organised criminal networks operating across international borders.

## Utilise strong organisations and effective collaboration to lead work to tackle modern slavery

**4.1** Our Serious and Organised Crime (SOC) Strategy<sup>16</sup> set out the model for tackling all forms of serious and organised crime in the UK. We will use the full force of this model to tackle modern slavery effectively at all levels. Locally through to

internationally, strong and coordinated law enforcement structures will be utilised to achieve a step change in our response to this abhorrent crime.

### National

**4.2** The National Crime Agency (NCA) was established in October 2013 to lead the UK's fight to cut serious and organised crime. The agency has a stronger mandate to tackle serious and organised crime nationally than any organisation has had before. The Home Secretary has made tackling modern slavery

<sup>16</sup> HM Government (2013) *Serious and Organised Crime Strategy*: <https://www.gov.uk/government/publications/serious-organised-crime-strategy>



### Case Study: Effective partnership action

Joint action by the National Crime Agency's UK Human Trafficking Centre (UKHTC) and the Gangmasters Licensing Authority (GLA) prevented the possible trafficking of 150 people from Poland for exploitation in the UK.

The GLA received intelligence that Polish nationals were being offered transport, accommodation and employment in the UK with a soft fruit company. Enquiries by the GLA revealed that the company had no vacancies, nor did it anticipate having work for an additional 150 workers in the near future.

The UKHTC and GLA therefore suspected that there was an intention to recruit and debt bond the workers in the UK. These potential victims could then be exploited in a number of ways, including forced labour, benefit fraud and forced criminality.

Within 24 hours of receiving the intelligence, the UKHTC liaised with the NCA International Liaison Officer (ILO) in Poland, the Polish Human Trafficking Centre and National Crime Squad to successfully disrupt the crime group's plan to transport the potential victims to the UK by coach.

This prompt action was possible because some months previously the UKHTC had identified an increasing threat to the UK from Polish crime groups involved in human trafficking for labour exploitation. This prompted the UKHTC to initiate liaison with the NCA ILO in Warsaw and the relevant Polish law enforcement organisation to prevent potential victims being trafficked from Poland for exploitation in the UK.

a priority for the NCA, as outlined in the Agency's 2014/15 Annual Plan<sup>17</sup>.



**4.3** The NCA will lead, support and coordinate the law enforcement response to modern slavery. Under the NCA's National Control Strategy, modern slavery has been identified as the highest priority level of threat.

**4.4** The Gangmasters Licensing Authority (GLA) investigates labour exploitation in the UK, working in collaboration with other

agencies, such as HM Revenue and Customs on National Minimum Wage enforcement, and is responsible for regulating the activities of gangmasters in the agriculture, horticulture, shellfish gathering, food and drink processing and packaging sectors.

**4.5** In April 2014 the GLA became part of the Home Office, strengthening its enforcement and intelligence capabilities by:

- Providing the GLA with a single point of contact in the NCA Intelligence Hub and in Home Office Immigration Enforcement intelligence.
- Enabling GLA investigators to access the College of Policing accredited training developed for Immigration Enforcement investigators.

<sup>17</sup> NCA Annual Plan 2014/15 <http://www.nationalcrimeagency.gov.uk/publications/176-nca-annual-plan-2014-15/file>

- Facilitating close partnership working with the NCA on a project to tackle organised crime groups involved in trafficking for labour exploitation across the European Union.

**4.6** The GLA's response to modern slavery and worker exploitation will be further strengthened through new Better Business Compliance Partnerships (detailed later in this chapter), a review of licensing standards, and work with businesses in their regulated sectors on supply chains.

**4.7** The majority (60%) of potential victims referred to the NRM in 2013 who reported having experienced labour exploitation were from EU countries. The GLA will continue to develop partnerships with labour inspectorates across Europe focused on the sharing of information as well as conducting joint operations to prevent exploitative practices from occurring.

**4.8** We will lead a project with the support of the GLA to bring together enforcement agencies from across the EU into a forum to share information and trends about threat risks to vulnerable workers. The aim of the forum will be to share best practice and intelligence in order to better inform operations aimed at both preventing people from being subjected to criminal mistreatment and pursuing the criminals responsible, particularly in countries from which we know many victims are trafficked to the UK, as well as in the UK itself. For example, the GLA is aware of an increasing trend whereby criminals simultaneously subject victims to both forced labour and criminal exploitation (i.e. victims are forced to steal in addition to being forced to work). This new forum will seek to identify practical measures to prevent and mitigate against this, supporting law enforcement where appropriate.

**4.9** HM Revenue and Customs (HMRC) will strengthen its response to modern slavery

by appointing a Modern Slavery Strategic Lead. The Strategic Lead will devise a new action plan for HMRC, which will improve the coordination of HMRC operations where modern slavery is suspected to be taking place and ensure effective liaison with other Government agencies.

## Regional

**4.10** Regional Organised Crime Units (ROCU) are responsible for coordinating and supporting the regional response to serious and organised crime. Our Serious and Organised Crime Strategy made clear that ROCUs have an important leadership role in facilitating information sharing across agencies and departments on serious and organised crime, primarily through the Government Agency Intelligence Network (GAIN). This includes modern slavery crime, and we expect ROCUs to play a key role in gathering and managing the intelligence flow from local police forces to the NCA in support of better understanding of this crime. ROCUs will also continue to support and coordinate operations to tackle modern slavery crime, where activity crosses force boundaries or has been raised as a priority through the national tasking and coordinating mechanisms led by the NCA.

## Local

**4.11** Modern slavery takes place in communities across the country and local police forces have a key role in identifying and combatting it. The National Policing Lead for Modern Slavery will work to raise strategic awareness across all 43 police forces in England and Wales and will develop a new national action plan to help police forces work together to combat all forms of modern slavery by developing prevention arrangements, strengthening support and protection of victims and improving the identification, disruption and prosecution of offenders.

#### 4.12 This will:

- Support Police and Crime Commissioners and Chief Constables in reviewing their approach to tackling modern slavery, ensuring it responds to the local threat and is reflected within their own policing plans and strategies.
- Promote a requirement that those officers and staff responsible for tackling modern slavery (for example, first responders and investigators) have received appropriate training, drawing on the training packages developed by the College of Policing.
- Strengthen the existing Single Point of Contact (SPOC) network for modern slavery, which is already in place in every police force in England and Wales, with new guidelines on carrying out the role effectively.
- Ensure that maximum use is being made of local partnerships, drawing in contributions from other partners, including NGOs, to share expertise and information to strengthen the local response and support victims.

**4.13** A key responsibility for the new Independent Anti-Slavery Commissioner will be to work closely with police forces, supporting and challenging them to improve their work to tackle modern slavery.

**4.14** In addition to this Her Majesty's Inspectorate of Constabulary (HMIC) will lead a joint inspection (with all criminal justice inspectorates<sup>18</sup>) on modern slavery as part of the 2014-2016 criminal justice joint inspection programme to establish how police forces are responding.



**4.15** We will also encourage local authorities to proactively inspect houses of multiple occupation and work collaboratively with the GLA in order to identify accommodation under the control of gangmasters, which may be used to house victims in debt bondage.

#### The UK border

**4.16** Organised crime groups look to exploit our border security arrangements but the border also provides an opportunity for law enforcement to intervene against trafficking networks. The Border Policing Command (BPC) of the NCA now leads, supports and coordinates partners at the UK border in a multi-agency response to tackling international modern slavery crime before it reaches the UK. BPC Investigation Officers are a visible presence at our border and the

<sup>18</sup> Including Her Majesty's Inspectorate of Prisons, Her Majesty's Inspectorate of Probation and the Crown Prosecution Service

BPC also liaises with maritime and aviation partners, including private industry, to drive forward law enforcement activity against modern slavery and other forms of serious and organised crime.

**4.17** Border Force, a Home Office law enforcement command, works to secure the UK border by carrying out immigration and customs controls for people and goods entering the UK. Border Force has now established its own dedicated programme of activity to tackle modern slavery, which is referenced in the Protect and Prepare chapters of this Strategy.

**4.18** Home Office Immigration Enforcement also has teams based at major airports and ports across the UK, who act as first responders to referrals from Border Force on human trafficking, facilitation and document abuse crime. Both border-facing and inland teams (based across 23 locations) will work in close partnership with the NCA to investigate and disrupt organised crime groups involved in modern slavery crime.

### Develop and utilise new and existing capabilities to detect, investigate, prosecute and otherwise disrupt modern slavery crime

**4.19** Tackling modern slavery does not require law enforcement agencies to develop an entirely new set of tools or approaches, but it does require that they deploy, refine and build upon a wide range of existing capabilities and work effectively with key partners, including NGOs. This means bringing together the expertise and empathy required to work with the most vulnerable victims with the most advanced and sophisticated approaches to tackling serious and organised crime.

**4.20** At the national level the NCA will lead, support and coordinate work to tackle modern slavery. In that role, the NCA will:

- Continue to provide tactical advice and expertise through both the UK Human Trafficking Centre (UKHTC) and the Child Exploitation Online Protection (CEOP) Command to UK law enforcement partners, protecting victims and supporting investigating teams, including in relation to child sexual exploitation and missing children operations.
- Improve knowledge of how the internet is used to facilitate modern slavery, helping to disrupt internet infrastructure used by serious and organised criminal groups.
- Develop and build specialist investigative capabilities and knowledge in modern slavery investigations.



**4.21** In addition to the work of CEOP, there is a wide range of other activity underway to support police forces in improving their response to organised child sexual exploitation.

**4.22** The National Policing Lead for Child Protection and Abuse Investigations has written to each police force to offer guidance and to benchmark their delivery against a new action plan to tackle child sexual exploitation. To support this the National Policing Lead has circulated a refreshed version of the national policing child sexual exploitation action plan. The delivery of the action plan is critical in supporting our national capability to tackle child sexual exploitation. This will help to prevent child sexual exploitation from taking place, ensure that reports from victims continue to be acted on effectively, and maximise opportunities to stop further offending. This work is supported by new guidance and training for those responsible for investigating child abuse, including the new College of Policing Approved Professional Practice guidance for investigators, published in January 2014, and the new guidance for prosecutors, published in October 2013 by the Crown Prosecution Service.

### Partnership working and intelligence sharing

**4.23** We need to improve our intelligence on modern slavery if we are to tackle it successfully. At all levels of our response, Government departments and agencies will work collaboratively, sharing operational assets and intelligence to combat modern slavery.

**4.24** The NCA is responsible for ensuring that effective arrangements are established to enable the gathering and sharing of intelligence, so that partners can share information safely, securely and efficiently, and that this directs the operational response by law enforcement. To enable this the NCA will:

- Establish a new 'Fusion Hub', bringing key partners into a single multi-agency hub to share intelligence on organised crime, including modern slavery, and

to share specialist knowledge, develop combined tactical assessments and drive operational outcomes.

- Develop a dedicated modern slavery capability within its Intelligence Hub to improve our assessment of the modern slavery threat in the UK.
- Lead work to increase intelligence gathering and sharing in relation to modern slavery, working with ROCUs, police forces and other law enforcement agencies.

**4.25** At a regional level ROCUs will proactively draw intelligence up from police forces and other local partners to map the regional picture. Government Agency Intelligence Network (GAIN) coordinators within ROCUs will work to ensure that both strategic and tactical intelligence on modern slavery is proactively shared amongst the core membership of GAIN (which includes police, national law enforcement agencies and other relevant agencies, such as Trading Standards).

**4.26** Local partnership working is essential to the success of both this Strategy and our Serious and Organised Crime Strategy and we expect police forces to use and build on the range of existing partnership structures to support their work to tackle modern slavery. In particular, forces should be using these structures to support close working with NGOs.

**4.27** Stronger multi-agency arrangements are being established to coordinate and share intelligence in relation to vulnerable victims. Multi Agency Safeguarding Hubs (MASHs) are being set up across the country and are helping agencies share information, coordinate more effectively and safeguard children and vulnerable adults from harm.

**4.28** The Home Office published a report<sup>19</sup> in July 2014 which found that multi-agency working was key to early and effective identification of risk and that it enabled earlier intervention, improved information sharing and improved case management, as well as joint decision-making and coordinated action. The report also highlighted the core features of effective multi-agency models.

**4.29** The Home Office is supporting continued roll-out and development of these hubs by:

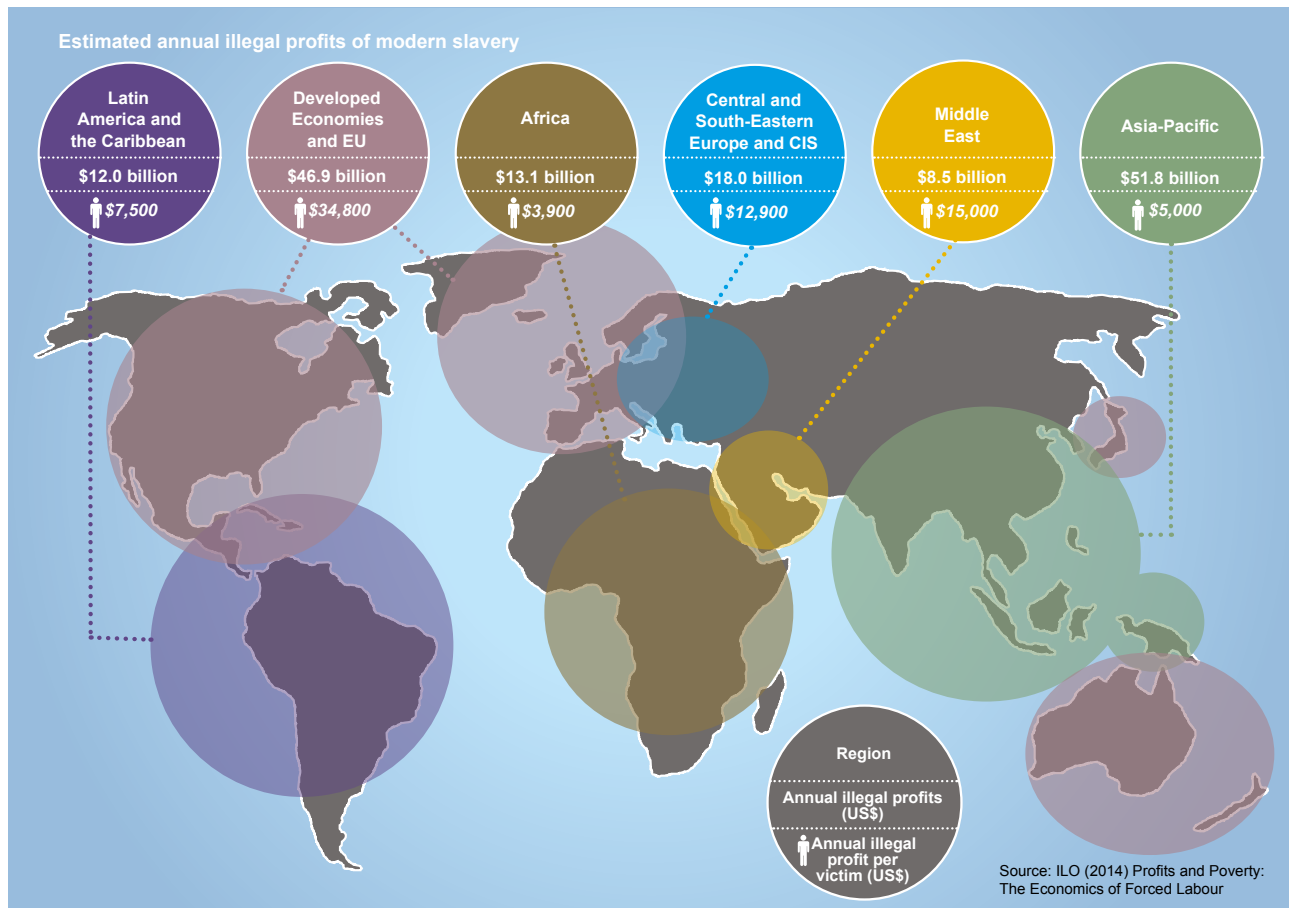
- Delivering a series of events to build on the findings of the report by sharing best practice and encouraging peer to peer learning through support networks; and
- Commissioning the Centre of Excellence for Information Sharing to work with local areas to provide targeted support to MASHs to improve information sharing and disseminate the learning more widely.

**4.30** New Better Business Compliance Partnerships are being established as part of this Government's programme of work to tackle illegal working practices and the exploitation of workers. The partnerships, operating in five areas, are examining ways to improve cross agency working by sharing information and coordinating prevention and compliance action across a range of areas, such as employment law, immigration and Trading Standards. This will ensure that inspectors and officers from across local and national government work together in a more coordinated way to make sure that businesses who break the rules on pay or safety or employing those here illegally are caught.

**4.31** At ports and airports we are establishing Joint Border Intelligence Units (JBIUs) to ensure that intelligence gleaned from interventions at the border is developed and shared across a wide range of law enforcement agencies, including the NCA, Border Force, police, Home Office Immigration Enforcement, HMRC and the GLA. This action will help identify and prosecute those organised criminals who attempt to exploit the UK border, and help coordinate the law enforcement response to the detection of potential victims of human trafficking.

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<sup>19</sup> Home Office (2014) *Multi Agency Working and Information Sharing Project Final Report*: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/338875/MASH.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/338875/MASH.pdf)



## Attack criminal finances by making it harder for slave drivers and traffickers to move, hide and use the proceeds of crime

**4.32** Modern slavery is believed to be one of the world's largest international crime industries. The International Labour Organization (ILO) estimates that the total illegal profits obtained from the use of forced labour worldwide amount to over US \$150 billion per year.<sup>20</sup> The ILO believes that the annual profit per victim made by criminal exploiters is by far the highest in developed economies, including the EU, amounting to

US \$34,800 per victim. Modern slavery is one of the very few crimes where human beings are the commodity, and is viewed as particularly lucrative by criminals because victims can be used and sold over and over again, generating a continuous source of income.

**4.33** We will attack the illegal profits made by slave drivers and traffickers through the use of financial investigation tools and asset recovery powers. This will be an important part of our efforts to make the UK a hostile country for modern slavery. Over £2 million has been recovered from slave drivers and traffickers in the past four years but we are determined to do more.

**4.34** We will strengthen and improve the legal frameworks for confiscating the proceeds of crime, making it harder for

<sup>20</sup> ILO (2014) *Profits and Poverty: The Economics of Forced Labour*: <http://www.ilo.org/global/topics/forced-labour/publications/profits-of-forced-labour-2014/lang--en/index.htm>

criminals to move, hide and use the proceeds of crime. We will:

- Use the Serious Crime Bill to amend the Proceeds of Crime Act (POCA) 2002 and enable law enforcement agencies to recover criminal assets more quickly, close loopholes that criminals use to exploit the asset recovery process, and crack down on those who try to avoid paying their confiscation orders.
- Use the Modern Slavery Bill to make the offence of slavery, servitude and forced or compulsory labour a ‘criminal lifestyle’ offence for the purposes of POCA, ensuring that perpetrators are subject to the toughest confiscation regime available. The existing human trafficking offences are already criminal lifestyle offences and the new consolidated human trafficking offence will also be one.

**4.35** The NCA will strengthen its operational capabilities in order to deliver a step change in the value of assets restrained and recovered through criminal confiscation, civil recovery and tax mechanisms. The NCA will work with partners to build a community of skilled and experienced economic crime professionals, across law enforcement and the private sector, capable of delivering this change. Key areas of expertise will include: forensic accountancy, financial investigation, the use of taxation to tackle criminality, together with civil and criminal asset recovery. The NCA will also give greater focus to tackling money laundering, which enables a wide range of criminality, including modern slavery.



**4.36** The National Policing Lead for Modern Slavery will promote the use of specific asset recovery powers among police forces. It is crucial that, where possible, financial investigations start as soon as the criminal investigation begins. Restraint orders can be applied for as soon as a criminal investigation has started, which means that assets can already be frozen quickly.

**4.37** The Home Office administers the Asset Recovery Incentivisation Scheme, which deals with the proceeds of crime that are recovered from criminals and channels those funds to the departments and agencies involved in the fight against organised crime. Seized assets are already distributed to the police and other law enforcement agencies that use the powers under POCA. However, our first priority are the victims of this crime, so the first call on the proceeds recovered from a slave driver or trafficker will be to pay reparations to victims. The new reparation orders that we are introducing through the Modern Slavery Bill are detailed in the Prepare chapter.

**4.38** The Crown Prosecution Service’s Specialist Fraud Division brings together prosecutors dealing with the most serious and complex fraud and corruption cases stemming from criminal investigations conducted by the NCA, HMRC, the



Department for Work and Pensions and the GLA. Prosecutors with expertise in proceeds of crime and organised crime will consider alternative strategies to prosecute, restrain and confiscate assets in order to disrupt organised criminals.

**4.39** However, the proceeds of modern slavery crime are usually dispersed across extended international facilitation networks. This means that the money is rarely concentrated in the hands of one individual and is often held outside the UK.

**4.40** In order to address this the Crown Prosecution Service will:

- Work with Government departments and law enforcement partners, including the NCA and HMRC, to identify priority countries for asset recovery.
- Deploy Asset Recovery Advisors (ARAs) to priority jurisdictions as part of the Asset Recovery Strategy. ARAs will assist with casework, investigations and improving the operational environment to drive up performance on asset recovery at home and abroad.

**4.41** The improvements that we are making through the Modern Slavery Bill and the Serious Crime Bill, together with our non-legislative actions, should lead to more assets being confiscated from criminals, which in turn should lead to more funds being directed to victims and those agencies leading the fight against crime.

### Ensure that effective legal powers are available and are used to deal with the threat of modern slavery

**4.42** It is vital that we have a legal framework in place which supports law enforcement in pursuing the perpetrators of modern slavery. The framework must be

easy for law enforcement and prosecution authorities to use and must ensure that the courts have the sentencing powers they need to ensure those found guilty of these offences receive the punishment they deserve. To address this, we will use the Modern Slavery Bill to:

- Consolidate, simplify and improve the existing criminal offences related to modern slavery. The current modern slavery and human trafficking offences are contained in a number of different Acts. Consolidating and simplifying existing offences into a single Act will make it easier for law enforcement and prosecutors to understand and use effectively.
- Ensure that those convicted of these offences can be sentenced to life imprisonment.
- Ensure those who commit an offence with the intention of facilitating human trafficking can be appropriately prosecuted and brought to justice – for example, those who supply false documents to facilitate trafficking.
- Provide law enforcement officers with additional powers when investigating modern slavery offences at sea.



**4.43** It is crucial that the seriousness and complexities involved in cases of modern slavery, including the abuse of vulnerable victims, are understood and dealt with effectively in the criminal justice system.

**4.44** All modern slavery cases will now be referred for allocation to trial judges under a new Criminal Practice Direction that came into force in October 2014. This means that modern slavery cases will be referred to the Presiding Judge for allocation and can only be tried by High Court and Circuit Judges or Deputies, providing that the presiding judge has released it to them. This will ensure that only judges with relevant experience will preside over these often lengthy and complex trials and will improve consistency in case management at court.

**4.45** To ensure that perpetrators receive the punishment that modern slavery crimes deserve we have already included the existing modern slavery offences in the Unduly Lenient Sentences regime to ensure that the Attorney General can challenge any sentence which does not reflect the severity of the crime committed and we will ensure that the new offences in the Modern Slavery Bill are also included.

## Internationally, improve our own capabilities and cooperation with international partners to better target organised criminal networks operating across international borders

**4.46** We are committed to working with our international law enforcement partners to ensure that we are taking every opportunity to pursue and disrupt those committing modern slavery offences. To achieve this, we will continue to raise the profile of modern slavery internationally and to highlight the essential contribution of law enforcement. We will do this by:

- Using the new Modern Slavery Priority Country Plans to drive increased law enforcement cooperation and greater proactive work to pursue the perpetrators, ensuring that we maximise the contribution of our assets within those countries.
- Using our international law enforcement networks (including the NCA and CPS networks) to increase cooperation with international partners to better investigate and prosecute cases of modern slavery in source, transit or destination countries.
- Continuing to lead and support the Santa Marta Group, launched in April 2014 by Pope Francis, which brings together senior international law enforcement chiefs and representatives of the Roman Catholic Church to strengthen and coordinate the response to tackling modern slavery globally. London will host the next conference in December 2014, with further events planned in Spain and Ireland in 2015.



**4.47** Modern slavery is often an international crime and a strong and coordinated international response is vital. The UK is a member of both the Interpol and Europol multinational law enforcement agencies. Interpol is a network of police agencies in countries worldwide, whereas Europol mainly supports EU Member States. We are committed to working closely and collaboratively with both organisations. Via the Interpol National Central Bureau and the Europol National Unit, which are part of the NCA, these agencies provide invaluable secure intelligence exchange platforms for communication with trusted international partners. This means international intelligence is gained to both support ongoing UK operations and to initiate new investigations in the UK. We will work with Interpol, Europol and their member countries to encourage greater sharing of intelligence and data to better inform the international picture of modern slavery.

**4.48** The NCA's Border Policing Command will ensure that intelligence from NCA assets overseas and multi-national law enforcement agencies is supported by the new NCA Fusion Hub and feeds into our understanding of the scale and nature of modern slavery. The NCA will also work with law enforcement partners across the EU to identify current threats and undertake joint operational activity through its leadership of the European

Union's European Multidisciplinary Platform against Criminal Threats (EMPACT) human trafficking work stream.

**4.49** With the support of Europol and Eurojust, an EU body that works to improve the coordination of investigations and prosecutions among EU Member States, we will continue to support the establishment of Joint Investigation Teams (JITs), which enable UK and European law enforcement partners to work in close partnership on operations. The Metropolitan Police Service in particular has used a number of JITs, for example with their Romanian and Slovakian counterparts, to support cross-border investigations leading to the effective prosecution and conviction of organised criminals involved in human trafficking. Recognising the importance of joint working to improve investigations and prosecutions, we will work with Eurojust to maximise the opportunities that JITs offer, by ensuring that more UK law enforcement agencies develop strong and effective bids for the limited funding on offer.

**4.50** We will also ensure that we make maximum use of our assets overseas. Our international response to tackling organised crime is led by the NCA International Liaison Officer (ILO) network, with officers based in over 45 overseas locations, providing direct engagement with over 100 countries. ILOs work with local partners to tackle all forms of serious and organised crime. Working collaboratively with the NCA, the Home Office Immigration Enforcement's Risk and Liaison Overseas Network (IE RALON) also has staff located across more than 50 locations globally who work to identify and target those involved in human trafficking. The CPS also has a network of approximately 20 specialist prosecutors in targeted locations across the world that work with NCA and other local and international law enforcement partners on casework and operational issues.

### Case Study: Joint Investigation Teams (JITs)

As part of an ongoing investigation, information was received by the Metropolitan Police Service (MPS) in late 2011 that Romanian nationals were being trafficked by an Organised Criminal Group (OCG) from Romania to the UK for the purposes of sexual exploitation. On many occasions the female victims involved were 'recruited' in Romania with the promise of legitimate paid work in the UK, such as care or secretarial work. Once the victims arrived in the UK they were informed that no such employment existed, their identity documents were taken by their traffickers and they were forced and threatened into sex work in order to pay off their debt. In July 2012 a Joint Investigation Team (JIT) was initiated between the MPS and the Romanian Organised Crime Branch with the assistance of Eurojust. From this point onwards real time intelligence was shared between the MPS and the Romanian authorities. This intelligence indicated that the OCG was at different times either bringing in female victims, travelling themselves or transporting money and goods out of the UK back to Romania via budget airlines, or using vehicles to cross Europe.

In March 2013 a joint coordinated arrest phase was carried out both in Romania and the UK. Ten people were arrested in Romania and were remanded in custody, facing charges of trafficking adults and children (one female victim was only 16 years old when brought to the UK), being part of an organised criminal group and money laundering. Two further persons who were wanted by the Romanians were later arrested by MPS officers on European Arrest Warrants after measures had been put in place to prevent them from fleeing the UK or obtaining travel documents. In June 2014, 12 members of the OCG received sentences ranging from 4-13 years imprisonment. In addition, property worth £200,000, including a new BMW X6, was confiscated by the Romanian authorities as property paid for using the proceeds of crime.

This JIT operation was very successful and resulted in the complete dismantling of an OCG in two EU states. Importantly, the details of this successful operation, including the arrests, length of sentences and amount of assets confiscated, were widely publicised in both the UK and Romania (an important part of our Prevent strategy, as detailed in the following chapter).

**4.51** To maximise the contribution of these assets:

- NCA ILOs in priority modern slavery countries, where we know large numbers of victims are trafficked from, will develop local modern slavery action plans (in coordination with our broader Modern Slavery Priority Country Plans).
- The NCA's Border Policing Command will work with the NCA ILO network to ensure the consistent flow of modern slavery intelligence between ILOs and the intelligence capability within the UK. This will include an increased focus on transit countries.
- The NCA will expand its engagement with international partners, including increased capacity building with partners in key source and transit countries.

- The CPS international network will work closely with the NCA to engage with international partners on casework and operational support to address source issues through capacity building.
- We will work across Government to identify the needs of and systemic blockages to international investigations and casework and we will deploy experts, including CPS Criminal Justice Advisors, to address those issues.
- IE RALON will work closely with the NCA and local law enforcement partners to identify and target those involved in human trafficking.

## PREVENT: Preventing people from engaging in modern slavery

Success in PREVENT will mean that:

- Fewer people, in the UK and overseas, engage in modern slavery crime in any of its forms.
- We prevent the facilitation of modern slavery crime and actively reduce reoffending.

Our objectives are to:

- i. Improve our evidence base on modern slavery offenders;
- ii. Deter people from engaging in modern slavery crime through raising awareness of the reality and consequences;
- iii. Prevent the facilitation of modern slavery crime;
- iv. Use interventions to stop people being drawn into modern slavery crime and deter offenders from continuing; and
- v. Utilise both the established offender management framework and new bespoke tools to deter reoffending.

**5.1** In our Serious and Organised Crime Strategy we made clear that we will not be able to tackle serious and organised crime by disruption and prosecution alone. This very much applies to tackling all forms of modern slavery crime. A key step is stopping people becoming involved in the first place, from those involved in organised crime groups to individual opportunistic offenders, as well as preventing and deterring offenders from continuing.

**5.2** We need to develop new techniques to prevent individuals being drawn into this type of criminality and deter those already involved from reoffending. We need to send a powerful message that anyone who does engage in modern slavery criminality will be pursued

relentlessly and that the consequences will be severe.

**5.3** A substantial element of the work to prevent and deter involvement in modern slavery will be taken forward by local partners. We believe that local serious and organised crime partnership arrangements should play an important role in coordinating work to prevent and deter involvement in modern slavery. We will support local efforts to implement Prevent approaches to modern slavery offenders.

## Improve our evidence base on modern slavery offenders

**5.4** In order to effectively target Prevent messages to potential perpetrators we need to improve our knowledge of the criminals who commit modern slavery crime. We will develop our understanding of modern slavery offenders through analysis of data sources, collaboration with academics and NGOs working in this area and by further reviewing existing literature.

## Deter people from engaging in modern slavery crime through raising awareness of the reality and consequences

### Publicity about our comprehensive programme of activity and operational successes and penalties

**5.5** The introduction of the Modern Slavery Bill and the wider comprehensive programme of activity set out in this Strategy are themselves a strong deterrent and we will continue to widely publicise the details of our actions. This activity sends a clear message, internationally, that the UK will not tolerate any form of abuse or exploitation of others. The strong cross-party support for a new Modern Slavery Act, and the positive steps planned by the Devolved Administrations, demonstrate that the UK is unified in its determination to stop this heinous crime.

**5.6** The Bill sends a strong message to potential perpetrators through ensuring that the maximum penalty for both the human trafficking offence and the slavery, servitude and forced or compulsory labour offence will be life imprisonment.

**5.7** We will also encourage law enforcement and other operational partners

to ensure that operational successes and the penalties handed down to perpetrators are widely publicised. Importantly, when we work on joint operations, we will encourage law enforcement partners overseas to publicise the sentences and penalties imposed (including details of asset seizures) within their countries, as well as publicising these details widely in the UK.

### Education programmes

**5.8** There is a wide range of factors which can encourage individuals from any country across the world to become involved in crime. Modern slavery is no exception. Individuals may perceive a lack of opportunity or choice or may have grown up in an environment where criminal behaviour was seen as the norm. Poverty, culture, peer pressure or social and economic instability may shape and determine the choices they make.

**5.9** Educational programmes can play an important role in challenging those attitudes and can deter people from becoming involved in crime in the first place. In the UK the Home Office will continue to work alongside the police and NCA with local groups to develop education resources which explain what serious and organised crime looks like and help people to understand the consequences of involvement in it. We will also work with NGOs and faith groups to target Prevent messaging to local diaspora communities that we believe might have links to foreign national perpetrators in the UK and in countries of origin.

**5.10** Internationally we will:

- Use the new Modern Slavery Priority Country Plans to develop targeted work overseas with key partners and local agencies to discourage potential perpetrators from getting involved in modern slavery.

- Identify the country specific underlying factors that drive perpetrators to commit modern slavery crime, such as poverty or cultural practices.

### Preventing child exploitation

**5.11** Child abuse and organised child sexual exploitation, including child trafficking, can take many different forms and are not exclusive to any single culture or community. The police will continue to work with other agencies to identify not only those at risk of exploitation and abuse but also people, convicted or not, who may pose a risk to children and vulnerable people.

**5.12** We will continue to work with community leaders to support messages to offenders and potential offenders emphasising that child abuse and exploitation are not tolerated in any culture, faith or belief. In order to work to prevent potential offenders becoming perpetrators of child sexual exploitation we have begun to develop a programme of direct engagement with communities to effect cultural change, focusing on ‘at risk’ and hard-to-reach communities. This work will also seek to deter those who are at risk of becoming involved in this type of crime by:

- Continuing to support capacity for ‘Stop it Now’ helplines for people who are at risk of being drawn into abuse.
- Reviewing the effectiveness of interventions for potential sexual offenders.

**5.13** We will also continue to progress work to improve our understanding and awareness of the risks in individuals and organisations. This will include supporting local authorities to improve information sharing processes.

## Prevent the facilitation of modern slavery crime

**5.14** Serious and organised crime requires a “support structure” that enables or facilitates it. The support structure for modern slavery can include both criminal and non-criminal individuals, organisations, businesses, websites and practices. In some cases enablers are aware of their involvement and are seeking to profit; in other cases they are unaware. We will target these facilitators with Prevent messaging to make them aware of the risks and consequences of involvement. We will crack down on criminals who facilitate modern slavery and will work with regulators and the private sector to prevent facilitation within the legitimate economy.

### Criminal facilitators

**5.15** We are taking a number of legislative steps to ensure that law enforcement and the courts have all the powers they need to tackle those who facilitate modern slavery. Regular convictions and heavy sentences, publicised widely, will deter those who might otherwise consider supporting modern slavery. We will:

- Include an offence in the Modern Slavery Bill to specifically target those who commit other offences to facilitate human trafficking, for example so that someone who steals a car to use it for human trafficking can receive a tougher sentence than an ordinary car thief.
- Create an offence of participating in the activities of an organised crime group, though the Serious Crime Bill, which will ensure that those who actively help organised crime groups (including those committing modern slavery crimes) can be appropriately prosecuted.



**5.16** We will also introduce new Slavery and Trafficking Prevention Orders and Slavery and Trafficking Risk Orders through the Modern Slavery Bill to give law enforcement and the courts the powers they need to prevent the harm caused by modern slavery offences. These orders are designed so that law enforcement bodies and the courts can respond flexibly to the risks posed by an individual of committing future modern slavery offences. This flexibility will enable law enforcement and the courts to respond and take action in relation to changing modern slavery practices, and to tailor prohibitions to the specific risk posed by an individual.

**5.17** The new Slavery and Trafficking Risk Orders (which do not require a previous criminal conviction) will be used, for example, to restrict the behaviour of those on the periphery of criminal organisations who play supporting roles in modern slavery crime, where there may be insufficient evidence to convict an individual but the risk is still clear.

### **Informing and alerting professionals and facilitators**

**5.18** Criminal groups involved in modern slavery crime launder money through the financial sector, or use the services of lawyers or accountants to invest in property or set up front businesses. A small number of complicit or negligent professionals, such as bankers, lawyers and accountants, can act as enablers between organised criminals and the legitimate economy.

**5.19** We are working with regulators to ensure that money-laundering prevention work is well-informed about contemporary organised crime, including modern slavery. We are also working to raise awareness of the reality and consequences of serious and organised crime amongst professional sectors that are targeted by serious and organised crime groups in order to prevent

professionals from knowingly or unknowingly facilitating crime.

**5.20** We will also build on work already in progress with trade bodies operating in the haulage sector to raise awareness of how their members can best secure their vehicles so that they do not become unwitting facilitators of modern slavery crime and to ensure that drivers and haulage companies know how to submit information about suspicious activity to the border authorities.



### **Use interventions to stop people being drawn into modern slavery crime**

**5.21** The Gangmasters Licensing Authority will continue to work to prevent exploitation by:

- Providing expert witness evidence and impact statements to law enforcement organisations undertaking investigations into labour exploitation; and
- Working with the regulated sectors to raise standards of worker treatment through the entire supply chain.

**5.22** We know that domestic servitude is often committed by individual perpetrators and we need to take this into account in developing our Prevent approach. Activity

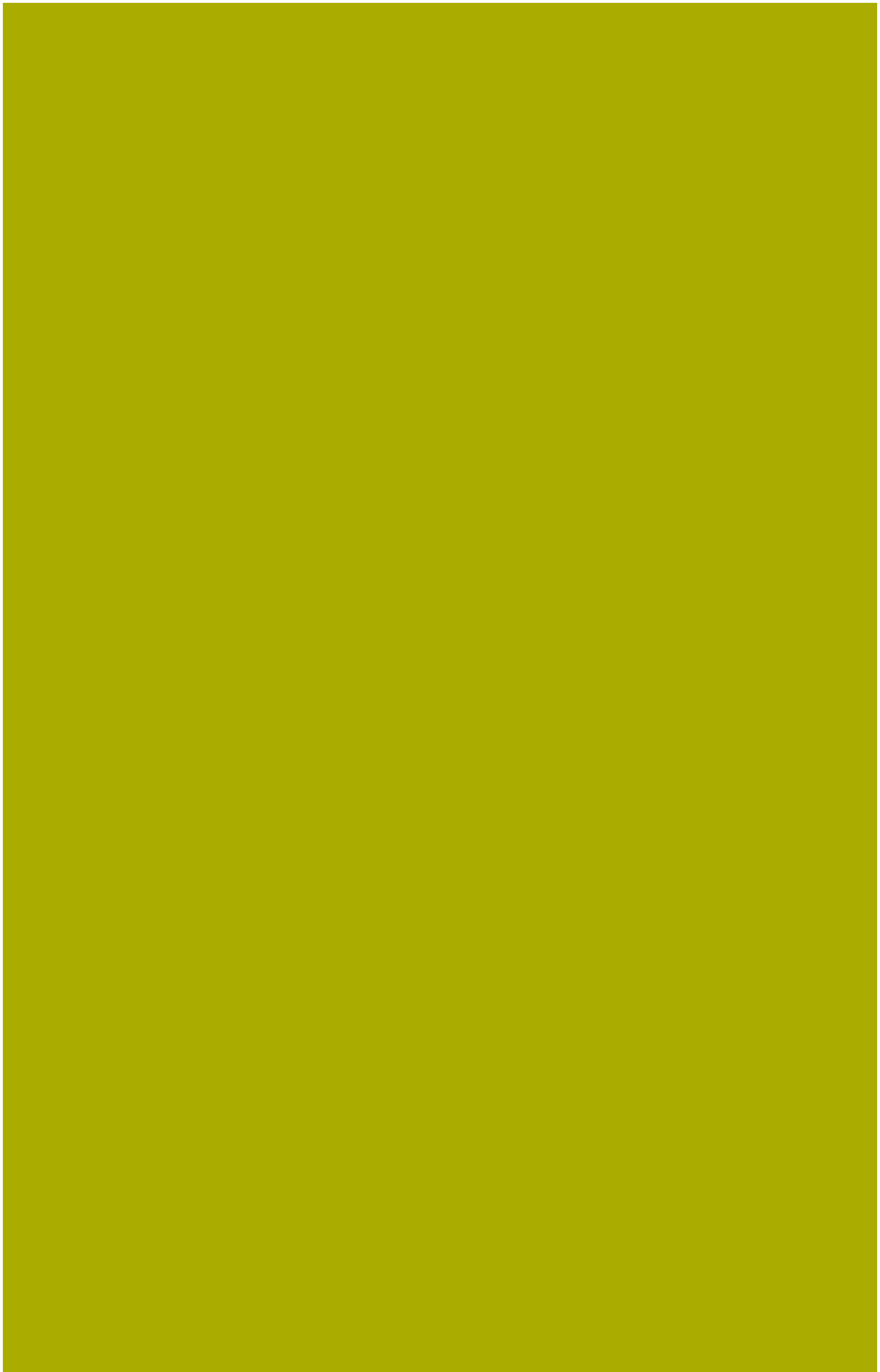
to help protect workers from exploitation is set out in the Protect chapter, but we will also support HMRC National Minimum Wage enforcement officers to carry out targeted enforcement exercises with overseas domestic worker employers.

### Utilise both the established offender management framework and new bespoke tools to deter reoffending

**5.23** Lifetime management is a system for continually assessing the threat from a person who has been engaged in serious and organised crime, both before and after any conviction. Effective lifetime management identifies interventions which are appropriate for specific people and which will have the greatest impact in cutting crime and reducing their reoffending.

**5.24** We will ensure that people who commit modern slavery crimes are included in the lifetime offender management framework arrangements being put in place as part of our Serious and Organised Crime Strategy. We will work with the National Offender Management Service (NOMS) and law enforcement to identify the offenders that pose the highest risk. We will make sure that these highest risk offenders are managed throughout their prison sentence, on probation and for as long as they pose a risk. This will include using all of the powers available to HM Prison Service and probation and will include, where appropriate, approaches such as Integrated Offender Management as well as Multi-Agency Public Protection Arrangements. Tailored licence conditions and ancillary orders such as Modern Slavery Prevention Orders and Serious Crime Prevention Orders will help ensure that these offenders are closely managed and deterred from reoffending.

**5.25** The new Slavery and Trafficking Prevention Orders will allow courts to restrict the activity of convicted traffickers and slave drivers to prevent further modern slavery offences from taking place. This could mean stopping an offender from working with children, acting as a gangmaster or travelling to specific countries. These orders will be available even where the conviction occurred in another country.



# PROTECT: Strengthening safeguards against modern slavery by protecting vulnerable people from exploitation and increasing awareness of and resilience against this crime

Success in PROTECT will mean that:

- Fewer people in the UK and overseas are deceived or forced into abuse.
- We reduce our vulnerability to modern slavery by raising awareness and increasing our resilience, across Government, the private sector and amongst the public.

Our objectives are to:

- i. Protect adults and children at risk of becoming victims of modern slavery;
- ii. Strengthen border security and improve our ability to detect victims and traffickers at the border;
- iii. Improve public awareness of the signs of modern slavery; and
- iv. Improve both public and private sector awareness and resilience.

**6.1** This chapter sets out the work of Government and others to protect people from becoming victims of modern slavery. The chapter also details the steps we are taking to ensure we have the right protections in place at the border to tackle modern slavery and our wider work to raise the profile of modern slavery and encourage the private sector, and the public, to play their part.

## Protect adults and children at risk of becoming victims of modern slavery

### Protecting children and adults at risk of exploitation in the UK

**6.2** We are undertaking urgent and vital work to strengthen the local authority

response to child abuse and organised child sexual exploitation, including the trafficking of children for sexual exploitation. In April 2013 the Government established the National Group on Sexual Violence against Children and Vulnerable People, through which agencies are now working together to better identify those at risk and create a more victim-focused culture within the police, health and children's services. The Group was set up in response to historical cases of child abuse and organised sexual exploitation cases in towns such as Oxford, Rochdale and Rotherham, which have highlighted unacceptable failings by authorities at a local level to ensure the protection of children. We are clear that this is a priority for the police and that we must protect children from sexual exploitation so that we never again have another case where local authorities and

police fail the children that they have a duty to safeguard.

**6.3** The Group has brought together experts and policy makers to agree what steps need to be taken to protect children from abuse, to better support victims and ensure effective investigation and prosecution of these terrible crimes. The Group is also considering a system of mandatory reporting of sexual abuse for professionals and a wider set of possible changes to corporate governance arrangements in institutions. The Home Secretary has announced her intention to hold a public consultation on whether to introduce a statutory requirement for mandatory reporting of child abuse.

**6.4** Preventing children from becoming victims in the first place is the most powerful way to tackle sexual violence. The Government's approach is to ensure adults and children, particularly the most vulnerable, understand the threat of sexual violence and what to do if they are worried or feel vulnerable. Importantly, those agencies responsible for keeping children safe must also understand what they need to do.

**6.5** The Government is taking a wide range of steps to improve the arrangements in place to protect children, in particular the most vulnerable, from abuse, including:

- The Home Secretary is chairing a series of Secretaries of State meetings to look at the lessons we can learn from failings in Rotherham, identified in Professor Alexis Jay's recent report<sup>21</sup>. These meetings will build on the work of the National Group and we will publish an action plan to cover both.
- Publishing a discussion guide for practitioners which uses 'This Is Abuse'

campaign material to facilitate discussions with teenagers on issues surrounding abuse. The guide covers topics such as abuse in relationships, sexual violence, consent, 'sexting', as well as advice for practitioners on child protection and safeguarding.

- Improving the teaching of sexual consent and healthy relationships in schools, through the work of the Personal, Social, Health and Economic (PSHE) Association.
- Local authorities must now record all incidences of children going missing from care as part of their annual data submission to the Department for Education on looked after children. To help ensure robust figures, this data return must have been agreed with the local police. The first full results from this improved national data collection will be published in September 2015.
- We recognise that children missing from care are particularly vulnerable and everything possible must be done to safeguard them. When the first set of improved data on children missing from care is available the Department for Education will review what further action may be needed. In addition, HMIC are undertaking an inspection of how police forces respond to missing children incidents.
- Broader social work reforms to improve the quality and expertise of social workers to strengthen the focus of professionals on the needs of the child.

**6.6** In addition, a new independent national inquiry led by a panel of experts will examine how state and non-state institutions have responded to child sexual exploitation and how they will also make a significant contribution in this area. The first report of the panel will be provided to Parliament before the end of this Parliament in May 2015.

<sup>21</sup> Professor Alexis Jay (2014) *Independent Inquiry into Child Sexual Exploitation in Rotherham* (1997–2013): [http://www.rotherham.gov.uk/downloads/file/1407/independent\\_inquiry\\_cse\\_in\\_rotherham](http://www.rotherham.gov.uk/downloads/file/1407/independent_inquiry_cse_in_rotherham)

**6.7** The Centre for Social Justice report, *It Happens Here*<sup>22</sup>, published in 2013, highlighted the vulnerability of homeless people to exploitation. We are committed to preventing and tackling homelessness and we have increased spending on schemes to prevent homelessness, making over £500 million available to help the most vulnerable in society. This includes £20 million to support the national roll out of the 'No Second Night Out' initiative to help rough sleepers and protect vital front line services. All local authorities have committed to adopt the 'No Second Night Out' approach. We have also supported the voluntary sector to deliver 'StreetLink', a national rough sleeping hotline, website and app, to connect rough sleepers to local services.

**6.8** Building on the work already done by the charity Homeless Link in this area, we will continue to raise awareness among homelessness shelter staff of the signs of modern slavery.

#### **Case Study: Raising awareness with homelessness charities**

The Department for Communities and Local Government support the 'Before You Go' campaign, working with The Passage, a UK homelessness charity.

Awareness raising messages have been targeted at potentially vulnerable communities in Romania, Lithuania and Bulgaria highlighting the importance of migrants securing a legitimate job before they come to the UK. The Passage has developed an online campaign and has run the awareness raising campaign through labour centres, schools and universities.

We will work with The Passage to ensure the campaign highlights the risks of modern slavery and makes clear where individuals can receive help and advice, as well as exploring extending the scope of the campaign to cover other countries from which we know large numbers of victims are trafficked to the UK.

<sup>22</sup> The Centre for Social Justice (2013) *It Happens Here: Equipping the United Kingdom to fight modern slavery*: [http://www.centreforsocialjustice.org.uk/UserStorage/pdf/Pdf%20reports/CSJ\\_Slavery\\_Full\\_Report\\_WEB\(5\).pdf](http://www.centreforsocialjustice.org.uk/UserStorage/pdf/Pdf%20reports/CSJ_Slavery_Full_Report_WEB(5).pdf)

## Overseas Protect work

**6.9** As we set out in the first chapter, we have a good understanding of the main countries of origin of foreign national victims trafficked to the UK. We are committed to working with agencies and NGOs in those countries, and also in additional countries that suffer disproportionately from a high incidence of modern slavery, to protect people from becoming victims in the first place. We know that there is often a strong relationship between internal trafficking within a country and international trafficking beyond borders and that work to address internal trafficking can therefore be effective in tackling international trafficking. We will:

- Use the new Modern Slavery Priority Country Plans to help drive Protect work overseas, working with key partners to encourage effective local action.
- Develop our understanding of communities and individuals most at risk of being trafficked or exploited and develop tailored and targeted programmes to raise awareness, deliver education messages, increase resilience, reduce vulnerability to exploitation and help provide economic alternatives.
- Increase our efforts to advise those that do choose to migrate about how to take the necessary precautions to protect themselves from exploitation.

**6.10** The Home Office will work in partnership with the FCO and the Department for International Development (DFID) on advocacy, protection and education work and we will collaborate with international partners to take global leadership on this issue.

**6.11** DFID programmes will tackle the factors that put people at risk of becoming victims and we will build on current anti-trafficking projects in India, Bangladesh and

West Africa. DFID will also continue to lead the 'Work in Freedom' programme, in partnership with the International Labour Organisation (ILO), to help girls and women in South Asia to avoid being trafficked to work in the Middle East in the domestic workers and garment manufacturing sectors. We estimate that over 100,000 girls and women will directly benefit from this project over five years.



## Preventing abuse of domestic workers in the UK

**6.12** We know that some individuals who come to the UK to undertake domestic work are exploited once in the UK. This includes both victims brought to the UK by their family or friends of the family and those whose travel to the UK is facilitated by an employer, third party or agent.

**6.13** We are committed to further strengthening the arrangements in relation to the issuing of visas to domestic workers to safeguard against their abuse. We will:

- Consider how far we can strengthen the existing requirement for a written contract prior to the issuing of the visa, including the possibility of introducing a new template with more explicit terms and conditions to ensure both sponsors and workers are aware of the expectations we have of them. For example, in addition to

hours of work and salary, also covering in greater detail sleeping arrangements, passport retention and holiday entitlements.

- Examine the potential to introduce compulsory video-conference interviews for all overseas applicants for domestic visas at the point of application.
- Pilot a programme to provide overseas domestic workers with supplementary information on their rights and where to get help and support, using a credit card sized information card provided by Border Force officials upon entry to the UK, to complement information that is already provided with the visa.

## Strengthen border security and improve our ability to detect victims and traffickers at the border

**6.14** Victims who are trafficked will often cross our borders and we need to use that opportunity to identify them and to intervene.

**6.15** The Joint Border Intelligence Units (JBIs) that we are establishing bring together Border Force officials, NCA officers and other relevant law enforcement partners at major ports and airports.

**6.16** Home Office Immigration Enforcement's Risk and Liaison Overseas Network (IE RALON) will utilise emerging intelligence to identify potential traffickers and their victims during the visa application process and at the border. We will deter and disrupt the use of false documentation and identities by working with airlines, strengthening checks on visa applicants, using appropriate biometric information and working with overseas law enforcement to share information.

**6.17** Border Force lead on targeting and disrupting traffickers and identifying potential victims at the border. Border Force will work closely with law enforcement agencies and civil society organisations in source countries to intercept traffickers, prevent victims from being trafficked to the UK in the first place and provide enhanced support and protection against re-trafficking.

**6.18** Border Force has established a programme of activity to strengthen its capability to tackle modern slavery, including:

- Ensuring all frontline officials receive training that enables them to spot the signs of trafficking and to understand the trafficking threats specific to their airports or ports.
- Rolling out specialist safeguarding and trafficking teams at major airports and ports, to support potential victims identified at the border and ensure they receive the immediate help and support they need.

**6.19** The travel industry has a key role to play in identifying and reporting suspicious travel activities and we will continue to work with the industry to raise the profile of modern slavery. Cabin crew, in the course of their duties, may have an opportunity to observe traffickers and their victims and to report unusual behaviour.

**6.20** We have worked with Virgin Atlantic and Thomas Cook to develop a human trafficking training package for cabin crew staff. We will work with the travel industry to encourage further rollout of this package.



### Case Study: Joint operation with Nigeria

An operation was developed between Border Force at London Heathrow and law enforcement partners in West Africa to create a more joined up approach to the threats faced by the UK from West African crime groups. A phase of the operation which focused specifically on human trafficking was conducted over five days in May and June 2014. The operation specifically considered Nigeria given it is a high risk source country for traffickers and victims of trafficking.

A wide range of partners from both countries were involved. In Nigeria this involved joint collaboration between the Nigerian National Agency for the Prohibition of Traffic in Persons (NAPTIP) and IE RALON staff stationed in Lagos and Abuja. In the UK, there was inter-agency liaison between Border Force, the Metropolitan Police Service, Home Office Immigration Enforcement, Hillingdon Social Services and the NCA.

A total of 12 flights into London Heathrow were targeted: seven transit flights and five direct flights. A total of 29 passengers were identified who displayed significant indicators of trafficking; 14 in Nigeria and 15 at London Heathrow.

The operation provided an opportunity for real time intelligence to be shared between Nigeria and Heathrow and resulted in a coordinated response. Working alongside partners whose work is solely focused on human trafficking provided the opportunity to develop a joined-up intelligence picture which was of mutual benefit in enhancing the threat picture and victim identification.

In the UK, improved inter-agency working relationships have been established as a result of this operation and these can be built upon for future operations. In Nigeria the success of the collaboration with NAPTIP has opened discussions to refresh the memorandum of understanding between the UK and Nigeria on human trafficking.

## Improve public awareness of the signs of modern slavery

**6.21** Public awareness and understanding of modern slavery in the UK is low. It is crucial that the public are aware that modern slavery exists across the country and have an understanding of the forms it takes if they are to recognise and report incidents. Increased awareness will drive increased reporting of incidences of modern slavery and, importantly, help reduce demand for items produced using slave labour – either here in the UK or abroad.

**6.22** The Home Office is increasing awareness of modern slavery through a broad-based communications strategy:

- A new modern slavery helpline and website<sup>23</sup> was launched in July, supported by a TV-led national communications campaign, to raise awareness and encourage reporting.
- A small-business awareness campaign will target sectors of the economy in which slavery has been reported, including hospitality, fisheries, food processing and agriculture. The audience includes owners, managers, employees,

<sup>23</sup> <https://modernslavery.co.uk>

**MODERN SLAVERY**

**MODERN SLAVERY IS CLOSER THAN YOU THINK**

**VICTIMS ARE EXPLOITED IN LABOUR, PROSTITUTION AND DOMESTIC WORK**

Victims of Modern Slavery are often trafficked and through fear or coercion, forced to work for little or no money. Sometimes, victims are sexually exploited or forced to commit crime. Slavery is closer than you think. It happens all over the world including the UK.

If you are a victim or know someone who might be visit [modernslavery.co.uk](http://modernslavery.co.uk) or to seek help or report concerns call the helpline.

**0800 0121 700**

Calls are free from landlines and most mobile networks.

**MODERN SLAVERY**

**WSPÓŁCZESNE NIEWOLNICTWO JĘST BLIŻEJ NIŻ CI SIĘ WYDAJE**

**OFIARY SĄ WYKORZYSTYWANE DO PRACY, PROSTYTUCJI I PROWADZENIA DOMÓW**

Ofiary współczesnego niewolnictwa są często przedmiotem handlu żywym towarem i zmuszane do pracy z powodu strachu lub pod przymusem, za małe wynagrodzenie lub nawet bez wypłaty. Czasami ofiary są wykorzystywane seksualnie lub zmuszane do popełniania przestępstw.

Niewolnictwo jest bliżej niż Ci się wydaje. Ma miejsce na całym świecie, włącznie z Wielką Brytanią.

Jeżeli jesteś jego ofiarą lub znasz kogoś, kto może nią być, wejdź na stronę [modernslavery.co.uk](http://modernslavery.co.uk). W celu uzyskania pomocy lub zgłoszenia przypadku niewolnictwa, zadzwoń pod numer.

**0800 0121 700**

Wszystkie połączenia są bezpłatne z telefonów stacjonarnych i z większości sieci komórkowych.

recruitment agencies, professionals and employee organisations and partners.

- We will develop localised activity by working with community and faith groups, NGOs and frontline service providers to raise awareness and encourage reporting of modern slavery. A pilot campaign in Yorkshire is planned for early 2015, focused on the issue of labour exploitation.

## Improve both public and private sector awareness and resilience

### Working with the private sector

**6.23** The Gangmasters Licensing Authority and HMRC, working in collaboration with trade associations and industry bodies, are committed to providing guidance and

support to stakeholders involved in the supply and use of labour in the UK. This includes highlighting the indicators of labour exploitation and providing businesses with the knowledge and skills to identify it.

**6.24** However, modern supply chains are often extremely long, complex and international. The goods that are bought and sold in the UK are produced all over the world, and even services provided in the UK can involve outsourced labour from across the globe. Therefore, if we want to ensure that the UK plays no part in perpetuating modern slavery we must ensure that consumers here are not unwittingly creating demand for modern slavery elsewhere.

**6.25** Companies sourcing their products overseas must be confident that those they do business with are not using forced or trafficked labour, so that consumers in the UK

can be equally confident that the goods and services they buy are free from slave labour. This will take a concerted, collaborative effort by Government and business, within the right regulatory framework. We will ensure that businesses investigate and report on modern slavery, and then help them to stamp it out.

**6.26** We have already put regulations in place in the Companies Act that require large, listed companies to report on human rights issues, and will be strengthening these reporting requirements further in 2016. Reporting on these issues allows shareholders and the public to scrutinise a company's efforts, and then drive further progress.

**6.27** However, we are committed to introducing measures that specifically address modern slavery. We will use the Modern Slavery Bill to introduce a legal duty on all businesses above a certain turnover threshold to disclose each year the steps they have taken to ensure that modern slavery does not take place in their business or supply chains anywhere in the world.

**6.28** The Department for Business, Innovation & Skills will continue to work with the British Retail Consortium to produce guidelines to help companies report consistently on their efforts to eliminate human rights abuses in their supply chains.

### **Public sector resilience**

**6.29** We will take action to improve the way in which public sector procurement takes account of the potential for exploitation in supply chains. We have already progressed measures at departmental and cross-Government levels. For example, the NHS standard terms and conditions for suppliers include conditions on labour standards and the Department for Health and NHS Supply Chain have developed a labour standards

assurance system for auditing suppliers in high risk sectors.

**6.30** In 2013 the Cabinet Office sought corporate social responsibility information from Government's strategic suppliers, who have over £100m worth of contracts with Government. A 2014 survey is about to be launched which will request further details of the steps taken and planned by these suppliers on ethical procurement and supply chain management. The Cabinet Office has worked with the Chartered Institute of Purchasing and Supply to develop an ethical awareness e-learning module which has been made available to all Government procurement officials.

**6.31** We will take steps to develop a pan-Government approach to procurement in the public sector by requiring those bidding for Government contracts to satisfy Government departments of their commitment in this area before contracts are awarded.

# PREPARE: Reducing the harm caused by modern slavery through improved victim identification and enhanced support

Success in PREPARE will mean that:

- More victims of modern slavery are identified.
- Victims are provided with appropriate and effective support and protection to help them recover.

Our objectives are to:

- i. Proactively identify victims of modern slavery;
- ii. Provide victims of modern slavery with appropriate and effective support;
- iii. Provide specialist support to child victims of modern slavery that recognises their unique vulnerabilities;
- iv. Support the reintegration of victims into society, both here in the UK and in their countries of origin, safeguard against re-trafficking and ensure that there are avenues for victims to receive reparation and compensation;
- v. Support victims and witnesses of modern slavery through court proceedings to ensure effective criminal justice outcomes;
- vi. Ensure effective safeguards to prevent victims from being convicted of offences they have been compelled to commit as a direct consequence of their enslavement; and
- vii. Ensure that we have the necessary capabilities to respond to major modern slavery incidents.

**7.1** We have made clear throughout this Strategy that our approach to tackling modern slavery is victim-focused. This means all those with a role in tackling modern slavery must always think first about the impact that their actions will have on victims and ensure that their welfare comes first. This chapter sets out the steps we are taking to ensure that victims are identified at the earliest opportunity and that they receive the support they need – whether they remain in the UK or are supported to return to their country

of origin. The chapter also reflects the key recommendations from the recent Review of the National Referral Mechanism (NRM)<sup>24</sup> – the national support system for victims of this crime.

<sup>24</sup> Home Office (2014) *Review of the National Referral Mechanism for victims of human trafficking*: <https://nrm.homeoffice.gov.uk/documents/2014/11/nrm-final-report.pdf>

## Proactively identify victims of modern slavery

**7.2** Modern slavery is unusual in that victims sometimes do not recognise that they are victims and this can make it very difficult to identify and help them. We are taking a range of approaches to ensure that those most likely to come into contact with victims are able to recognise the signs and know how to help a potential victim access support and assistance.



**7.3** One of the key functions of the new Independent Anti-Slavery Commissioner relates to the effective identification of victims. The Commissioner will work with the police and other relevant partners to help improve their ability to recognise potential victims, develop good practice in working collaboratively with local NGOs, launch effective investigations and support victims to give evidence.

**7.4** The Modern Slavery Bill includes a provision requiring the Home Secretary to issue statutory guidance to ensure that frontline professionals understand how to identify victims and help them to access the support they need. The Home Office will:

- Develop the guidance in close consultation with the wide range of organisations with expertise and experience in supporting victims, which will include a full formal consultation period, ensuring guidance is available which takes full account of the changes to the NRM and the legislative changes in the Modern Slavery Bill.
- Ensure that the guidance makes specific provision for the support of children, ensuring the support they receive is in their best interests.

**7.5** A number of the key organisations most likely to come into contact with victims – including police forces, the NCA, Border Force, UKVI, the GLA and health workers – all have training packages in place to raise awareness of modern slavery and highlight the signs and indicators to watch out for. For example, the National Centre for Applied Learning Technologies (NCALT) has developed an e-learning package specifically on human trafficking which has been used to train 47,000 police officers and police staff who work as first responders or investigators across the country.

**7.6** Building on this, the College of Policing has also commenced a programme to improve and expand training for police officers to cover all forms of modern slavery. The National Policing action plan to prevent child sexual exploitation has recommended that all police forces undertake local awareness raising initiatives on child sexual exploitation and we know that a large number have already taken place and that more are currently being planned.

**NO ROOM FOR SLAVERY**

Most hotel workers are employed legitimately. But in 2013, instances of modern slavery were reported in the hospitality sector.

Through threats, violence or coercion, victims of modern slavery are forced to work for little or no money, live in squalid accommodation and have their identity documents taken from them.

**If you employ staff, ensure you are doing so responsibly:**

- ✓ Check all staff have a written employment contract and that they have not had to pay any direct or indirect fees to obtain work.
- ✓ Make sure staff are legally able to work in the UK. Can the recruitment agency prove that checks have been made?
- ✓ Make sure your workers know their statutory rights, including sick pay and holiday pay.
- ✓ Check the addresses of those working for you. A number of people with the same address may indicate high shared occupancy, often a sign of exploitation.
- ✓ Assess quotations and fees from agencies charging suspiciously low rates against standard industry pricing.

To find out how to protect your workers visit [gov.uk/homeoffice/modern-slavery-information](http://gov.uk/homeoffice/modern-slavery-information)

To report any suspicions of slavery visit [modernslavery.co.uk](http://modernslavery.co.uk) or call 0800 0121 700

Home Office

HELP FREE THE UK FROM MODERN SLAVERY

**7.7** HMRC will ensure that all frontline visiting officers receive training to help identify the signs and indicators of modern slavery and ensure the appropriate response upon its identification.

**7.8** This work is supported by our much broader communications campaign to raise awareness among the general public, which both raises the profile of modern slavery and helps everyone understand what to look for. The new modern slavery helpline and accompanying website<sup>25</sup>, launched on 31 July 2014 in partnership with the NSPCC, provides a single dedicated telephone number where members of the public and potential victims can report their concerns or seek information and advice.

**MODERN SLAVERY**

**MODERN SLAVERY: A BRIEFING FOR THE HOSPITALITY INDUSTRY (HOTELS, RESTAURANTS)**

Modern Slavery can take many forms including the trafficking of people<sup>1</sup>, forced labour, servitude and slavery. Recent statistics show that 27% of potential victims are trafficked into labour exploitation.<sup>2</sup> Traffickers and unscrupulous recruitment agencies target a range of industries including those involved in hospitality.

**HOW YOUR INDUSTRY IS AFFECTED**

With the hospitality sector employing over 2.4 million people and contributing over £34 billion to the UK economy, traffickers and organised criminals are looking for opportunities to exploit the industry.<sup>3</sup>

In 2013, 1% (7 victims) of forced labour victims referred to services came from the restaurant or bar sector, and 41% of victims were trafficked for sexual exploitation, with 4% (44 people) sexually exploited in hotels. While the numbers coming to light are small, the hidden nature of this crime means actual numbers are likely to be much higher.<sup>4</sup>

The vast majority of employers will be recruiting people legitimately, but some firms could find themselves targeted by unscrupulous agencies or individuals.

**MAKE-UP OF MODERN SLAVERY VICTIMS IN THE HOSPITALITY INDUSTRY**

Anyone can become a victim of modern slavery. However, victims of this crime in the hospitality sector are often Eastern European men and women who are promised a job in the UK and then forced by traffickers to work for little or no money. Through threat, violence or coercion they may be forced to live in squalid accommodation and have their identity documents taken from them.

**Help free the UK from Modern Slavery**

All hotels and restaurants should make proper background checks on the agencies who supply them with labour, including where the agency is operating in a supervisory role. The Association of Labour Providers and the Recruitment and Employment Confederation are the two main recruitment industry associations, and work with the Gangmasters Licensing Authority to tackle slavery.

**POTENTIAL MODERN SLAVERY VICTIMS**

- ONE THIRD OF VICTIMS ARE MALE
- 27% TRAFFICKED INTO LABOUR EXPLOITATION
- 47% INCREASE SINCE 2012

**FORCED LABOUR VICTIMS**

- 80% OF VICTIMS ARE MALE
- 6% BORN

**HOW YOUR SECTOR IS AFFECTED**

- EMPLOYS OVER 2.4 MILLION PEOPLE
- CONTRIBUTES OVER £34 BILLION TO THE ECONOMY

**VICTIMS OFTEN COME FROM...**

SLOVAKIA, HUNGARY, ROMANIA, POLAND, LITHUANIA

**7.9** Our campaign has also provided a package to professionals on the indicators of modern slavery (see images above), and includes resources such as leaflets and posters.

## Provide victims of modern slavery with appropriate and effective support

**7.10** Once victims are identified we must ensure that they are provided with access to specialist support. These individuals have often endured horrific physical, psychological or sexual abuse at the hands of slave drivers and traffickers. The needs of survivors of modern slavery are amongst the most complex of any victims of crime, often requiring a multidisciplinary approach to address both the trauma of coming to terms

with their experience and longer-term support to help them move on and rebuild their lives. Immediate support in safe accommodation is important but we also need to consider what help we can provide victims so that they can move forward with their lives.

### Review of the National Referral Mechanism

**7.11** The National Referral Mechanism (NRM) provides potential victims of trafficking with specialist support, including safe and secure accommodation, to help them recover from their dreadful experiences and to rebuild their lives. The Government published its Review of NRM in November 2014 and recommended fundamental reform.

**7.12** The Review made a range of recommendations to improve the way in which the NRM operates, all of which have been accepted in principle by Government.

**7.13** The key recommendations regarding identification and decision making are:

- That the First Responder role, responsible for referring potential victims, be replaced by new Anti-Slavery Safeguarding Leads, supported by increased training and feedback.
- That the Government seeks to streamline and improve the referral process by removing the “reasonable grounds” decision – allowing direct referral to specialist support for potential victims.
- That new multi-disciplinary panels, headed by an independent chair, are established with a view to ceasing the sole decision-making roles of UKVI and the NCA.
- That a single case-working unit within the Home Office should replace the current case-working units in the National Crime Agency and UK Visas and Immigration.

**7.14** These changes are intended to ensure that victims receive the support and help that they are entitled to and that they need. As the Review notes, these changes require very careful and staged implementation, testing the new approaches wherever possible. The Home Office will:

- Establish two pilots to test the recommendations as part of a planned implementation of these changes.
- Work with stakeholders to develop an implementation plan for the Review’s recommendations to ensure that they are carefully and sensibly implemented.

**7.15** The Home Office and the Ministry of Justice jointly fund a national support service for adult victims of human trafficking in England and Wales. This provides extremely vulnerable victims of human trafficking with care and support – including safe, secure accommodation and access to additional support and help. This contract is currently delivered by The Salvation Army, and expires in March 2015. We are currently tendering for a new contract through which we will continue to provide potential adult victims with the help and support they need. The support available through the new national contract will sit alongside other specialist support offered by NGOs and others.

**7.16** Potential adult victims of human trafficking are provided with tailored care and support following a detailed needs based assessment. This support can consist of: appropriate and secure accommodation; financial support; access to emergency medical treatment and assistance with sexual health issues; translation and interpretation services where appropriate; access to counselling, including trauma counselling and psychological support; access to legal advice and assistance; and transition support to either return home, or where they have leave to remain, to help settle in the UK.

**7.17** In line with the recommendation of the NRM Review we will make clear that support and care will be offered to all adult victims of modern slavery.

**7.18** The NRM Review also recommended that the Government should consider whether this support could be enhanced, including by:

- Consistently providing immediate access to safe accommodation for those that need it.
- Providing support based on an assessment of the individual needs of the victim and that consideration be given to entry and exit timescales.
- Ensuring that planning for a safe transition from safe accommodation to independent living commences as early as possible and that this transition is as effective as possible.
- Exploring the most effective ways in which the service can be extended to support victims once they leave the service.
- Confirming that standards of support are provided at the agreed level through an audit or inspection of provision within the victim care contract.

**7.19** We have welcomed all of these recommendations, which we believe provide the basis for long term transformation for the way in which we identify and support victims of modern slavery. As the Review makes clear, these changes require the support and commitment of a wide range of agencies within Government and beyond and we are committed to working with these partners to develop effective ways in which to implement these changes.

## Provide specialist support to child victims of modern slavery that recognises their unique vulnerabilities

**7.20** Children are especially vulnerable and have particular support needs. Physically, they are not able to protect themselves. They are usually unaware of any laws that may exist to protect them and they are unable to negotiate fair treatment for themselves. In addition, when rescued from exploitation children are likely to have even greater difficulty articulating the nature of their experiences compared with adult victims. As a consequence of having been abused by adults they are also likely to be suspicious and wary of support which is not offered in the right way.

**7.21** The Department for Education has issued strengthened statutory guidance for local authorities on care planning for unaccompanied asylum seeking and trafficked children<sup>26</sup>, which sets out the steps local authorities should take to plan for the provision of support for these children. This will strengthen support arrangements for this vulnerable group, ensuring that safeguarding is at the forefront. The guidance makes clear that placement decisions should take particular account of protecting the child from any continued risk from traffickers, and from a heightened risk of going missing.

**7.22** In January and April 2014 strengthened regulations came into effect requiring children's homes to assess the safety of the areas where they are located and to develop effective policies on prevention and response to children going missing. These new requirements set clear expectations for homes to consult and collaborate with local

<sup>26</sup> Department for Education (2014) *Care of unaccompanied and trafficked children*: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/330787/Care\\_of\\_unaccompanied\\_and\\_trafficked\\_children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/330787/Care_of_unaccompanied_and_trafficked_children.pdf)



police and safeguarding services about their policies for preventing children in their care from going missing and about the procedures to be followed if children are missing from their care placements.

**7.23** In January the Department for Education also published strengthened statutory guidance on *Children who run away or go missing from home or care*<sup>27</sup>. This sets out the steps that local authorities and their partners should take to prevent children going missing and to protect them when they do. As part of this guidance councils now have a duty to interview children who have been missing within 72 hours of their return to reduce their likelihood of going missing again. Since April 2014 all local authorities have been obliged to record all instances of children going missing from care and should, with partner agencies, analyse this data regularly to help protect the young people in their care.

**7.24** We are currently consulting on new quality standards for children's homes that will require all homes to provide high quality care and support to children. The revised regulations will include a 'protection of children' standard, which makes clear our expectation that all homes act to keep their children and young people safe from harm.

**7.25** Amendments have been made to the Care Planning, Placement and Case Review Regulations 2010 so that where there are child protection concerns (including concerns about a risk of sexual exploitation, child trafficking or other forms of abuse, or where the child has gone missing or run away from previous placements) the Placement Plan that must be agreed between the local authority and the placement provider must include the day to day arrangements that the provider (i.e. the registered manager of a children's home or the

foster carer) will put in place to keep the child safe. This is intended to ensure that a safety plan is integral and inseparable from the requirements of the placement to care for the child.

**7.26** The Department for Education is also providing funding to Barnardo's for a project aimed at embedding more effective practice in safeguarding children, including those in foster care, from sexual exploitation.

**7.27** To help schools safeguard their pupils, in April we issued updated statutory safeguarding guidance, *Keeping children safe in education*<sup>28</sup>. This sets out the role of schools and their staff and includes links to specific guidance on trafficked children and children who go missing from care.

**7.28** We are also trialling specialist, independent advocates to support child victims of trafficking. The trials began on 8 September 2014 and will run for a period of 12 months in 23 local authorities across England. An independent evaluation of the trials will assess the impact of providing child trafficking victims with a single, consistent advocate with the capacity and expertise to promote their welfare and guide them through the social care, immigration and criminal justice systems. It is envisaged that the independent advocates will help to reduce the risk of these vulnerable children going missing and being re-trafficked and will ensure that this extremely vulnerable group of children receive the support and protection they need and deserve.

**7.29** The Modern Slavery Bill will place a duty on the Secretary of State to make arrangements that she considers reasonable to enable child trafficking advocates to be available for children who there is reason to believe may be victims of human trafficking. The duty will be subject to commencement

<sup>27</sup> Department for Education (2014) *Statutory guidance on children who run away or go missing from home or care*: <https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>

<sup>28</sup> Department for Education (2014) *Keeping children safe in education*: <https://www.gov.uk/government/publications/keeping-children-safe-in-education>

procedures set out in the Bill that give Parliament the final say on whether the Secretary of State commences the duty. This will allow for the outcome of the independent evaluation of the child trafficking advocates trial to ensure we introduce the very best support for these vulnerable children.

### Presumption of age

**7.30** We are also introducing a presumption of age clause in the Modern Slavery Bill to ensure that child victims receive appropriate support and assistance as soon as possible. This puts beyond doubt that where there is uncertainty around the age of a potential victim who is believed to be a child the person should be presumed to be a child and as a consequence action is taken to secure their immediate protection. We are committed to improving the age assessment process.

**7.31** The Home Office will work with a wide range of statutory and non-statutory organisations, including the Association of Directors of Children's Services, the Department of Health, the Department of Education, the Office of the Children Commissioner (England) and clinical bodies to produce guidance on best practice and a protocol which sets out how agencies should work together to expedite age assessments to ensure that people whose age is in doubt can be provided with appropriate services.

### Support the reintegration of victims into society, both in the UK and in their countries of origin, safeguard against re-trafficking and ensure that there are avenues for victims to receive reparation and compensation

**7.32** Reintegration for a survivor of modern slavery can be a long and complex

process. Some survivors may never recover. However, we know that providing victims with appropriate support and guidance is the best way of ensuring that they can rebuild their lives in a way which increases their resilience and minimises their risk of being re-trafficked. It also helps ensure they feel able to support the police and others in bringing the perpetrators to justice.

**7.33** A large proportion of victims encountered in the UK are foreign nationals who have either travelled to the UK looking for a better life or have been brought to the UK by their trafficker. Some victims want to return home and we are committed to improving the help they receive to do so. We will want some victims to remain in the UK to support the police in their investigations and we are committed to ensuring that they get the support and assistance they need whilst they remain in the UK, and then receive the help they need to go home. Other victims will want to remain in the UK – but unless they have both the right to remain in the UK and are able to support themselves whilst they do so, we will be encouraging these victims to take advantage of a package of help and support to return home.

### Improving support for victims returning home

**7.34** The Home Office, through Refugee Action's Choices Service, offers a number of return packages for victims from countries outside the European Economic Area (EEA), which provides practical support and advice for trafficking victims who want to return home. This provides help in getting travel documents, arranging flights and, importantly, help in preparing a 'reintegration plan' – preparing for departure in the UK and deciding what the individual will do on return. The package may include support for reintegration assistance and those who return may also be eligible for

further support through the Coordinated Approach for the Reintegration of Victims of Trafficking (CARE) project, administered by the FCO in conjunction with the International Organization for Migration. This initiative is co-funded by the EU and four other Member States and provides tailored support for those victims of trafficking who wish to return to non-EU Member States.

**7.35** These packages have not been previously available to victims from EEA countries. In order to ensure that this support is available to all victims, regardless of their country of origin, the Home Office will extend the Choices Programme to victims of modern slavery from EEA countries.

**7.36** We know that the support victims receive once they return home is crucial to helping them reintegrate safely and protect them against the risk of being re-trafficked. The NRM Review highlighted the importance of support providers preparing survivors for return to their home country, liaising with the providers of supported voluntary returns.

**7.37** Victims, who are often still very wary of the authorities, tend to be more comfortable when supported by NGOs. To help reassure victims that they will be supported on their return, we will work with the Roman Catholic Church and other partners to build NGO capacity in key priority countries, within the EEA and beyond, to support reintegration and protect against possible re-trafficking.

### Helping victims to support police investigations

**7.38** We are committed to bringing more perpetrators to justice and a key element of our strategy is to improve the support available to victims so that they feel safe and secure in helping the police investigate these crimes. We know that bringing perpetrators to justice can make a crucial contribution to helping victims put their experiences behind

them and move on. But victims need to be confident that they will be listened to and that they will be safe from any reprisal. Police investigations and legal proceedings can be lengthy and it is important that victims can be confident that they will be financially secure and provided with the opportunities to go into education or employment.

**7.39** The police already have the power to apply for Discretionary Leave to remain in the UK for any victim of trafficking, irrespective of whether they come from a EEA or a non-EEA country, where that individual is supporting the police in their enquiries. Crucially, discretionary leave status provides a victim with automatic entitlement to financial support, most notably Housing Benefit and Job Seekers Allowance. As a result, they can be reassured that the support net is there for them whilst they recover in the UK. However, we know that this is not widely used – in 2013 only 52 cases were granted this form of leave – and we are committed to changing this. We will:

- Encourage close working with the police under the new victim support contract.
- Consider whether the new multi-agency decision-making panels recommended by the NRM Review should consider whether there is sufficient evidence to suggest that investigation by the police might be appropriate and that the victim would assist, or whether there is an ongoing investigation which the victim is assisting with. In those circumstances, the panel would consult with the police to ascertain whether an application for discretionary leave in support of any investigation would be appropriate.
- Promote increased awareness of the provision within police forces, including by ensuring it is included in the new statutory guidance on supporting victims.

## Support for victims who want to remain in the UK

**7.40** We know that many victims will want to remain in the UK. Many non-EEA national victims will be able to establish a right to remain in the UK under the Immigration Rules, including as refugees, and, as a result, will be able to access the financial and practical support available to help them make the transition to independent living. We will work with our support organisations to make sure that those who do need to remain in the UK can transition more effectively from supported accommodation to living independently through accessing wider financial, social and psychological support.

**7.41** However, there will be victims from EEA countries who will want to remain in the UK, but will not have the financial means to do so. Although there may be barriers, with the right help and support many victims can safely return home, and we believe that will often be the best outcome for these victims. By ensuring the Choices scheme is available to victims from EEA countries and by helping improve the support available to victims once they return home, we believe that we are putting in place arrangements which are both supportive and fair.

**7.42** The NRM Review highlighted the importance of support providers facilitating access to mainstream support and assisting with applications for education or work. We will work with support providers to ensure they concentrate on accessing local services and on building strong relationships in their local area with those who can provide services for victims. We will also examine how we monitor and track service users in the period following their support so that we can assess how effective the support they have received has been in helping them move on in life.

## Legal assistance

**7.43** Currently, victims of human trafficking are able to apply for civil legal aid for advice and representation in relation to immigration matters and damages claims in relation to their trafficking exploitation under paragraph 32 of Part 1 of Schedule 1 to the Legal Aid, Sentencing and Punishment of Offenders Act 2012. They are also able to apply for civil legal aid in relation to employment law claims arising from their exploitation. We have committed to extending this legal aid provision for victims of human trafficking to all modern slavery victims.

## Reparation and compensation

**7.44** We know that compensation for victims is very important in the process of recovery and also in preventing possible re-trafficking. It can improve the chances of a victim's psychological recovery and eventual reintegration into society and can also offer economic empowerment and protection from being re-trafficked.

**7.45** We strongly believe that the criminal justice system must give greater priority to providing victims of modern slavery with reparation for the abuse and suffering that they have been subjected to. It is unacceptable that victims of modern slavery almost never receive compensation from assets seized from perpetrators. We will use the Modern Slavery Bill to introduce a new bespoke reparation order which will enable the courts to ensure that more money from convicted traffickers and slave drivers goes to victims.

## Support victims and witnesses of modern slavery through court proceedings to ensure effective criminal justice outcomes

**7.46** We have set out the steps we are taking to encourage and help victims to support police investigations and to bring the perpetrators to justice. We know that our court system can be daunting and unfriendly, which can discourage victims from coming forward.

**7.47** To address this we have provided in the Modern Slavery Bill that existing specific provisions for human trafficking victims, including automatic eligibility for special measures, are extended to all modern slavery victims. Special measures apply to witnesses who are giving evidence in court and include screening the witness from the accused, giving evidence by live link, giving evidence in private, removal of wigs and gowns, video recorded evidence and video recorded cross-examination or re-examination. It is vital that we provide this support to victims and doing so will help more victims give evidence in court, which is crucial in our fight against the perpetrators.



**7.48** There is also a significant amount of work already underway, led by the National Group on Sexual Violence against Children and Vulnerable People, to improve the way in which the criminal justice system supports vulnerable victims and witnesses. Victims of modern slavery will benefit from these improvements. For example, we are currently piloting the use of pre-trial video cross-examination of vulnerable witnesses to try to develop an approach which is much less traumatic for witnesses. The Crown Prosecution Service has also published new guidance for prosecutors of child sexual abuse cases, making clear that the focus must be on the credibility of the allegations, not the credibility of the victim.

## Ensure effective safeguards to prevent victims from being convicted of offences they have been compelled to commit as a direct consequence of their enslavement

**7.49** We know that some victims are forced to commit crimes as part of their exploitative situation. They should not find themselves treated as criminals where they had no realistic alternative. There are existing safeguards in place to ensure that victims of modern slavery are not re-victimised by the criminal justice system itself by being prosecuted for offences they have been forced to commit by slave drivers and traffickers. For example, the Director of Public Prosecutions has recently issued revised guidance to the Crown Prosecution Service on non-prosecution of victims.

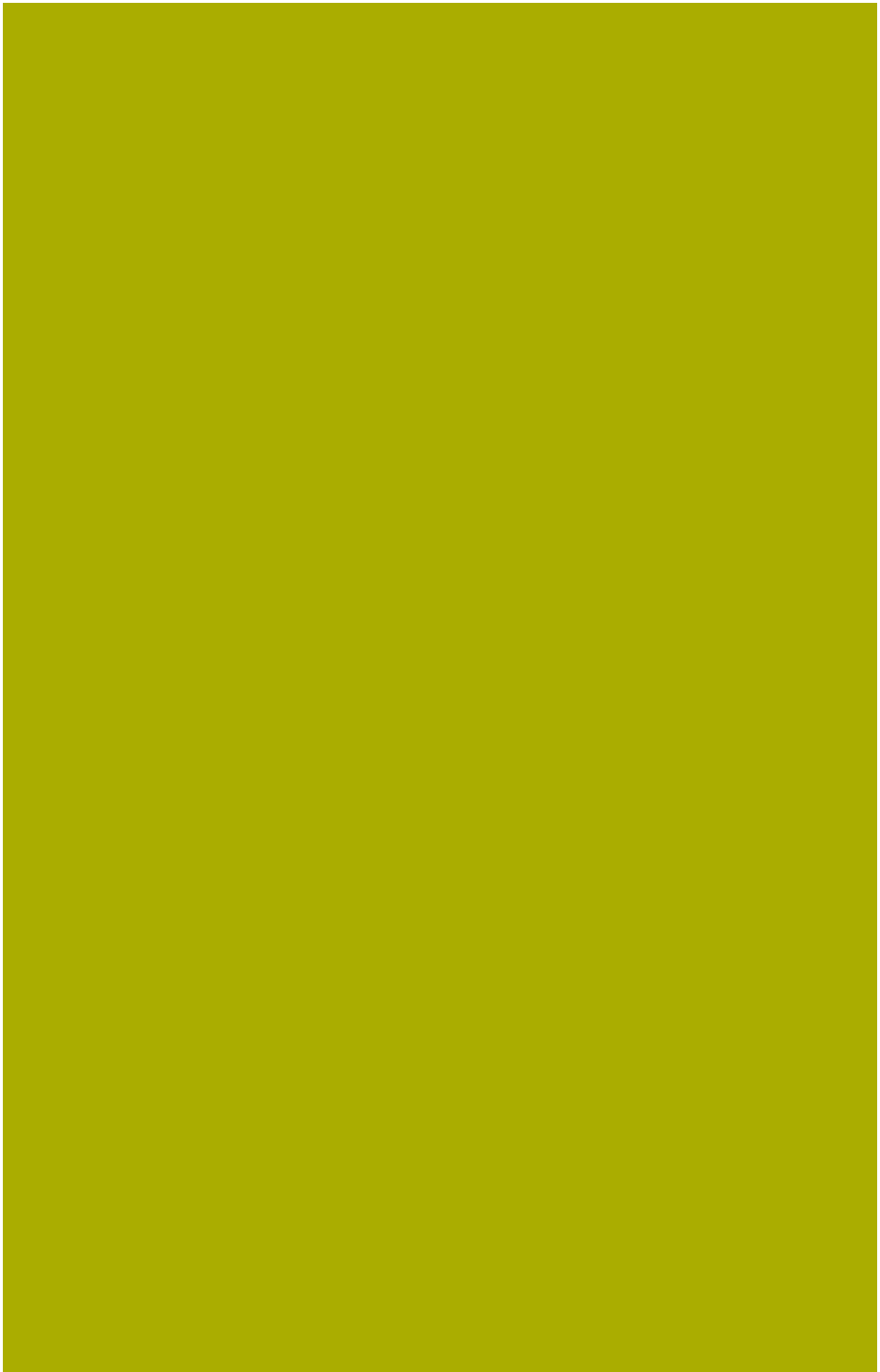
**7.50** However, given the importance of protecting victims and giving them the confidence to come forward, we are taking the opportunity of the Modern Slavery Bill

to go further. We will introduce a statutory defence for victims of modern slavery. The defence will mean that victims of modern slavery who have been compelled to commit an offence as a direct consequence of their trafficking or slavery situation can be confident that they will not be treated as a criminal by the criminal justice system.

**7.51** The defence will include clear safeguards to ensure we do not create a legal loophole for serious criminals to escape justice. It will be a condition of the new defence that the person had no realistic alternative but to act in the way they did and the defence will not apply to certain serious offences, mainly serious sexual or violent offences. Where the defence does not apply because the offence is too serious, the Crown Prosecution Service will still be able to decide not to prosecute if that would be in the public interest.

### Ensure that we have the necessary capabilities to respond to major modern slavery incidents

**7.52** Using the established national Serious and Organised Crime Exercise Programme, we will exercise and test the ability of the police, law enforcement agencies and other partners to respond jointly to instances of modern slavery. In particular, we will use these exercises to improve the response and coordination between partners. Private and voluntary sector organisations will be key contributors to these exercises.



## Annex: Implementation and accountability

- i. This Strategy has set out our comprehensive programme of action to tackle modern slavery. We believe that this activity will make a significant impact on the extent of modern slavery, both here and abroad. It will be important to closely monitor delivery of the commitments in this Strategy and, crucially, to assess whether or not they make the difference that we expect.
- ii. The Home Office will establish specific arrangements to drive delivery of the Strategy, drawing in contributions and expertise from other Government departments, law enforcement and other agencies, and civil society organisations. The Home Office's Modern Slavery Stakeholder Forum is currently supported by a number of thematic sub-groups which are responsible for driving activity in priority areas. Working with the Stakeholder Forum and other Government departments, the Home Office will establish new working groups to drive delivery of the Strategy and support the development of policy and practice in key areas.
- iii. The Inter-Departmental Ministerial Group on Modern Slavery (IDMG) will be responsible for overseeing the Government contribution to the Strategy. As noted in Our Strategic Response, the Foreign Secretary will make an annual report to the IDMG on the effectiveness of activity to tackle modern slavery in priority countries. The IDMG will also be responsible for publishing an annual review of this Strategy.
- iv. It is important to note that these arrangements will sit alongside the work of the Independent Anti-Slavery Commissioner. In addition to publishing their plan of activity, the Commissioner is also required by statute to publish an annual report of their work.
- v. We believe that these arrangements, taken together, will ensure comprehensive oversight of the Strategy, fully involving all partners – both inside and outside of Government – and ensure that the commitment to tackling modern slavery continues and endures.



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