

INDEPENDENT ANTI-SLAVERY
COMMISSIONER
ANNUAL REPORT 2019-2020

Independent Anti-Slavery Commissioner Annual Report 2019-2020

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

September 2020



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Foreword

Dame Sara Thornton – Independent Anti-Slavery Commissioner

The Modern Slavery Act (2015) sets out my role to encourage good practice across the UK and in my strategic plan which was laid before parliament in October 2019 I set out how I planned to do that. This report is structured around the four priorities in the strategic plan and details my activities, and those of my small team, over eleven months from my appointment in May 2019.

Reading the Hansard account of the passage of the Modern Slavery Act I am struck by the importance that parliamentarians attached to the independence of my role – indeed ‘independent’ was added to my title by amendment to the original bill. I have endeavoured to act objectively, impartially and base my assessment on evidence and data in all that I do. More victims of modern slavery are being identified and protected but there are still too many weaknesses in the systems. In particular, we need to do more to ensure that those who have suffered from the most egregious criminal acts are supported to become survivors leading lives of sustainable independence. Police forces and prosecutors are doing more to bring traffickers to justice but the use of offences under the Modern Slavery Act remains too low and organised crime groups continue to see the rewards as high and risks as low.

In addition to a focus on supporting victims and encouraging prosecutions, the human rights and the criminal justice approaches, I have also put emphasis on the structural issues which allow slavery and trafficking to flourish. Raising public awareness, ensuring that businesses are putting stakeholders as well as shareholders at the centre of their thinking and supporting international development to build resilience in priority countries all contribute to preventing modern slavery. Ending modern slavery requires concerted action from the widest coalition of motivated people and organisations at the local, regional, national and international level.

We have written this report as we have worked from home as a result of the Covid-19 pandemic. The pandemic has exacerbated the vulnerability of victims and survivors, created new vulnerabilities and disrupted organisations who support victims and those which bring offenders to justice. Many are concerned that work across the world to end slavery will be knocked back years as governments prioritise building economic activity above concerns for human rights. I hope that their worries are ill-founded because we know that the best businesses value people and planet as well as profit. The pandemic is a once-in-a-lifetime opportunity to reset and to build back better. I hope that we take it.

Glossary

APPG	All-Party Parliamentary Group
CCE	Child criminal exploitation
CCLA	Churches, Charities and Local Authorities Investment Management Limited
CG	Conclusive grounds
CPS	Crown Prosecution Service
CSE	Child sexual exploitation
DFID	Department for International Development
DWP	Department for Work and Pensions
EEA	European Economic Area
EU	European Union
EUSS	European Union Settlement Scheme
GLAA	Gangmasters and Labour Abuse Authority
HMICFRS	Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services
HMRC	Her Majesty's Revenue & Customs
ICAI	Independent Commission for Aid Impact
ICTG	Independent Child Trafficking Guardian
LGA	Local Government Association
MSHT	Modern slavery and human trafficking
MSOIC	Modern Slavery and Organised Immigration Crime Unit
NCA	National Crime Agency
NGO	Non-governmental organisation
NRM	National Referral Mechanism
NRPF	No recourse to public funds
OCG	Organised crime group
PaCCS	Partnership for Conflict, Crime and Security Research
PEC	Policy and Evidence Centre for Modern Slavery and Human Rights
PHE	Public Health England
RG	Reasonable grounds
RPC	Regional Practice Co-ordinator
SCA	Single Competent Authority
SIA	Security Industry Authority
STPO	Slavery and Trafficking Prevention Order
STRO	Slavery and Trafficking Risk Order
VCC	Victim Care Contract



Figure 1: The Commissioner’s strategic priorities 2019-2021

The Commissioner's Advisory Panel

Message from the chair: The Rt Rev Dr Alastair Redfern

"I was delighted to continue as Chair of the Commissioner's Advisory Panel, which has met regularly since Dame Sara's appointment. I commend the publication of this Annual Report, which outlines the impressive range and depth of work undertaken following the publication of the ambitious Strategic Plan 2019-2021 last year and is a testament to her outstanding leadership.

I look forward to continuing to provide guidance and challenge to the Commissioner as she seeks to champion good practice in the long-term support of victims and survivors, and to raise awareness of the practical measures we can all take – whether as members of the public, government, charities, faith groups or businesses – to tackle and prevent this terrible crime."

Purpose of the panel

The purpose of the Advisory Panel is to provide me with guidance, challenge and support. The panel meets quarterly and is comprised of a diverse body of experts from the modern slavery sector and beyond.

The Advisory Panel was reconstituted following my appointment as Commissioner in May 2019. I welcomed new and returning members and would like to thank Sir Tom Phillips KCMG and Cindy Berman for their support during their time on the panel.

Panel members have agreed [Terms of Reference](#) which are available on my website. The Advisory Panel has met four times in 2019-2020 and all [meeting minutes](#) are available on the website.

Panel members

The Rt Revd Dr Alastair Redfern
Chair, The Clewer Initiative

Lara Bundock
CEO and Founder, The Snowdrop Project

The Rt Hon. The Baroness Butler-Sloss GBE
Co-Chair, All-Party Parliamentary Group (APPG) on Human Trafficking and Modern Slavery

Michael Clarke
CEO, The Passage

Rt Hon. Fiona Mactaggart

Chair, Agenda and Fawcett Society; former Co-Chair, APPG on Human Trafficking and Modern Slavery

Julia Mulligan

Police, Fire and Crime Commissioner, North Yorkshire

Dr Paul Rigby

Lecturer in Social Work, University of Stirling

Gillian Rivers

Partner, Penningtons Manches Cooper

Sir Bernard Silverman FRS

Professor of Modern Slavery Statistics, Rights Lab, University of Nottingham

Yasmin Waljee OBE

International Pro Bono Director, Hogan Lovells

Mel Wiggins MBE

Former Project Coordinator, Freedom Acts

The Baroness Young of Hornsey OBE

Co-Chair, APPG on Sport, Modern Slavery and Human Rights

Priority 1: Improving victim care and support

1.1.1 Over the past year, I have been encouraged by the work that is going on at both the national and local level to provide care and support to victims and survivors of modern slavery. I have been impressed by the dedication and commitment of professionals in this sector and have been struck by the courage of the survivors that I have met.

1.1.2 There have been tremendous efforts to raise awareness and improve the identification of victims. There have been important developments in improving support for victims, but there have also been areas where progress has been slow. I have been, and will continue to be, committed to ensuring that victim support is effective not only in the short-term; but that in the longer-term we are able to empower survivors to live a life of sustainable independence.

1.1.3 Covid-19 has delivered unprecedented challenges in supporting victims and in many ways has increased vulnerability to exploitation. It is essential, now more than ever, that we continue with our efforts to improve the quality of victim care and support in the UK.

Encouraging better identification and referrals

1.2.1 In 2019/2020, 11,342 referrals¹ were made into the National Referral Mechanism (NRM), a 51% increase on figures from 2018/2019. Whilst it is positive that more vulnerable victims are being identified, this is placing increasing demand on both the NRM and on local authorities. With a growing number of British nationals being referred into the NRM, it is clear that we are seeing a changing cohort of victims, including children and adults with complex support needs.

1.2.2 In these cases, victims are increasingly signposted towards local authorities for support and I am concerned about the lack of clarity on where the duty to safeguarding these individuals lies between the Victim Care Contract (VCC) and statutory agencies. I am encouraged by the ongoing efforts to equip frontline staff in local authorities with the skills and knowledge to identify victims. However, in order to provide effective support, local authorities need to have clearly defined responsibilities and processes in place to respond and they need to be appropriately funded to do so.

1.2.3 In October 2019 I convened a roundtable attended by the Local Government Association (LGA), London Councils and local authority representatives from across the UK. We discussed examples of good practice, including Sandwell's Slavery and Trafficking Operational Partnership and training for local authority staff in London delivered by Stop the Traffik. We also identified challenges, including difficulties in applying the Care Act (2014) to the modern slavery context and a lack of cross government coordination in addressing policy areas such as housing, welfare and immigration. I have followed up these issues with colleagues in government to explore these concerns and identify opportunities for more joined-up ways of working.

1.2.4 Over the past year, I have met with the LGA on a quarterly basis to maintain oversight of their current priorities and the challenges that local authorities are facing. I have been encouraged to see the active role that the LGA are taking in upskilling local authority colleagues including their recent publication on responding to exploitation in hand car washes² and there

¹ See Appendix B.

² Local Government Association (LGA) (2020), '[Tackling Labour Abuse and Modern Slavery in the Hand Car Wash Sector](#)'.

has also been guidance published for councils in Northern Ireland³ as well as for local authorities⁴ in Scotland. The Scottish Government has also published guidance for healthcare workers.⁵ I was looking forward to speaking at the LGA conference later this year and while this has been cancelled due to Covid-19, I hope to have a further opportunity to speak to senior leaders about these issues. I have also been impressed by efforts to coordinate a pan-London group for local authorities, with London Modern Slavery Leads meetings now attended by all 32 London boroughs. Where possible, my office attends these meetings to remain sighted on the progress being made by local authorities.

1.2.5 In October 2019 I also hosted a roundtable with the health sector. We discussed efforts to increase knowledge among health professionals including resources developed by the Royal College of Nursing,⁶ but recognised that the level of knowledge still varies significantly across the sector. The group highlighted the importance of embedding this awareness within the earliest stages of training and I have since written to each of the Royal Colleges in the UK, urging them to include modern slavery and human trafficking within their curriculum for trainee doctors.⁷ I have received some positive responses and understand that my approach was timely as many Colleges are in the process of reviewing their curriculum. We heard about the PROTECT programme⁸ (Provider Responses, Treatment and Care for Trafficked People, a programme on improving identification, referral and care of trafficked people within the National Health Service) and the efforts to revisit this work and determine how the recommendations made in 2015 can be prioritised. We also heard about plans for PROTECT II which will evaluate the effectiveness of advocacy interventions in improving mental health and well-being within the NRM. Finally, the group also suggested exploring in more detail a public health approach to modern slavery which is an area of significant interest and is discussed further on page 13 of this report.

1.2.6 During my visits to Scotland and Northern Ireland, I have spoken with officials to understand why fewer victims are being referred there than in England and Wales.⁹ I am told that child criminal exploitation (CCE) is not yet a significant issue in these regions and this is likely to be a contributing factor. I have been encouraged to see some recent increases in referrals and particularly the efforts in Scotland to identify and safeguard Vietnamese victims of modern slavery. I am aware that the Scottish Government has recently consulted on Section 38 of the Human Trafficking and Exploitation (Scotland) Act 2015 - Duty to Notify and provide information about victims.¹⁰ I understand that responses were largely supportive of the Scottish Government's proposals to introduce a duty for specified public authorities to notify Police Scotland when identifying a victim, and I look forward to seeing the impact of this change in providing a more accurate picture of the scale of modern slavery in Scotland.

1.2.7 Over recent months my office has also begun to work with the Ministry of Defence and Her Majesty's Prison and Probation Service to improve the identification of victims of modern slavery and I look forward to developing this further.

³ Northern Ireland Local Government Association (NILGA) (2020), ['Tackling Modern Slavery: Guidance for Councils'](#).

⁴ Convention of Scottish Local Authorities (COSLA) (2019), ['Human Trafficking and Exploitation: Guidance for Scottish Local Authorities'](#).

⁵ Scottish Government (2019), ['Human trafficking and exploitation: guidance for health workers'](#).

⁶ Royal College of Nursing (2018), [Modern Slavery Wheel](#).

⁷ Independent Anti-Slavery Commissioner (IASC) (2020), [letters to Royal Colleges](#) (under "letters" tab).

⁸ Sian Oram et al. (2015), ['Provider Responses Treatment and Care for Trafficked People: Final Report for the Department of Health Policy Research Programme: Optimising identification, referral and care of trafficked people within the NHS'](#).

⁹ [National Referral Mechanism \(NRM\) data](#).

¹⁰ Scottish Government (2020), ['DtN and provide information about victims: consultation analysis report'](#).

A public health approach to modern slavery

1.3.1 In 2017, Public Health England (PHE) published a research summary¹¹ examining the role of public health in modern slavery. This research highlighted the serious health consequences of modern slavery at both an individual and population level and noted the limits of a law enforcement led response in meeting the needs of survivors. The project identified several areas for public health involvement in anti-slavery efforts, including a role for public health leaders in driving this agenda. Subsequent work¹² to build on this research has identified an emergent public health approach to modern slavery but this needs to be translated into effective action.

1.3.2 In February 2020 I jointly chaired a roundtable with PHE to discuss a public health approach to modern slavery, bringing together a range of academics, policy makers and practitioners. We considered the value of taking a broad preventative approach to modern slavery using public health principles to understand the health needs and experiences of survivors, to identify the training needs for health professionals and to inform the development of multi-agency partnerships. We discussed the rapid evidence assessment undertaken by Such et al.¹³ and I was encouraged to hear about examples of existing good practice. This included the partnership approach undertaken by PHE in the West Midlands, a pilot project carried out by the VITA Network¹⁴ to deliver training to up to 3,000 junior doctors and the development of professional training standards for care by the Snowdrop Project and St Mary's University.¹⁵

1.3.3 The roundtable identified three areas of work to progress. Firstly, PHE committed to leading the development of a framework for multi-agency partnerships to respond to modern slavery through a public health lens. In addition, PHE agreed to develop work to better understand the health needs of victims in the way that we understand the health needs of other vulnerable populations. Lastly, there was a commitment to encouraging consistent standards in care, including an understanding of how the system needs to change to best support survivors. Public health approaches are not new, and much can be learnt from other complex policy areas, such as serious violence¹⁶ and child sexual exploitation (CSE).¹⁷ However, it is important to acknowledge how modern slavery is different and why there is a need for a public health approach that accounts for these unique vulnerabilities.

1.3.4 Due to the impact of Covid-19, PHE has had to place these actions on hold in the short to medium term. I look forward to reconvening this work and the launch of the framework to support multi-agency partnerships in tackling modern slavery through a public health lens.

Improving the quality of victim support

1.4.1 Spending time with victims and survivors of modern slavery is an important part of my role. Over the past year I have met victims in NRM safehouses, in National Asylum Support Service accommodation, in faith buildings, at conferences and through community groups. I have

¹¹ Public Health England (PHE) (2017), [‘Modern Slavery and Public Health’](#).

¹² E. Such et al. (2020), ‘Modern slavery and public health: a rapid evidence assessment and an emergent public health approach’, *Public Health*.

¹³ Ibid.

¹⁴ [VITA Training](#).

¹⁵ Not yet published. For more information, see [Centre for the Study of Modern Slavery](#).

¹⁶ LGA (2018), [‘Public health approaches to reducing violence’](#).

¹⁷ PHE and Association of the Directors of Public Health (2019), [‘Child Sexual Exploitation: How public health can support prevention and intervention’](#).

also been introduced to Survivor Alliance, an international non-governmental organisation (NGO) set up to empower and unite survivors and I have been pleased to see its members involved in various meetings and events. Having recently met with Minh Dang, Executive Director of Survivor Alliance, I look forward to exploring further opportunities for collaboration. I also hold quarterly meetings with a variety of NGOs from the sector to ensure that I am sighted on key issues and regularly use my convening powers to bring together voices and where required, raise concerns with ministers and officials.

1.4.2 I have been impressed with the dedication and compassion of the organisations who are doing their best to support victims, but it is evident that the NRM is under significant pressure. In 2017 the Home Office announced¹⁸ a series of important reforms to the NRM and whilst I acknowledge the progress that has been made over the past year, I remain concerned that the system is still not doing enough to protect vulnerable victims. I understand that the Home Office is now in the early stages of planning for a programme of NRM Transformation. It is essential that this work carefully considers where the system isn't working and engages with stakeholders and survivors to inform the new model.

1.4.3 The timeliness of NRM decisions remains a significant concern, particularly in England and Wales. I have met individuals who have been waiting in excess of two years for their conclusive grounds (CG) decision which is unacceptable. In October 2019 I wrote to ministers¹⁹ to raise this issue and to highlight the impact of delays on the well-being of victims. I am provided with NRM decision data on a confidential basis each month which enables me to monitor this issue closely. Ministers have assured me that extra resources have been put in place to reduce mounting backlogs within the system. I strongly believe that it is in the public interest for this data on decision making to be published by the Home Office and I am pleased that they gave me permission to publish the data in this report.²⁰

1.4.4 Since my appointment, I have visited Single Competent Authority (SCA) teams in Leeds and Birmingham and have been struck by the commitment of the operational officers who are responsible for NRM decision making. The visit to Leeds demonstrated the complex interactions between the NRM and the asylum system and I am aware of continuing unease in the sector regarding disparity in the experiences of European Economic Area (EEA) and non-EEA nationals. To understand the impact that delays in either system can have on the other, I have asked the Home Office for data on the number of individuals within the NRM who have been waiting for a decision on their asylum claim in excess of 12 months to establish if there is a disproportionate number of victims at the higher end of waiting times. I also intend for my office to conduct an audit of case files to examine the extent to which victims are interviewed within the NRM and the rationale for who is interviewed.

1.4.5 The Home Office has confirmed that The Salvation Army (TSA) has been awarded the new VCC for the next five years.²¹ This is an important announcement and I hope that the Home Office will continue to work closely with TSA to ensure that the VCC offers a needs-based and victim-centred system of support. I am also pleased to hear that the contract will offer the 'places of safety' that were promised as part of the NRM reforms, offering three days' emergency accommodation pre-NRM. This has the potential to assist First Responders who often experience difficulties in identifying emergency accommodation for victims pre-NRM, as well as providing victims with more time to make an informed decision about the NRM. Although progress on the

¹⁸ Home Office (2017), ['Modern slavery victims to receive longer period of support'](#).

¹⁹ IASC (2019), [letter to Victoria Atkins MP](#).

²⁰ See Appendix B.

²¹ Home Office (2020), ['New contract to deliver improved support for modern slavery victims'](#).

Care Quality Commission inspection regime has been slow, it is positive to see that the agreed framework reflects Slavery and Trafficking Survivor Care Standards²² and that there is further work planned on how best to incorporate survivor voices.

1.4.6 Over the past year, I have become aware of issues relating to NRM subsistence payments. The current policy position on subsistence is clear; it is not a means-tested payment. This is confirmed in the 2018 Judgement *K & AM v SSHD*²³ and in Schedule 2 of TSA's VCC.²⁴ Despite this, I understand that there are still cases where individuals are not receiving the subsistence to which they are entitled. I have written an open letter²⁵ to the NGO sector setting out the entitlements. I am also concerned about reports of individuals receiving deductions from other means-tested benefits as a result of NRM subsistence. I have met with the Department for Work and Pensions (DWP) and have received assurance that NRM subsistence would not be considered un-earned income in relation to Universal Credit. I will continue to monitor this.

1.4.7 I have met with overseas domestic workers to understand the challenges that this migrant population face. I share their concerns about the lack of progress in implementing the recommendations from James Ewins QC's 'Independent Review of the Overseas Domestic Worker Visa'²⁶ which was published in 2015. I have written to ministers to raise these concerns²⁷ and recently met the minister for immigration to seek clarification about progress on the introduction of information sessions for overseas domestic workers in the UK and the provision of information leaflets at visa application centres overseas. While I have been reassured that the recommendation for the provision of information leaflets has been introduced, I am concerned that five years on from the Review, information sessions for overseas domestic workers in the UK have not been implemented.

1.4.8 Five years on from the Modern Slavery Act, I am pleased that the Home Office has published its Section 49 Statutory Guidance for England and Wales.²⁸ This document is useful in consolidating existing guidance and is a comprehensive resource for organisations who have a role in identifying and supporting victims of modern slavery. My office has been invited to join the Statutory Guidance Reference Group and we will continue to stress the importance of ensuring that survivor voices are incorporated in a meaningful way.

Taking a longer term view

1.5.1 To live a life of sustainable independence, it is fundamental to have access to decent work, education and training where needed and suitable accommodation. Whilst the NRM can provide short-term support to those in crisis, I remain concerned that the current system is not doing enough to equip individuals to become survivors. At present, most victims from outside the EEA are unable to work whilst they are in the NRM and further restrictions on the right to work of migrants following Britain's exit from the European Union (EU) is likely to exacerbate this issue further. Whilst not every victim will want to work, or will be in a position to do so, it is extremely powerful when victims are able to access good work and begin to recover their dignity. This was

²² Human Trafficking Foundation (2018), '[Slavery and Trafficking Survivor Care Standards](#)'.

²³ [K & AM v SSHD \[2018\] EWHC 2951](#) (Admin).

²⁴ Home Office (2015), '[Modern Slavery – Adult Victims of Human Trafficking \(Modern Slavery\) Care and Co-ordination Services: Schedule 2 – Authority Requirements](#)'.

²⁵ IASC (2020), '[open letter on NRM subsistence payments](#)'.

²⁶ James Ewins QC (2015), '[Independent Review of the Overseas Domestic Worker Visa](#)'.

²⁷ IASC (2020), '[letter to Kevin Foster MP](#)'.

²⁸ Home Office (2020), '[Modern Slavery Act 2015 – Statutory Guidance for England and Wales](#)'.

evidenced in a recent report²⁹ by Kalayaan which contrasted the experiences of overseas domestic workers who were permitted to work whilst in the NRM with those who were not.

1.5.2 I am acutely aware of the complex policy issues that surround immigration and access to paid work but remain convinced that it is in the best of interests of victims to be able to work and make positive contributions to society. I have suggested that the Home Office should run a pilot that would permit victims within the NRM access to paid work within the parameters of a project specifically designed for that purpose and have been disappointed with the response. Home Office Borders, Immigration and Citizenship System is undertaking a review of asylum seekers' right to work and ministers would prefer to wait for the findings from this work before considering whether to bring forward any specific scheme for victims of modern slavery. In the meantime, I will be working closely with key stakeholders to build the evidence base on both the benefits of work and the harms of not working and ensure that this is communicated to ministers.

1.5.3 One of the most significant concerns I have identified in the sector in relation to victims is the sudden cessation of support at the end of the NRM. Following successful litigation in 2019, the VCC now provides continued support to those unable to exit following their CG decision, in accordance with their Recovery Needs Assessment.³⁰ This has renewed focus on the responsibilities of local authorities and NGOs in providing support post-NRM. However, this has not been accompanied by additional funding outside the VCC and there is still a limited understanding of how best to transition individuals out of the NRM and into mainstream support. I am aware that TSA and their sub-contractors are experiencing difficulties in exiting those from the NRM who have no recourse to public funds (NRPF) or other entitlements to support.

1.5.4 The six local authority pilots were established in order to inform thinking on this post-NRM pathway, and we are still awaiting publication of the findings. I am aware that the Home Office has since proposed two further projects to examine the challenges of providing accommodation for victims and supporting those with complex needs. These are important pieces of work but it is essential that they incorporate any recommendations identified by the pilots and that they also draw on the significant amount of learning that is available from other complex policy areas such as domestic abuse.

1.5.5 Many survivors of modern slavery, particularly those who are from countries outside the EEA, also face difficulties in accessing education. Being able to access English as a Second Language classes is an important first step and can be crucial in allowing survivors to integrate into communities. However, I am aware that there are often funding limitations and many are still exiting the NRM without having been able to develop these vital skills. I understand that without the right to work, many are unable to access the opportunities that apprenticeships provide and that those with NRPF are often prevented from progressing beyond level 3 education. I am encouraged by the work of the Free-Thinking Programme run by Northern College³¹ and during a recent visit to Northern Ireland was pleased to see many survivors of modern slavery enrolled on college courses. Over the next year I will continue to identify what more can be done to increase survivor access to education and training.

²⁹ Kalayaan (2019), [‘Dignity, not destitution: The impact of differential rights of work for migrant domestic workers referred to the National Referral Mechanism’](#).

³⁰ Home Office (2019), [‘Recovery Needs Assessment \(RNA\)’](#).

³¹ Northern College (2019), [‘Education for the survivors of Modern Slavery: Free Thinking Programme’](#).

Improving the support to child victims

1.6.1 In 2019/2020, 4,845 children were referred into the NRM, representing 42.7% of all referrals.³² In the last two quarters of 2019/2020, 83.7% of the 1,291 referrals for British children involved criminal exploitation.³³ I understand that the profile of victims is changing with cases of children as young as seven and those previously unknown to statutory services being targeted and exploited.³⁴ Whilst it is positive to see increasing awareness and more children being referred into the NRM, identification is not enough. To prevent further exploitation there needs to be substantive child protection activity.

1.6.2 Since my appointment, one of my priorities has been to understand what is happening to safeguard children who are identified as potential victims of modern slavery. I have been made aware of multiple issues within the system, including difficulties in applying existing child protection frameworks in the context of extra-familial abuse, gaps in knowledge among professionals about the NRM, inefficient processes for information sharing and examples of agencies still working in silo. Whilst intended to examine the impact of the Modern Slavery Act's Section 45 defence on the criminal justice system, the case examples recently submitted to my call for evidence reflected many of these issues and highlighted considerable disconnect between the NRM and local child protection processes.

1.6.3 I have been encouraged by the work being undertaken by the Contextual Safeguarding Programme at Bedfordshire University³⁵ which recognises a need for alternative approaches to child protection given that a significant amount of risk relating to the exploitation of children now comes from environments outside the home. I also welcome the work to develop the Wales Safeguarding Procedures³⁶ which are available for practitioners to download in a mobile app. This has consolidated existing policy and procedure to provide consistent guidance on safeguarding children, recommending a child-centred and collaborative approach for all agencies responding to CCE, CSE and child trafficking.

1.6.4 Despite pockets of good practice in safeguarding trafficked children, it is clear that there is a need for radical reform of the system. I have publicly made calls for the Home Office to devolve NRM decision making for children locally and I am pleased that a pilot to trial this approach is currently being established. It is essential that these pilots are properly funded and that they test a series of different models to identify what works. My office will be supporting the development of this work and has recently collaborated with ECPAT UK on a rapid evidence assessment to draw learning from existing multi-agency decision making models.³⁷ My office has collaborated with the Home Office to convene several roundtables for local authority stakeholders to discuss potential approaches to devolved decision making and the key considerations that need to be made.

1.6.5 I remain gravely concerned about the risk of re-trafficking and have raised this issue on multiple occasions with the Home Office. It is essential that we understand the extent of this

³² See Appendix B.

³³ This data is from Home Office NRM quarterly reports, excluding dual nationality and including where criminal exploitation is reported alone or alongside other forms of exploitation. See: [National Referral Mechanism statistics](#).

³⁴ The Children's Society (2019), '[Counting Lives: Disrupting Child Criminal Exploitation](#)'.

³⁵ Carlene Firmin (2017), '[Contextual Safeguarding: An overview of the operational, strategic and conceptual framework](#)'.

³⁶ Children in Wales (2019), [Wales Safeguarding Procedures](#).

³⁷ IASC (2020), '[IASC Rapid evidence assessment: Multi-agency decision making](#)'.

issue and that there is the ability to flag cases where children have been referred into the NRM on more than one occasion. The SCA has recently moved to a new digital case management system for the NRM, which may present an opportunity for new processes, so I will continue to stress the importance of this data.

1.6.6 The Scottish Guardian Service continues to provide comprehensive support to children who are victims of trafficking and unaccompanied asylum seeking children in Scotland. Over the course of the last year, the Scottish Government has been developing the Independent Child Trafficking Guardian (ICTG) service to help provide national support for child victims, and those at risk, of trafficking. ICTGs in Scotland were the subject of a consultation between August and November 2019.³⁸ The new service will put the role of the Guardian on statutory footing in Scotland with other support services. It is anticipated the new service will be implemented in 2021.

1.6.7 Despite evidence of good practice, I am extremely disappointed that national roll-out of the ICTG service has still not been achieved five years on from the Modern Slavery Act. Over the past 12 months there have been important developments and ICTGs are now in place across a further three early adopter sites using a two-tier model of support as recommended by the 2019 evaluation.³⁹ I have been sighted on the preliminary findings from an independent evaluation of the Regional Practice Co-ordinators (RPCs) and whilst I have some reservations about the capacity of the RPCs given the volume of referrals for UK nationals, it is positive to see their impact in developing local processes and encouraging multi-agency collaboration. Now that this evaluation is complete, national roll-out of the service must commence immediately and I will continue to hold the Home Office to account for this.

³⁸ Scottish Government (2019), '[Child trafficking guardians: consultation](#)' and Scottish Government (2020), '[Independent child trafficking guardians: consultation analysis](#)'.

³⁹ Ravi KS Kohli et al. (2019), '[An evaluation of Independent Child Trafficking Guardians – early adopter sites](#)'.

Priority 2: Supporting law enforcement and prosecutions

2.1.1 Law enforcement and prosecution play an important role in the eradication of modern slavery as part of strategies which also focus on prevention and protection. More offences of modern slavery have been recorded in the last year and the number of police operations has increased. The Modern Slavery and Organised Immigration Crime (MSOIC) Unit has continued to make a positive contribution and provided leadership and coordination.⁴⁰ I am pleased that the Home Secretary has agreed to fund the unit in the next financial year. Prosecutions for defendants in modern slavery flagged⁴¹ cases have fallen over the last financial year and prosecutions for offences under the Modern Slavery Act remain low and have been decreasing.⁴²

Coordinating the whole system

2.2.1 I have used my role to argue strongly for an intelligent, nationally coordinated approach to law enforcement. Modern slavery offending is mostly organised due to the need to recruit, move, control and exploit victims for profit and is nearly always cross-border. I remain concerned that this is not reflected in the structures and operational arrangements of forces, and between forces. For an offence which is not constrained by borders or jurisdictions, the lack of consistency makes communication and intelligence sharing a challenge. Many cases involve lower sophistication organised crime groups (OCGs) which should be within the capability of territorial police forces but their efforts need to be coordinated. I have often heard that detectives have identified the links between criminal networks on national training courses rather than national intelligence or tasking processes. This needs to change.

2.2.2 I therefore warmly welcome the Modern Slavery and Human Trafficking National Targeting Centre which will be established later this year to provide coordination and develop intelligence at a tactical level to identify threats. It is particularly important that this capability enables cross-force coordination and collaboration and is able to identify the appropriate investigative agency. I have also met with Sir Craig Mackey as part of his review into serious organised crime and am optimistic that his recommendations, if implemented, will lead to a more coordinated response across all forces.

2.2.3 I have had extensive engagement with law enforcement including Police Scotland and the Police Service of Northern Ireland and the section on **Taking a UK-wide approach** gives further details. In October 2019 I wrote to the chief constables of the police forces in England and Wales to ask a number of questions about their response to modern slavery and human trafficking (MSHT). All 43 chief constables replied to my letter and we produced a summary of their replies.⁴³ Over the last few years forces have developed their response to modern slavery and human trafficking. The MSOIC Unit monitors levels of operational activity. The number of live

⁴⁰ Formerly the Modern Slavery Police Transformation Unit (MSPTU).

⁴¹ The Crown Prosecution Service (CPS) maintains a central record of prosecution outcomes with reference to a number of case monitoring flags, including modern slavery. Although charges specifically related to a flag may be considered at the time of the pre-charge decision, the defendant may in fact be charged with another offence. Similarly, there may be cases where a person is convicted of a lesser offence than that with which they were proceeded against.

⁴² See Appendix B. Data on prosecutions and convictions from the Ministry of Justice refers to modern slavery on a principal offence basis. There will be other modern slavery prosecutions that are not counted in this data set as defendants may have been prosecuted for a more serious offence. In the last two years, MoJ experimental data shows there have been between two and three times as many prosecutions of modern slavery as a non-principal offence than as a principal offence.

⁴³ IASC (2020), [letter to Kit Malthouse MP - Chief constable responses](#).

operations has increased to at least 1,763 as of April 2020, a rise of 28.9% (393)⁴⁴ from a year ago but the number of prosecutions has fallen. I am aware that this reflects broader issues in policing but the increased resourcing of police forces in the next few years provides every chief constable with an opportunity to ensure that adequate investment is made in the expertise required for MSHT investigations. Investigating exploitation can generate many lines of enquiry and police officers should not be afraid of uncovering the networks behind exploitation due to concerns about a lack of resources to investigate.

2.2.4 Over the last year I have had constructive and regular engagement with the National Crime Agency (NCA) at all levels including the director general. The Agency's priorities are clearly articulated as "tackling high harm, high impact offenders who exploit the vulnerable through modern slavery and human trafficking".⁴⁵ The Agency has carried out several successful operations including a multi-force investigation into a Chinese national who was a prolific enabler of sex trafficking. The investigation uncovered 446 addresses which had been rented to criminal groups who set them up as brothels, cannabis farms or to house illegal immigrants. This case illustrates the poly-criminality of traffickers which covers sexual exploitation, criminal exploitation and organised immigration crime. While encouraged by recent briefings about live operations I would still want to see more MSHT investigations on the NCA's priority grid. While most investigations will rightly belong in local forces or the regional organised crime units it is important for the NCA to take on the most sophisticated networks where their specialist capabilities can be deployed.

2.2.5 I have been briefed on the work of the National Data Analytics Solution which is using advanced data analytics to help police forces understand the networks linked to the threat of modern slavery and child criminal and sexual exploitation. This innovative use of technology provides an opportunity to systematically target the networks and protect victims. It is vital that barriers to sharing data are overcome so that police forces and agencies such as DWP and Her Majesty's Revenue & Customs (HMRC) can contribute to the analysis and thereby improve the quality of the insight.

2.2.6 The tragic death of 39 people in October focused attention on the trafficking of Vietnamese people to the UK. Previous studies carried out by my office⁴⁶ had identified the way in which Vietnamese migrants may pay smugglers for a journey but frequently they can be trafficked on that journey or exploited upon arrival in the UK. It is also clear that OCGs do not differentiate between smuggling people and exploiting victims. In the light of this case I have requested that the National Assessment Centre be commissioned to undertake a review of the exploitation of Vietnamese nationals in the UK. I think that it is important to understand the impact on victims and the impact on the state caused by irregular migration and the subsequent exploitation of Vietnamese nationals in the UK. There appears to be a spectrum of issues from failure to comply with the law on minimum wages right up to slavery offences. The opportunity to understand the pull factors which attract migrants from Vietnam will provide a valuable case study. The review should also identify the opportunities for interdiction across policy, strategy and operations.

⁴⁴ Data obtained from the Modern Slavery and Organised Immigration Crime (MSOIC) Unit (2020).

⁴⁵ National Crime Agency (2020), '[National Strategic Assessment of Serious and Organised Crime](#)'.

⁴⁶ IASC (2017), '[Combating modern slavery experienced by Vietnamese nationals en route to, and within, the UK](#)'.

2.2.7 The profile of victims referred into the NRM continues to change and in the last two quarters of 2019/2020, almost 40% of cases involved criminal exploitation.⁴⁷ This is particularly striking in terms of 1,513 children having been referred for criminal exploitation in quarters three and four of 2019/2020.⁴⁸ Many of these children will have been caught up in drug dealing by way of county lines. This is a particularly abhorrent abuse of children and vulnerable adults and results from developments in illegal drug markets across England and Wales. These children are victims of trafficking and I have publicly called for the greater use of offences under the Modern Slavery Act to ensure that offenders are convicted of exploiting children rather than just for supplying drugs. I was pleased to see that an inspection by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) into county lines drug offending⁴⁹ emphasised the importance of pursuing Modern Slavery Act offences wherever possible in county lines cases.

2.2.8 In 2017 there was an important inspection of forces' responses to modern slavery⁵⁰ and I was keen for forces to be re-inspected. I met with HMICFRS staff and we agreed that a re-inspection using the 2017 framework was not appropriate and that a new inspection would have to be developed. I formally requested that a new inspection was undertaken and was disappointed to hear that HMICFRS did not feel able to accommodate this additional inspection within their plan for 2020. I will continue to press for a further thematic inspection on modern slavery.

Increasing prosecutions

2.3.1 If offenders think that there is a very low risk of prosecution, then they are not deterred from committing what is essentially an economic crime – estimated to be worth \$150bn a year by the International Labour Organization.⁵¹ While the level of operational activity has increased over the last few years, increases in prosecutions have not been sustained in 2019/2020. The Crown Prosecution Service (CPS) reported that the number of defendants prosecuted decreased from 322 in 2018/2019 to 301 in 2019/2020, with the number of defendants convicted rising from 219 in 2018/2019 to 224 in 2019/2020. However, this includes defendants in all modern slavery flagged cases. The number of prosecutions and convictions under the Modern Slavery Act is much more modest. In 2019/2020 there were 67 prosecutions under the Act as opposed to 301 flagged prosecutions in 2019/2020. While I support the collation of the broader set of statistics there does need to be scrutiny of the low number of prosecutions and convictions under the Modern Slavery Act. The decrease in prosecutions and convictions for pre-cursor offences since 2017/2018 has not been accompanied by a consistent increase in prosecutions and convictions under the Modern Slavery Act. Whilst 2019/2020 saw a small increase in convictions, the number of prosecutions under the Act has, in fact, decreased. Overall, the number of prosecutions in

⁴⁷ This follows changes to NRM recording practices and includes data where criminal exploitation is reported alone or alongside other forms of exploitation.

⁴⁸ Prior to 1 October 2019, potential victims of modern slavery were recorded as having a single 'primary' exploitation type, grouped into five distinct categories: labour, sexual, domestic servitude, organ harvesting or unknown exploitation. Following changes to the way NRM data is collected, criminal exploitation has been split from labour exploitation. In addition, potential victims can also be recorded as experiencing multiple exploitation types. This figure is for all children where criminal exploitation is recorded either alone, or alongside other forms of exploitation.

⁴⁹ Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) (2020), ['Both Sides of the Coin: An inspection of how the police and National Crime Agency consider vulnerable people who are both victims and offenders in 'county lines' drug offending'](#).

⁵⁰ HMICFRS (2017), ['Stolen freedom: the policing response to modern slavery and human trafficking'](#).

⁵¹ International Labour Organization (ILO) (2014), ['Profits and Poverty: The Economics of Forced Labour'](#).

2017/2018 under the pre-cursor offences and the new Act (142) was double the number of prosecutions in 2019/2020 (71).⁵²

2.3.2 I have held regular bi-monthly meetings with the CPS and early on they expressed concern that the number of individuals being referred to the CPS for MSHT offences had fallen in 2018. I feared that this reduction could potentially lead to fewer prosecutions and convictions in the future and therefore raised this in my letter to chief constables in October 2019. Ultimately the number of referrals to the CPS increased to 289 in 2019/2020 but the levels of successful criminal justice outcomes are still too low. The assessments by the Cabinet Office clearly showed that where modern slavery is investigated by dedicated resources with training and knowledge prosecution rates rise. Of the ten forces with the highest numbers of prosecutions, nine had some sort of modern slavery or exploitation investigation unit in place.⁵³

2.3.3 The Modern Slavery Act created two valuable ancillary orders, Slavery and Trafficking Risk Orders (STROs) and Slavery and Trafficking Prevention Orders (STPOs). The risk orders can be particularly helpful when investigations are lengthy and make it possible to protect victims prior to prosecution. The use of risk orders has remained consistent over the last three years (24 in 2017/2018, 11 in 2018/2019 and 26 in 2019/2020) in England and Wales.⁵⁴ There were no Trafficking and Exploitation Risk Orders granted in Scotland in 2019/20.⁵⁵ In Northern Ireland the legislation did not include risk orders but I urged the minister for justice when I met her in February 2020 to reconsider their value as evidence of effective use in England and Wales and Scotland emerges.

2.3.4 Early increases in the number of prevention orders in England and Wales have not been sustained (30 in 2017/2018, 50 in 2018/2019 and 28 in 2019/2020).⁵⁶ There were six Trafficking and Exploitation Prevention Orders granted in Scotland in 2019/20.⁵⁷ It is policy to put risk and prevention orders on nominal records on the Police National Computer so that they are available to all forces. However, it is clear from a recent audit that this is not happening consistently and this is a concern.⁵⁸ Forces also need to proactively manage the risk posed by offenders and have processes in place to monitor compliance with both of these ancillary orders.

Protecting victims of trafficking

2.4.1 The Modern Slavery Act provides a defence for those who, in the case of adults, have been compelled to commit an offence as a direct result of their being a victim of modern slavery, or in the case of a child, have committed an offence as a direct result of being the victim of modern slavery. This is an important protection for victims of modern slavery however there has been a continuing concern that some victims are not being protected by this legislation and that the opportunistic are seeking to abuse it. In January I launched a call for evidence⁵⁹ to better

⁵² See Appendix B.

⁵³ IASC (2020), [letter to Kit Malthouse MP - Chief constable responses](#).

⁵⁴ See Appendix B.

⁵⁵ Scottish Government (2020), [‘Trafficking and Exploitation Strategy – Third Annual Progress Report and Strategy Review’](#).

⁵⁶ See Appendix B.

⁵⁷ Ibid. Between 1 April 2019 and 31 March 2020, six people were convicted of relevant offences and all six were made subject to TEPOs. It is important to note that this data is based on the date of conviction rather than the date of report to the Crown Office and Procurator Fiscal Service (COPFS).

⁵⁸ Letter from the MSOIC Unit to chief constables, shared by the MSOIC Unit (June 2020).

⁵⁹ IASC (2020), [‘IASC Call for Evidence: Use of the Modern Slavery Act’s Section 45 statutory defence’](#).

understand what is happening on the ground and by the beginning of March I had received 107 responses including 220 cases.

2.4.2 My team is currently analysing the responses and we will publish a review later in the year. Thirty seven out of 43 forces in England and Wales provided cases which illustrates the challenges and frustrations that are being experienced at a local level. However nearly 90% of those cases related to the cultivation and supply of drugs and associated violence which suggests that this is where the defence is being used most frequently. Given the considerable public concern about serious youth violence, gangs and county lines drug supply we need to understand whether the desire to protect victims of trafficking may be undermining efforts to tackle horrific levels of youth violence which disproportionately impact the most deprived communities.

2.4.3 The cases reviewed showed that police were not identifying potential victims early enough or proactively considering whether the defence might apply. Prosecutors appeared to be over-relying on the decision making of the SCA when deciding when to proceed and defendants and their representatives were raising the defence late in the criminal justice process. These issues combine to provide opportunities for abuse by those who are willing conspirators but also the potential for victims to be wrongly convicted. Most of the cases involved children and I am far from convinced that there is adequate child protection for these victims once identified nor are police pursuing the criminal networks responsible for the trafficking in most cases.

Equipping professionals

2.5.1 Caroline Haughey QC's Review of the Modern Slavery Act (2016)⁶⁰ made far-reaching recommendations for the training of police officers, lawyers and the judiciary in response to what she described as a "patchy response". In my strategic plan I set out the importance of training and while there are examples of good practice I am concerned that provision is still patchy. Professionals need to be supported with policy and guidance as well as appropriate training opportunities.

2.5.2 The MSOIC Unit has developed a substantial volume of guidance and this is available to officers on the College of Policing Knowledge Hub. The core Authorised Professional Practice on modern slavery is out of date and I welcome the current effort to rewrite material in order to provide reliable guidance for officers. At some point the College of Policing will assume responsibility for updating this material and it is essential that they have sufficient staff with the appropriate expertise and knowledge to do this well. I have held a series of meetings with the head of the College to impress this point and he has responded positively.

⁶⁰ Caroline Haughey QC (2016), ['Modern Slavery Act 2015 review: one year on'](#).

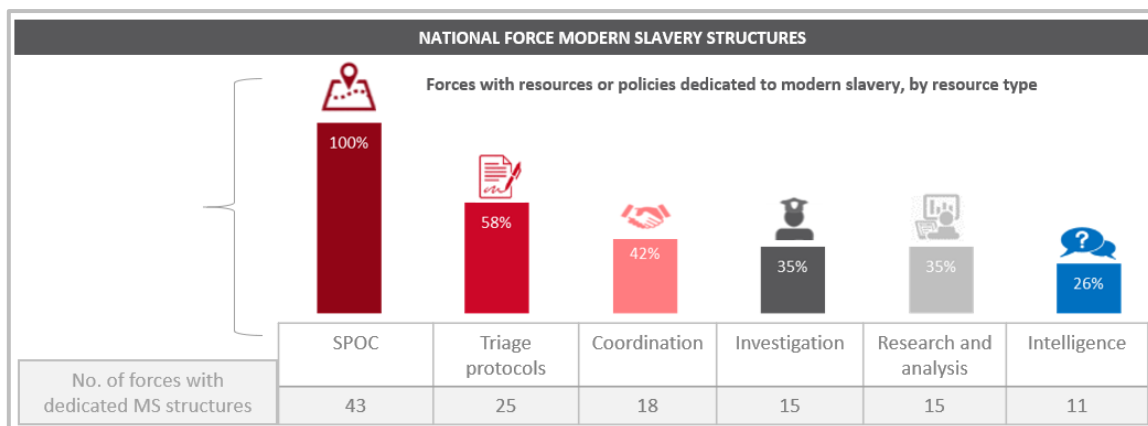


Figure 2: National force modern slavery structures⁶¹

2.5.3 The MSOIC Unit has also developed two important training courses. The first is an e-learning course aimed at providing basic awareness for all officers and the second is a four-day course for investigators that they have been running since 2017. The e-learning course is currently being updated jointly by the MSOIC Unit and the College and I hope that it can be launched soon. I attended one of the four-day courses and was impressed with the training material, the delivery and the commitment of attendees. I am pleased that the material will be uploaded onto the College’s managed learning environment but I am concerned that there will be no national delivery. In 22 of the responses from chief constables there was specific mention of the high value of this training and its delivery by experts. I would hope that the College would be able to prioritise delivery of this specialist training.

2.5.4 However, these training courses alone will not equip officers to deal with the complexity of modern slavery and it is essential that the whole of the curriculum references the issue where appropriate. For example, newly recruited officers need to understand their role as First Responders so that they can identify victims of modern slavery, give them informed advice and refer them for appropriate support. Investigators need to understand the statutory defence, the concept of alpha victims and the value of STROs and STPOs. Specialist child protection courses and senior investigators need to understand the characteristics of CCE as well as CSE. These issues need to be fully understood by officers who would traditionally not expect to encounter victims of modern slavery, particularly officers investigating gangs and networks involved in the supply of drugs. This is an area where much work needs to be done and I will continue to emphasise its importance.

2.5.5 Training within the criminal justice system has improved but is still not sufficient. The CPS mandates face to face modern slavery training for prosecutors in Complex Case Units, Central Casework Divisions and overseas Criminal Justice Advisors. A training package has also been published for all CPS Area legal training leads for face to face delivery in prosecution team meetings. Face to face training on the non-punishment principle including the statutory defence has been delivered to eight youth and magistrates’ courts where there is a significant volume of county lines cases.

2.5.6 As part of their response to my call for evidence on the use of the statutory defence the Magistrates Association polled their members and 331 responded. Most magistrates who responded had seen the defence raised in the youth courts but most did not feel confident in responding to the defence. I have met with the head of training at the Judicial College who is

⁶¹ Provided by the MSOIC Unit (data as of January 2020).

responsible for the training of both magistrates and judges and raised this concern with him. He has assured me that there are plans to include material on modern slavery in both magistrates' and legal advisors' training and this will be completed by autumn 2020. Modern slavery is covered in the appropriate Magistrates Court Bench Book but this was last published in 2018 and needs to be updated.

2.5.7 We also discussed the approach to the training of judges which relies on self-learning and regular e-bulletins from the College. There is one course, Technical and Technological Aspects of Crime, which is part of the CPD programme and covers the statutory defence. This is apparently well attended. I was disappointed at the low level of training provided to judges in England and Wales and sought reassurance that this would be addressed. In October I spoke at the Judicial Institute for Scotland as part of a seminar which included contributions from a former Lord Advocate and a Supreme Court judge – both with expertise in modern slavery.

Priority 3: Focusing on prevention

3.1.1 While victim protection and prosecutions are essential in the fight against modern slavery, we need to do much more to tackle the systems and structures that allow it to thrive. Raising public awareness is important and government can play its part through legislation, policies and procurement. However, with an estimated 16 million people trapped in forced labour in the private sector globally,⁶² business must share some of the responsibility for reform. This is reflected in the Modern Slavery Act which is the first piece of national legislation that requires businesses of a certain size to report annually on the steps they are taking to address modern slavery risks.

3.1.2 The sectors at highest risk are thought to be those that employ large numbers of low or semi-skilled workers, particularly those relying on a substantial migrant workforce such as agriculture, construction or hospitality, or those dominated by informal businesses such as hand car washes or nail bars. In reality, any business is at risk of unwittingly using exploited labour, domestically or internationally, particularly if it has long and complex supply chains.

Working with the private sector

3.2.1 Over the past year I have met businesses that are working hard to find and mitigate risk, trialling new methods and technologies and engaging with workers across supply chains. But there are many paying lip service to legislation and failing to take action that will bring any lasting change. I set out a suggested company progression matrix in my maturity framework,⁶³ published with my review on Operation Fort.⁶⁴ This generic framework could apply to most industries. It is not fixed and should evolve as understanding becomes more sophisticated. The review also sets out my four challenges to CEOs in my 2020 agenda for action.⁶⁵

3.2.2 Combatting modern slavery cannot be carried out in isolation. It should be part of a wider human rights due diligence agenda based on dignity, decent work and providing adequate safeguards for all workers. This is encapsulated in the work of the British Academy's Future of the Corporation project Principles for Purposeful Business⁶⁶ which calls on businesses to focus on solving rather than causing problems for society and the environment. The Principles put UN Sustainable Development Goal 8⁶⁷ at the top of the agenda, calling on businesses to put purpose before profit and find ways of measuring their impact. I will continue to engage with British Academy projects this year and also work with other organisations, including the Ditchley Foundation, on issues which create vulnerability such as economic insecurity.

3.2.3 In the most positive examples I have found, businesses are demonstrating a willingness to move beyond legal compliance and work within a broader human rights framework. However they are still being forced to compete against less responsible competitors. Section 54 of the Modern Slavery Act was intended to level up this playing field. It requires all eligible companies

⁶² ILO (2017), ['Global Estimates of Modern Slavery: Forced Labour and Forced Marriage'](#).

⁶³ See Appendix C.

⁶⁴ IASC (2020), ['Operation Fort - What businesses should learn from the UK's largest anti-slavery prosecution'](#).

⁶⁵ See Appendix D.

⁶⁶ The British Academy (2019), ['Principles for Purposeful Business'](#).

⁶⁷ [SDG 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.](#)

with a turnover of £36m or more to report on what steps, if any, they have taken to tackle modern slavery in their supply chains and to publish a statement annually.

3.2.4 This light touch legislation sets a low bar for compliance, requiring that the statement is approved by the board and signed off by a director or equivalent, and accessible via a prominent link on the company homepage. Nevertheless, lack of business compliance even with these simple requirements continues to be a concern.

3.2.5 The Home Office wrote to the chief executives of 17,000 businesses in 2018⁶⁸ with clear instructions for reporting. It set out a plan to audit modern slavery statements in 2019 and to publish a list of non-compliant companies.⁶⁹ The audit has been completed and the Home Office has shared the high levels findings with me.⁷⁰ The government has since issued guidance in the light of Covid-19, acknowledging the pressure that some businesses are under and relaxing the deadlines in the Statutory Guidance by which those affected must produce their annual modern slavery statements.⁷¹ I appreciate that the government does not want to put undue pressure on business during this challenging time. Nevertheless, the audit was conducted before the Covid-19 pandemic impacted the UK and is an important milestone for monitoring industry activity. I am disappointed that there has been no public scrutiny of the results thus far.

3.2.6 The Independent Review of the Modern Slavery Act⁷² set out the need for a central government registry which would provide a tool for NGOs, academics, businesses and the general public to better understand how companies are responding to the legislation. In June 2019 Prime Minister Theresa May publicly announced that a registry would be created.⁷³ The Home Office is testing and building the service during 2020, but work is progressing more slowly than I would like.

3.2.7 Section 54 of the Modern Slavery Act is important because it underlines the importance of business participation in tackling modern slavery and labour exploitation in the production of goods and services. However, simply asking companies to meet minimum legal requirements is only a basic step towards combatting this pernicious criminal activity.

3.2.8 Even for those organisations producing compliant statements, a disappointingly high proportion are of poor quality. This was acknowledged in the government's response to the Independent Review of the Modern Slavery Act, which states "many organisations have published poor quality statements which contain little or no evidence of the steps they have taken to prevent modern slavery and human trafficking in their operations and supply chains."⁷⁴ Further, many businesses failed to demonstrate that policies were matched by action. In November 2019, analysis of 71 hotel companies by the Walk Free Initiative, the Business & Human Rights Resource Centre, WikiRate and the Australian National University⁷⁵ found that only 25% of statements met minimum requirements, while no statements could be found for seven

⁶⁸ Home Office (2018), '[Home Office tells business: open up on modern slavery or face further action](#)'.

⁶⁹ Home Office (2019), '[How the Government is tackling modern slavery](#)'

⁷⁰ See Appendix E.

⁷¹ Home Office (2020), '[Modern slavery reporting during the coronavirus \(COVID-19\) pandemic](#)'.

⁷² Frank Field MP, Maria Miller MP and Baroness Butler-Sloss (2019), '[Independent Review of the Modern Slavery Act 2015: Final Report](#)'.

⁷³ Home Office (2019), '[PM speech at ILO centenary conference: 11 June 2019](#)'.

⁷⁴ Home Office (2019), '[Government response to the independent review of the Modern Slavery Act](#)'.

⁷⁵ Minderoo's Walk Free Initiative, WikiRate, Business & Human Rights Resource Centre and Australian National University (2019), '[Beyond Compliance in the Hotel Sector: A Review of Modern Slavery Act Statements](#)'.

companies. Very few organisations set out more than basic compliance activities, with 76% failing to disclose supply chain information and 35% not describing their due diligence processes.

3.2.9 The Independent Review of the Modern Slavery Act recommended that Section 54 legislation should be strengthened, requiring organisations to report against the six areas set out in the Statutory Guidance and to remove the ability for an organisation to state that they have taken “no steps” to address their modern slavery risks. The Home Office launched a consultation on the potential impact of this and other proposed changes to legislation.⁷⁶ The consultation closed in September 2019 but the results have yet to be published.⁷⁷ The continuing levels of poor compliance illustrate how important it is that action is taken to both strengthen the legislation and to increase monitoring.

Harnessing the power of the financial community

3.3.1 The investment and banking community has considerable influence over the private sector and can do more to put modern slavery on the corporate agenda. There are some encouraging trends. The Financial Reporting Council’s UK Stewardship Code 2020,⁷⁸ which rather than merely promoting the interests of shareholders, requires investors to take a longer term view of the companies into which they are investing and to create long-term value that also brings benefits to the economy, the environment and society. Businesses have been telling me that they have noticed an increase in environmental, social and governance questions at investor events in the past two years.

3.3.2 With the ongoing impact of Covid-19, it is more important than ever that investors continue to apply this pressure, particularly with regard to labour standards and protections. Many existing supply chain weaknesses are being exacerbated by the pandemic and the UN has voiced concerns that Covid-19 may undo much of the progress made towards the 2030 Agenda for Sustainable Development and the Sustainable Development Goals.⁷⁹

3.3.3 My office supported an investor event run by the UN-supported Principles of Responsible Investment in February.⁸⁰ I am also on the board of the Find it, Fix it, Prevent it initiative, a collaboration of investors, NGOs and academics led by the Churches, Charities and Local Authorities (CCLA) Investment Management Limited. The CCLA is engaging with selected companies over several months, benchmarking their progress and policies on tackling forced labour and modern slavery.

3.3.4 As modern slavery is often intertwined with financial crimes such as money laundering and fraud, banks are an essential link in detecting illegal financial flows of the criminals who profit from this area. I welcome initiatives that align with international best practice in the banking sector, such as set out by the Lichtenstein Initiative⁸¹. This year I am supporting a research and awareness-raising project carried out by financial crime consultancy Themis and the

⁷⁶ Home Office (2019), [‘Transparency in supply chains’](#).

⁷⁷ The Home Office has committed to publishing this in the summer of 2020.

⁷⁸ The [UK Stewardship Code 2020](#) is an update to the 2012 edition of the Code and took effect from January 2020.

⁷⁹ UN Development Programme, Business and Human Rights Asia Pacific Team (2020): [‘Human Rights Due Diligence and Covid-19: a rapid self-assessment for business’](#).

⁸⁰ [Finance Against Modern Slavery and Human Trafficking](#), panel at the PRI Forum held on 12 February 2020.

⁸¹ [The Lichtenstein Initiative for a Financial Sector Commission on Modern Slavery and Human Trafficking](#).

TRIBE Freedom Foundation.⁸² The project is engaging with a broad range of financial institutions to raise awareness, gauge the level of current activity, and work collectively on better solutions. One of the participants, Red Compass, has created algorithms for more than 160 red flag indicators of modern slavery and human trafficking. These algorithms are open source and free for any organisation to apply to its financial data. Such collaboration will be essential if we are to make meaningful progress.

Operation Fort

3.4.1 This year, my office has been reviewing Operation Fort, the UK's largest modern slavery case, to understand how an OCG was able to infiltrate the supply chains of major retailers and DIY stores. The Polish OCG behind Operation Fort operated for several years, before and after the passing of the Modern Slavery Act. Police believe there could have been as many as 400 victims. During the course of this research I met with major retailers and suppliers impacted by Operation Fort to better understand their risks and challenges in detecting and preventing this complex crime. I also read their modern slavery statements. I spoke at an industry-led conference at G's Fresh in January which brought together retailers and suppliers to discuss best practice in combatting modern slavery and human trafficking in the agriculture and food production sectors. The conference sparked a new initiative, led by G's Fresh and Marks and Spencer, to pilot intelligence sharing between retailers, suppliers and NGOs. This is a very positive step.

3.4.2 I have seen examples of retailers using data analytics to monitor their own operations and supply chains against a changing pattern of global risk. For example, Sainsbury's is using a modern slavery risk assessment tool developed in partnership with PricewaterhouseCoopers and the human rights consultancy Ergon. Other organisations are working with Stop the Traffik's Analysis Hub to assess risk in their global supply chains.

3.4.3 I found organisations at different stages of maturity. Some are proactively investigating risk and taking measures to safeguard the workforce while others are relying heavily on setting policies. I set out my observations on current activity and best practice in my review of Operation Fort which was published in June.⁸³

3.4.4 Operation Fort once again underlines the critical role that the banking sector should play in sharing intelligence. The OCG used at least seven banks to launder money, creating a pattern of suspicious activity that lasted for several years. Yet no financial institution raised the alert until after they were contacted by the police team investigating the crime.

Encouraging the role of the public sector

3.5.1 Central government spends £50bn a year on third-party goods and services,⁸⁴ with the wider public sector accounting for an additional £200bn.⁸⁵ Campaigners have long been calling for Section 54 to be extended to the public sector, arguing the powerful influence that this could have on public frameworks and procurement teams. The government has consulted on this proposal, but the results have yet to be published.⁸⁶

⁸² [Preventing Modern Slavery & Human Trafficking in the Financial Sector](#).

⁸³ IASC (2020), 'Operation Fort - What businesses should learn from the UK's largest anti-slavery prosecution'.

⁸⁴ HM Treasury (2020), '[Budget 2020](#)'.

⁸⁵ Field et al. (2019), 'Independent Review of the Modern Slavery Act 2015: Final Report'.

⁸⁶ The Home Office has committed to publishing this in the summer of 2020.

3.5.2 However, I am encouraged to see the government leading by example. In March 2020 it became the first government in the world to publish a modern slavery statement.⁸⁷ The statement assesses the risk of modern slavery across central government procurement, identifying three major risk areas of construction, ICT hardware and electronics, and services such as cleaning and catering. My office supported the development of the statement and I have been engaging with the Cabinet Office to ensure the highest levels of government buy-in. I was pleased to see that the statement was signed and endorsed by the prime minister.

3.5.3 I have been supporting the government's efforts to engage with its supply chains on modern slavery issues. In February I spoke at a roundtable of 34 strategic government suppliers, organised by the Cabinet Office, on the need for businesses to be proactive in safeguarding workers. I have also met with the Crown Commercial Service and the Cabinet Office officials responsible for procurement strategy to discuss progress.

3.5.4 Even though Section 54 does not yet apply to public bodies, there are many examples of the voluntary uptake of reporting in the sector. According to the LGA, 132 local authorities have written statements, 62 of which have budgets that fall below the £36m reporting threshold.⁸⁸ A further 28 councils have signed up to the Co-op's Modern Slavery Charter. My office will be engaging with the LGA and councils to better understand the quality of reporting and will be looking at best practice over the coming months. My office has also been engaging with the National Police Chiefs Council, the MSOIC Unit and the Home Office on producing guidance that will support a common and consistent approach across all forces.

3.5.5 The Home Office has been refining its modern slavery assessment tool to help public sector suppliers identify and manage risk in their supply chains. To date, more than 1,000 suppliers have completed the assessment, with 600 participating voluntarily. This tool could yield important trends on company understanding and engagement. I will continue to engage with the Home Office on its findings and on other procurement guidance, training and tools. I will also be tracking the government's activity to embed social value into public procurement.

Labour market regulation

3.6.1 The Director of Labour Market Enforcement's annual strategy for 2019 to 20⁸⁹ set out the breadth of compliance challenges in the diagram overleaf.

⁸⁷ Home Office (2020), '[UK government modern slavery statement](#)'.

⁸⁸ LGA, '[Modern slavery in supply chains](#)'.

⁸⁹ Director of Labour Market Enforcement (2019), '[United Kingdom Labour Market Enforcement Strategy 2019 to 20](#)'.

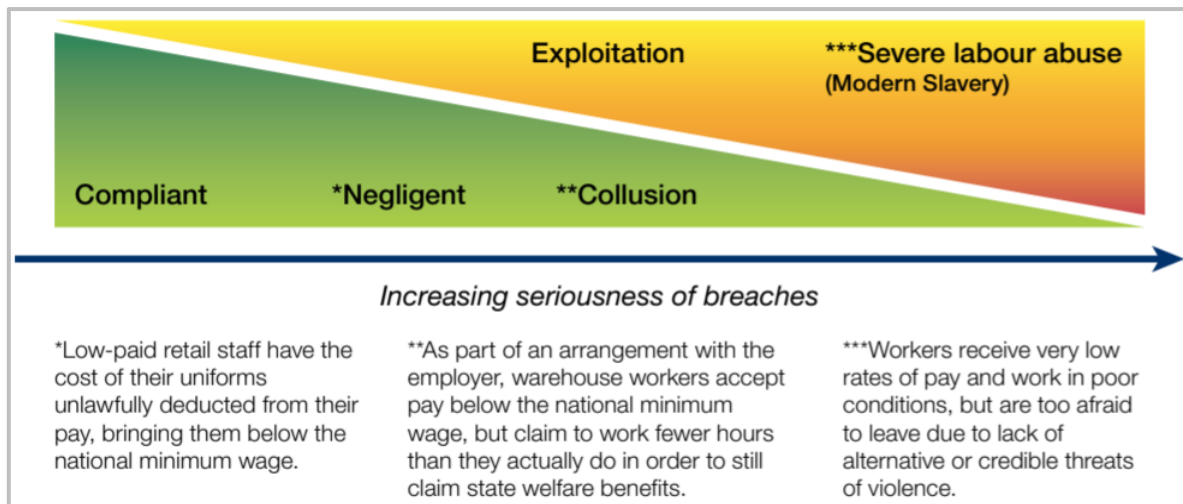


Figure 3: DLME compliance spectrum⁹⁰

3.6.2 I am persuaded that a failure to address non-compliance issues such as failing to pay minimum wage or holiday pay creates a grey economy in which exploitation can thrive. HMRC’s minimum wage team, the Employment Agency Standards Inspectorate and the Gangmasters and Labour Abuse Authority (GLAA) all have an important role to play in enforcing labour market regulation and therefore reducing the opportunities for modern slavery.

3.6.3 I have developed the relationship with the GLAA over the past year and am impressed by their level of operational activity despite limited resources. In March 2020 they had 123 live enforcement cases, 52% of which had indicators of modern slavery. In the financial year 2019/2020 they identified 15,186 potential victims of labour exploitation, issued 23 warnings and 43 enforcement notices, and secured eight convictions.⁹¹ In my strategic plan I set out my ambition to increase joint activity with the GLAA on prevention and enforcement and have secured a six month secondee from the Security Industry Authority (SIA) who is developing proposals for deeper engagement between my office, the GLAA and the SIA.

3.6.4 The government is committed to bringing all three enforcement bodies into a single enforcement body, intended to drive up labour standards and compliance across all sectors. My office has been attending consultation meetings and I will continue to monitor developments. I am also persuaded that the licensing of labour providers should be extended to a wider range of industries which are seen as high risk in order to reduce exploitation. However it is vital that any such extension is supported by additional resources to ensure that licensing is a robust process which demands high standards.

Raising public awareness

3.7.1 While there is growing understanding of the nature of forced labour, research on public attitudes suggests that a large proportion of the population still believes that modern slavery is a problem that happens outside the UK. Many people are surprised to learn of cases of modern slavery and human trafficking in their local area.⁹²

⁹⁰ Ibid.

⁹¹ Gangmasters and Labour Abuse Authority (2020), [‘May 2020 Partnership Bulletin’](#).

⁹² Jen Birks and Alison Gardner (2019), [‘Introducing the Slave Next Door’](#), *Anti Trafficking Review* 13.

3.7.2 A YouGov poll by the Institution of Occupational Safety and Health⁹³ found that 63% of adults were concerned that modern slavery might be involved in the products and services they use or might use in the future, and 84% believed that there should be national awareness campaigns in the UK on tackling modern slavery. Some NGOs are using technology to mobilise this appetite for change. I was encouraged to see that the report 'Beyond Compliance in the Hotel Sector: A Review of Modern Slavery Act Statements' by Walk Free et al. used non-expert volunteers from the WikiRate community to rate modern slavery statements.⁹⁴

3.7.3 Over the past year I have spoken at many events to raise the profile of modern slavery in this country and abroad. Business-focused events have included the launch of the Sancroft-Tussell report 'Eliminating Modern Slavery in Public Procurement'.⁹⁵ I also participated on a panel for The Telegraph's Responsible Fashion Forum, and spoke about modern slavery and human trafficking at the Themis Financial Crime Breakfast Club last July.⁹⁶ In March, I presented a lecture for the Annual Commonwealth Day Westminster Seminar,⁹⁷ urging us all to become more responsible consumers, raising concerns and exerting public pressure about the real cost of products.

3.7.4 I have supported several awareness-raising campaigns over the past year including many launched during anti-slavery week in 2019 such as TSA's #WeAreNotForSale campaign, The Clewer Initiative's #LetsTalk campaign on homelessness and modern slavery and Unseen's #UnseenStories. I also took part in the TRIBE Freedom Foundation's Run for Love event which raised money for victims of modern slavery and human trafficking.⁹⁸

3.7.5 Many of my media interviews have touched on the tragic incident of 39 Vietnamese people dying in the back of a refrigerated articulated lorry in Grays in Essex last October.⁹⁹ This complex case illustrates the intertwined nature of people smuggling and potential links to trafficking. Over the past year, my office has also experienced a strong media appetite for interviewing victims. I am a signatory to the Freedom United pledge My Story, My Dignity¹⁰⁰ and my office promotes this in media engagement and on my website. Whilst I recognise the impact of a human story, I encourage media interest that seeks to represent victims and survivors with dignity and agency.

Preventing victimisation

3.8.1 Ultimately, preventing victimisation requires a coordinated international response. The Independent Review of the Modern Slavery Act recommended the creation of an international role to represent the government's modern slavery agenda overseas.¹⁰¹ In October 2019 the

⁹³ IOSH (2019), '[Tackling Modern Slavery Together, the roles of governments, professionals and the public](#)'.

⁹⁴ Minderoo's Walk Free Initiative et al. (2019), 'Beyond Compliance in the Hotel Sector: A Review of Modern Slavery Act Statements'.

⁹⁵ '[UK urged to 'lead by example' on slavery as top state suppliers flout the law](#)', Thomson Reuters Foundation (20 May 2019).

⁹⁶ '[Slavery reporting penalties 'too light', says commissioner](#)', Supply Management (29 July 2019).

⁹⁷ IASC (2020), '[IASC Lecture: "Half of the world's victims of slavery live in the Commonwealth: What can be done about it?"](#)'.

⁹⁸ '[Why I took part in TRIBE Run for Love with the TRIBE Freedom Foundation](#)', Evening Standard (17 January 2020).

⁹⁹ '[Dame Sara Thornton: There could be slaves working in your local florist, restaurant or nail bar](#)', The Telegraph (10 November 2019).

¹⁰⁰ Freedom United, '[My Story, My Dignity Pledge](#)'.

¹⁰¹ Home Office (2019), 'Government response to the independent review of the Modern Slavery Act'.

government appointed a Migration and Modern Slavery Envoy, whose role is to advocate for tackling modern slavery globally, helping the UK government to coordinate its efforts with other nations.¹⁰² Whilst my remit is predominantly domestic, I will also contribute to international efforts in line with my role to encourage good practice, particularly in prevention.

3.8.2 I meet regularly with the envoy and have agreed some specific areas in which my role can complement their important work. My focus will primarily be on key countries of origin for the UK. In support of this, I plan to visit Vietnam to find out more about the policies, structures and actors involved in anti-trafficking efforts. I also intend to speak at a pan-Asia summit on modern slavery and human trafficking in Bangkok. Hosted by Border Force, this event seeks to build a network of practitioners dedicated to delivering a coordinated regional response. Whilst the Covid-19 pandemic means international travel isn't currently possible, I will fulfil these commitments as and when possible.

¹⁰² [Jennifer Townson is the Migration and Modern Slavery Envoy.](#)

Priority 4: Getting value from research and innovation

4.1.1 Since my appointment I have been encouraged by the substantial amount of research taking place and the passion academia, civil society and business have for better understanding modern slavery. I am also impressed with collaborative efforts to explore how technology can be used to facilitate information sharing and pool collective understanding. My focus has been, and will remain, on bridging the gap between research, policy and practice. It is crucial that these efforts address the key issues faced by practitioners and policy makers. Equally, decision makers must be able and willing to ground their decisions in high quality evidence.

Defining the scale of the problem

4.2.1 By its very nature, modern slavery is a hidden crime. Accurately assessing prevalence is therefore extremely challenging and has been the subject of much debate. Previous attempts to quantify the number of victims using different methodologies have resulted in wildly varying estimates. Using a multiple systems estimation approach, the then Home Office Chief Scientific Adviser, Sir Bernard Silverman, estimated that there were 10,000 to 13,000 victims in the UK in 2013.¹⁰³ The Walk Free Foundation subsequently used a combined methodological approach, including the use of surveys and individual and country-level risk factors in the 2018 Global Slavery Index. This provided an estimate of 136,000 victims in the UK.¹⁰⁴ In the absence of more recent estimates, both figures are still widely quoted.

4.2.2 Quantifying modern slavery continues to be an important issue given its potential to influence not only policy, but also public perceptions. There is a continued appetite among policy makers, practitioners and the media for a current prevalence figure. This is met with reluctance and caution on the part of academics and statisticians. Nevertheless, I am encouraged by recent discussions on the matter. In March 2020 the Office for National Statistics (ONS) published an article that explores the issue of measuring prevalence but does not attempt to directly assess prevalence. The ONS has, instead, brought together different data sources to understand the nature of the crime and potential demand on support services. In doing so, the ONS has acknowledged that this is only part of the story, as many cases are hidden and unreported.¹⁰⁵ In addition, Sir Bernard Silverman recently revisited the use of multiple systems analysis for the quantification of modern slavery.¹⁰⁶ I welcome these recent articles and accompanying debate on the matter, but we need to go further than this. Given the important role prevalence estimates play in directing policy and influencing attitudes, we need more accurate figures that reflect the current scale of the problem.

Developing strategic partnerships

4.3.1 My office has limited ability to undertake or commission research and so collaboration is vitally important in this area. In May 2019 I submitted a business case to the Home Office for the 2019 Spending Review. This included the case for a research budget that would enable me to commission research, however, I have received no additional funding. Since my appointment I have therefore worked with a range of organisations to support and encourage research that is

¹⁰³ Home Office (2014), [‘Modern Slavery: an application of multiple systems estimation’](#).

¹⁰⁴ Global Slavery Index (2018), [‘More than 136,000 people are living in modern slavery in the United Kingdom’](#).

¹⁰⁵ Office for National Statistics (2020), [‘Modern slavery in the UK: March 2020’](#).

¹⁰⁶ Bernard Silverman (2020), [‘Multiple-systems analysis for the quantification of modern slavery: classical and Bayesian approaches’](#), *Journal of the Royal Statistical Society: Series A (Statistics in Society)*.

policy and practice relevant. In addition, the Policy and Evidence Centre for Modern Slavery and Human Rights (Modern Slavery PEC) affords me the opportunity to communicate research needs and highlight evidence gaps. I look forward to further building on these partnerships and developing new relationships in the coming year.

4.3.2 One of my early priorities has been to understand what impact research on modern slavery has already had, focusing in the first instance on survivor support. To do so, I have partnered with the UK Research and Innovation Partnership for Conflict, Crime and Security Research (PaCCS). Through PaCCS I have hosted a researcher who has examined the breadth of academic research on survivor support, and the extent to which it has informed policies and practice throughout the UK. The aim of the review and its recommendations is two-fold: ensuring that academics create useable research and encouraging “evidence users” to engage with academic research and use it to inform their survivor-facing policies and practices.¹⁰⁷

4.3.3 Engagement with academics, policy makers and practitioners has been crucial throughout this project. My office encouraged and facilitated early discussions between the researcher and a range of key stakeholders. A call for research invited interested parties to share academic research that they had either consulted or authored, and to comment on the extent to which they believe it has influenced policy and practice. This received 32 responses, predominantly from researchers and practitioners in the sector and informed a 97-item literature review. Further to this, the review is supported by correspondence with 55 individuals from across England, Northern Ireland, Scotland and Wales.

4.3.4 I am encouraged by emerging research themes this project has identified. Whilst there is a substantial amount of academic research on support for survivors of modern slavery, this research is not always informing policy and practice or having an impact on the effectiveness of survivor support. In order for research to translate to impact more consistently, the resulting review called for researchers and stakeholders to cultivate a culture of collaboration, understanding and respect. The review also identified the need for a strategic infrastructure that could both consolidate knowledge and facilitate this translation of research into impact.

4.3.5 I have supported dissemination of the review with three separate events. On 30 June I partnered with the APPG on Human Trafficking and Modern Slavery to hold a virtual roundtable with parliamentarians. On the release date, a larger virtual event was held with a targeted group of researchers, policy makers and practitioners drawn from contributors to the call for evidence, policy makers and government officials managing current victim policy, and practitioners working on the ground to support victims and survivors of modern slavery. Finally, a virtual workshop was held with members of the Home Office’s Modern Slavery Unit, Home Office Analysis and Insight and the Foreign and Commonwealth Office to discuss the review’s research findings, themes and recommendations.

4.3.6 I have continued to support important work undertaken by the University of Nottingham’s Rights Lab. Quarterly meetings provide an opportunity for my office to understand current and forthcoming research. These meetings take a thematic approach and involve the respective policy leads from my office to help ensure research is relevant and aligned with issues experienced by the sector. In addition to formal support for research bids, my office has inputted into projects such as an update on the 2017 IASC and Rights Lab research report on UK anti-slavery partnerships ‘Collaborating for Freedom’, for which I have written the foreword.

¹⁰⁷ IASC and PaCCS (2020): [‘Preparing for Impact - How we can overcome barriers and cultivate a culture of collaboration, understanding, and respect to achieve impact on survivor support’](#).

4.3.7 I am also supporting work being undertaken by Royal Holloway University on climate policy, emissions and labour rights that builds on the blood bricks project supported by the previous Independent Anti-Slavery Commissioner. This work connects climate policy and key humanitarian and socio-economic issues, including modern slavery, and I am pleased that it has been recommended for funding. I intend for my office to play an active role in such projects, including attendance of advisory board meetings, feedback on research outputs and participation in workshops. On completion of the project my office will also co-host a multi-disciplinary workshop with the research team to discuss the human and environmental impact of UK imports.

4.3.8 I have visited the Centre for the Study of International Slavery, a partnership between the University of Liverpool and National Museums Liverpool, on two occasions. I have met Dr Richard Benjamin, Head of the International Slavery Museum, to hear about its mission for people to hear about the “untold stories” of enslaved people historically and today and their plans for expansion. Such efforts provide an important opportunity to develop public awareness of these issues. I was pleased to contribute to a short video for a National Lottery Heritage Fund bid to support the museum’s redevelopment. My office is also supporting the museum in their curation of exhibitions on contemporary forms of slavery.

4.3.9 In addition to formal collaboration, I have supported research in other ways. For example, my office attends steering group meetings for a University of Manchester research project on modern slavery perpetrators. My team and I have undertaken interviews to inform research on a broad range of issues including statutory defence and the effects and impact of supply chain legislation. I have also spoken at a number of research focused events, including the Rosmini Centre Conference 2019¹⁰⁸ on modern slavery and the impact of migration and a University of Sheffield conference on the role of faith-based organisations in anti-trafficking.¹⁰⁹

4.3.10 The Modern Slavery PEC, announced in July 2019, is a key component of the modern slavery research landscape. It aims to create and deliver against a dynamic and agile research agenda on modern slavery that responds to and informs the priorities of policy stakeholders and research users.¹¹⁰ I am an active member of the Centre’s Advisory Group, which meets regularly to provide advice and guidance. My office has also contributed to the research call on victim and survivor recovery and support, as well as the Centre’s rapid research response to Covid-19. It is essential that the Centre focuses relentlessly on producing policy and practice relevant research that addresses the challenges faced by the sector. I very much support the four broad areas on which the Centre has proposed to focus: victim and survivor support and recovery; legal enforcement measures; prevention; and business and supply chains. These align with my strategic priorities and I welcome research to improve the evidence base. Beyond the commitments set out in my strategic plan, I have also started to explore how evidence based practices could be applied to modern slavery and enhance the existing research landscape. I have met with experts in the field, including those from the Behavioural Insights Team, What Works Network, LSE Centre for Economic Performance, Cambridge Institute of Criminology and the Society of Evidence Based Policing.

4.3.11 To facilitate development in this area, I plan to convene a roundtable later in the year that will bring together these experts and members of the modern slavery research community.

¹⁰⁸ The Rosmini Centre commissioned academics to undertake two research projects on the Fenlands. The first, led by Gary Craig, is an [action-research study on the scope of modern slavery in the Fenland area](#). The second, led by Margaret Greenfields, focuses on the [impact of migration in the Fenland area](#).

¹⁰⁹ The Universities of Sheffield and Leeds have undertaken a three-year ESRC-funded research project on faith responses to modern slavery. The [initial findings report was launched in January 2020](#).

¹¹⁰ [Modern Slavery PEC](#).

Looking further ahead, I have also proposed to hold a conference at Cumberland Lodge, an educational foundation which convenes multi-sector conferences, panel debates and retreats. This will take place in November 2021 as part of their 'Youth and the future: Trust and social justice' series, with a focus on research and policy evaluation in respect of child trafficking.

4.3.12 It is also important to consider modern slavery in the context of wider what works and evidence based approaches, particularly in relation to crime and justice. The 2019 Conservative Manifesto commitment to create a National Crime Laboratory¹¹¹ provides an opportunity to build on existing reform in this area such as the What Works Centre for Crime Reduction. As a member of the Expert Advisory Group for the National Crime Laboratory, my priority is ensuring that the future landscape is designed to reflect complex criminality such as modern slavery and that it is alive to the changing nature of threats which we face.

4.3.13 To further support my work in this area, I am sponsoring two members of my office to undertake the University of Cambridge MSt in Applied Criminology and Police Management. This course places a strong emphasis on evidence based policy and practice and will allow my office to undertake research on modern slavery with the support of the Cambridge Institute of Criminology.

Defining research priorities

4.4.1 Modern slavery research priorities must be focused on addressing the real challenges faced by the sector. The Modern Slavery PEC has a unique opportunity to lead a research agenda that does just this. My office is in a position to understand the difficulties faced by law enforcement, business and the third sector and I have been pleased to contribute to the Centre's efforts to respond accordingly. For example, whilst spending time with victims and survivors I have been struck by the key role education and work can play in their recovery. I have also seen the negative impact that long delays in NRM and asylum decision making can have on physical and mental health. This is exacerbated for many who, based on their immigration status, are unable to work whilst awaiting decisions. Future reform must be evidence based and I am keen to undertake an evidence review of the benefits of work and harm caused by not working.

4.4.2 I also want to explore other ways in which the research community can contribute to solving these issues, including through a potential series of "grand challenges" aimed at addressing the most pressing research needs.

4.4.3 The Independent Review of the Modern Slavery Act recommended that I commission research on how consumer attitudes to modern slavery can be influenced.¹¹² With no formal research budget, I am reliant on collaborative efforts to progress such work. My office has met with academics from Royal Holloway University and University of Glasgow who have undertaken work on how consumers understand modern slavery and their role in perpetuating or eradicating it.¹¹³ I am also aware of other research on public perceptions, such as that undertaken by the University of Nottingham Rights Lab.¹¹⁴ We need to better understand the true cost of cheap goods and services, as well as ways to address the systemic and structural drivers of exploitation. This is an area in which the Modern Slavery PEC can contribute, and it should be considered as part of future research calls.

¹¹¹ [Conservatives Manifesto](#) (2019).

¹¹² Field et al. (2019), 'Independent Review of the Modern Slavery Act 2015: Final Report'.

¹¹³ Royal Holloway University, University of Melbourne and University of Glasgow (2018), '[Consuming modern slavery](#)'.

¹¹⁴ Jen Birks and Alison Gardner (2019), 'Introducing the Slave Next Door', *Anti Trafficking Review* 13.

4.4.4 I want to encourage collaborative research and networks for information sharing across the UK. I have met academics from the University of St Andrews and University of Edinburgh, who have formed the consortium for anti-trafficking research in Scotland (CATRiS). The consortium aims to connect researchers and practitioners across disciplines. Such efforts require resource, and I have written in support of this. It is also vital that there are links between this important initiative and the Modern Slavery PEC, which has a UK wide remit. My office has forged a connection between the two and I am pleased that they have already held constructive discussions.

4.4.5 The Independent Review of the Modern Slavery Act also recommended that I have sufficient access to government data to be able to carry out the duty of scrutiny.¹¹⁵ Further to this, my strategic plan references the need for greater transparency in government data. I now have a data sharing agreement in place with the Home Office that facilitates information sharing on both a one off and regular basis, including regular access to data on decision making by the SCA.¹¹⁶

4.4.6 Whilst this data has been useful for internal purposes, I also want to encourage publication of more data on modern slavery. As part of the process for this annual report, my office has reviewed available data for each of my strategic priorities, some of which is included in this publication. My office has also contributed to the recent NRM user survey. Ensuring published data is relevant and user friendly is an important part of the NRM reform programme, and I welcome steps taken by Home Office Analysis and Insight to make improvements. Beyond concerns around the lack of transparency in government data, frustrations have been repeatedly raised about different parts of the picture being held by different organisations. Several organisations have pursued data sharing projects aimed at addressing this issue, one of which is the Traffik Analysis Hub.¹¹⁷ I have visited Stop the Traffik to find out more about this innovative partnership that brings together disparate datasets and maps reporting instances of modern slavery. This promising initiative is in its early stages and I look forward to seeing how it develops. The real value of such projects will be in identifying areas of risk.

4.4.7 I very much support efforts to pool collective understanding of modern slavery, however, such projects have complex governance challenges. With the development of different solutions, the risk of siloed working remains. As part of a pilot for small-scale projects, the Modern Slavery PEC is undertaking research on responsible data flows, data sharing, privacy, security and trust issues. This is a collaboration between experts from The Alan Turing Institute, Bonavero Institute, Open Data Institute and the Modern Slavery Data Group, led by Unseen. I welcome the output of this research that aims to address some of the most challenging issues around data sharing.

Maximising government investment

4.5.1 A relentless focus on what works, and evidence based decision making are also of crucial importance to UK government investment overseas. With a commitment to spend £200m in UK aid to tackle modern slavery,¹¹⁸ substantial investments have recently been made in this area. Whilst international responsibility rests largely with the Migration and Modern Slavery Envoy, I have a keen interest in overseas programming and meet with the responsible departments (the Home Office, the Department for International Development (DFID) and the Foreign and

¹¹⁵ Field et al (2019), 'Independent Review of the Modern Slavery Act 2015: Final Report'.

¹¹⁶ See Appendix B.

¹¹⁷ [Traffik Analysis Hub](#).

¹¹⁸ Home Office (2019), '[Home Office awards millions to help tackle worldwide slavery](#)'.

Commonwealth Office) quarterly to discuss such matters. I have paid particular attention to whether overseas investment is aligned with the changing nature of the threat. Our understanding of the nature of modern slavery is constantly evolving and it is crucial that overseas investment draws on current evidence to reflect this.

4.5.2 Particularly pertinent in this area of research has been the Tackling Slavery, Human Trafficking and Child Labour in Modern Business programme by the British Academy in partnership with DFID. This work aimed to fill evidence gaps, understand what works at scale and support development effective interventions.¹¹⁹ It is vital that the findings of this important work are used to inform future decisions and investments.

4.5.3 The Independent Commission for Aid Impact (ICAI) is currently undertaking a review of the UK's approach to tackling modern slavery through the aid programme. This portfolio is relatively young as most programmes started in 2018. The review will therefore assess how well the responsible departments have assembled an evidence base and developed a relevant portfolio of work to tackle modern slavery.¹²⁰ I have engaged with ICAI Lead Commissioner Sir Hugh Bayley as part of the process, and my office remains in regular contact with the ICAI secretariat. I welcome publication of the review later in the year and hope that the findings help support development of an effective and evidence based portfolio that reflects the true nature of modern slavery.

4.5.4 Looking ahead, my priority internationally will be on countries of origin for victims of trafficking identified in the UK. My office will play a key role in encouraging the critical evaluation of government funded preventative work designed to improve cooperation and the operational response in source countries. It is also becoming increasingly apparent that Covid-19 has created significant new vulnerabilities internationally. I will closely monitor how far the impact of the pandemic has disrupted the response.

¹¹⁹ The British Academy, [‘Tackling Slavery, Human Trafficking and Child Labour in Modern Business’](#).

¹²⁰ Independent Commission for Aid Impact (2020), [‘The UK's approach to tackling modern slavery through the aid programme’](#).

Taking a UK-wide approach

Scotland

5.1.1 I have been to Scotland on four occasions. Very early in my tenure I met the Head of the Judicial Institute Sheriff Duff, attended the Scottish Government's Strategic Oversight Group and met with the responsible assistant chief constable of Police Scotland. In September, I attended the quarterly jurisdiction meeting where I explained my priorities and met with the Cabinet Secretary for Justice Humza Yousaf MSP. In the meeting with the cabinet secretary we discussed a very broad agenda including asset forfeiture in criminal cases, work with the private sector to raise awareness of transparency in supply chains, new arrangements post-Brexit for immigration and the potential impact on trafficking and exploitation, long term outcomes for trafficking survivors, and levels of NRM referrals. Later in September I gave the keynote speech at a Police Scotland partnership conference and again met with Police Scotland colleagues.

5.1.2 On my fourth visit I led a session at the Judicial Institute for Scotland on 'The importance of bringing human traffickers to justice'. I visited the Scottish Crime Campus at Gartcosh and received comprehensive briefings from the operational teams. I was particularly impressed by Operation Synapsis which investigated the sex trafficking and sham marriages of women from Slovakia.¹²¹ The investigation took five years and was greatly assisted by a Joint Intelligence Team with Europol, Eurojust, UK forces and the Slovak Police Force. Four members of an OCG were found guilty in October 2019 and sentenced to imprisonment. Importantly they were also made subject to Trafficking and Exploitation Prevention Orders for five years. I met with the Scottish Law Officers and I raised the issues of compensation and reparation for victims through the court process, the level of prosecutions and discussed whether the Lord Advocate's guidelines on the principle of non-prosecution were working effectively. On this last matter I am pleased to see that the Scottish Government is monitoring this through its strategy and that Migrant Help is looking at cases to identify whether the process is working effectively.

Northern Ireland

5.2.1 I visited Northern Ireland in August and met with a wide range of agencies and presented to the Modern Slavery Engagement Group. I was impressed by the collaborative culture in Northern Ireland and was pleased to support the Northern Ireland Local Government Association handbook to equip council personnel and their partners to identify, signpost and support victims of modern slavery.¹²² Awareness and training provided by Invisible Traffick for schools, social work teams and youth groups looked very promising and I look forward to the independent evaluation. I was particularly interested in the Northern Ireland approach to guardians for child victims of trafficking and met with both the Northern Ireland Commissioner for Children and Young People and members of the Department of Health Children's Services to discuss their distinctive approach. I met the deputy chief constable of the Police Service of Northern Ireland and his operational lead to be briefed on the additional resources that the force had invested in modern slavery and human trafficking. I held meetings with government officials including the Permanent Secretary in the Department of Justice Peter May.

¹²¹ ['I was sold as a slave for £3500... in Scotland: Victim of barbaric human traffickers reveals ordeal'](#), The Sunday Post (13 October 2019).

¹²² Northern Ireland Local Government Association (NILGA) (2020), ['Tackling Modern Slavery: Guidance for Councils'](#).

5.2.2 I visited Northern Ireland again this year with two of my team. I focused my time on meeting victims and visited both Belfast and Lisburn Women's Aid and Migrant Help. I also attended the Organised Crime Task Force and met with the newly returned Minister for Justice Naomi Long. I was impressed by her commitment to tackling modern slavery in Northern Ireland which had been heightened in the minds of ministers and the community by the connection to the Grays incident where the lorry driver was from Northern Ireland. We discussed the benefits of STROs based on evidence from England, Wales and Scotland, the potential impact of Brexit on trafficking over the border and the interventions that had been developed to address the grooming of children by paramilitaries.

Brexit

The impact of Brexit on modern slavery

6.1.1 Since publishing my strategic plan the UK has left the EU and is now in a transition period. At present this is due to last until 31 December 2020, during which the government must prepare for the post-Brexit landscape. My primary concern is that the resultant changes to how people live, work, travel and do business do not increase vulnerability to modern slavery or negatively impact response efforts. The Covid-19 pandemic has only served to increase uncertainty and it is vital that protecting the vulnerable is a central consideration in the development of new legislation and policy.

6.1.2 With the introduction of the Immigration and Social Security Co-ordination (EU Withdrawal) Bill 2020 and an end to free movement, I have paid particularly close attention to the UK's future immigration system. In February 2020, the government announced plans for a new points-based immigration system that will apply to both EEA and non-EEA migrants.¹²³ The new system prioritises highly-skilled workers and will mark a significant change to the entry routes for migrants across a range of sectors. In announcing the new points-based immigration system, I am pleased that the government has reiterated its commitment to “protect individuals from exploitation by criminal traffickers and unscrupulous employers”.¹²⁴ We know that traffickers are quick to adapt and will seek to abuse new arrangements. I have been clear with ministers and government officials that the future immigration system must be stress-tested against this, and that protecting the vulnerable must be at the forefront of the debate.

6.1.3 I will be closely monitoring the impact that these policy changes have on the most insecure industry sectors that utilise a high proportion of migrant labour including agriculture, hospitality and construction. I will continue to engage with stakeholders from the sector to ensure that I remain sighted on the key issues.

Seasonal Workers Pilot

6.2.1 In February 2020, the Home Office announced that the Seasonal Workers Pilot would be expanded¹²⁵ from 2,500 to 10,000 workers this year. It is recognised however that the sector regularly employs an estimated 70,000 seasonal workers,¹²⁶ most of whom are from abroad. I am concerned that using visas to restrict legal routes into the UK for migrant workers in low paid and low-skilled roles could risk a rise in irregular recruitment routes, fraud and deception.

6.2.2 There are ongoing concerns that unscrupulous players could manipulate the Seasonal Workers Pilot, perpetuating labour exploitation.¹²⁷ There is a lack of clarity around visas and processing costs that workers must pay before they come to the UK,¹²⁸ and anecdotal evidence suggests that some recruits have unwittingly paid recruitment fees to sub agents,¹²⁹ leaving them

¹²³ Home Office (2020), [‘The UK’s points based immigration system: Policy statement’](#).

¹²⁴ IASC (2020), [‘IASC reaction: Government announces new UK points-based immigration system’](#).

¹²⁵ Home Office (2020), [‘10,000 workers to boost British farming sector’](#).

¹²⁶ NFU (2020), [‘NFU responds to immigration policy’](#).

¹²⁷ Association of Labour Providers (ALP) (2019), [‘Achieving a successful Seasonal Workers’ Scheme’](#) and ALP (2020), [‘Seasonal Workers’ Scheme - Code of good practice multi-agency worker group - Recommendations for future scheme design’](#).

¹²⁸ Ibid.

¹²⁹ Ibid.

in a position of vulnerability. Additionally, there are concerns that workers are not being made aware that they can change employers, leaving them more open to exploitation. I understand that the Home Office has been evaluating the scheme and I am awaiting the findings.

EU Settlement Scheme

6.3.1 The EU Settlement Scheme (EUSS) is an example of a further significant post-Brexit policy change where a potential impact on modern slavery, including identified victims and vulnerable migrant workers must be recognised. Under this scheme, EU, EEA and Swiss nationals currently living in the UK, or those who will arrive prior to 31 December 2020, are required to apply for pre-settled or settled status to live and work in the UK after 30 June 2021.¹³⁰ As of March 2020, over 3.4 million applications to the scheme have been received¹³¹ and the Home Office maintains that the scheme is working well.

6.3.2 Over recent months, I have reached out to the NGO sector to understand how the scheme is working in practice and whether victims of modern slavery have experienced difficulties in applying to the EUSS. Whilst I have been pleased to hear about examples of flexibility in the system to accommodate the needs of victims of modern slavery, I am concerned that there appears to be a reliance on advocacy support to mitigate the challenges identified within the system. I am aware of several issues affecting victims, including difficulties in making online applications due to a lack of identification documentation, challenges in proving the length of time that a person has been residing in the UK and a lack of clarity about the interaction between the EUSS and discretionary leave to remain.

¹³⁰ Home Office (2019), [‘Apply to the EU Settlement Scheme’](#).

¹³¹ Home Office (2020), [‘EU Settlement Scheme Statistics March 2020’](#).

Communications

7.1.1 My office uses communications to support delivery of my strategic plan, to engage with and share best practice among the broadest range of stakeholders, and to support efforts to raise awareness of modern slavery and human trafficking.

7.1.2 My core messaging as Commissioner is reflected in all communications. This is predicated on my role's statutory independence: to be objective, impartial, evidence based, fair and accurate.

7.1.3 I aim to embed a victim-centered approach within all communications, reflecting individual agency and a diversity of experiences where possible. My office is a signatory to the Freedom United pledge My Story, My Dignity¹³² which calls on media organisations to review their style guides to improve the way that modern slavery and survivor stories are presented in the media.

"The importance Dame Sara places on support for victims and survivor-centred policy approaches cannot be underestimated. We will not secure a future where this extreme exploitation no longer thrives if we are not benefitting from survivors and affected communities' informed leadership. The first step is creating an enabling environment to switch from a focus on basic survival to realising full recovery and rehabilitation through adequate support, security and justice."

Joanna Ewart-James, Executive Director, Freedom United

Media coverage and public events

7.2.1 As Commissioner, I have sought to raise awareness of modern slavery by speaking at events, engaging with a range of media outlets and supporting partners' communications and campaigns which are targeted at both professionals and the public.

7.2.2 Over the past year I have spoken at over 60 conferences, roundtables and events hosted by charities, faith-based organisations, local and national government, businesses and research institutes. These have included the Medaille Trust's annual conference for service providers, a Police Scotland human trafficking event, a conference on the business response to Operation Fort and the Annual Commonwealth Day Westminster Seminar.

7.2.3 Since May 2019, interviews and comments covering my work have been featured in over 150 media features, including broadcast, print and online outlets. A breadth of coverage across local, national, international and trade media has been achieved with interviews, letters and opinion pieces published by The Times, The Sunday Times, the Guardian, The Independent, Evening Standard, BBC News, Daily Mail, The Telegraph and others. Radio coverage has included a piece with Woman's Hour with reporting from inside a safe house and an interview for a Radio 4 documentary 'The Hidden Story of British Slavery'.

¹³² Freedom United, 'My Story, My Dignity Pledge'.

"Survivor Alliance appreciates the Commissioner's direct outreach to our members and the quality of engagement we have had with her and her team. The Commissioner's public comments, requests for evidence, and calls for improvements have reflected some of the key concerns that our UK survivor members face on a daily basis. We look forward to continuing our collaboration with the Commissioner to ensure that survivor-centred policy making becomes a norm."

Minh Dang, Executive Director of Survivor Alliance

Box 1: Reaction to the Essex lorry deaths (October 2019)

There was significant media interest following the tragic discovery of the bodies of 39 Vietnamese people found in a lorry in Grays, Essex in October 2019.

My office released a statement on the morning of the incident and worked with partners in the police, government and experts including Vietnamese diaspora to understand the context and potential links to human trafficking.

Coverage included a full page comment piece in The Times, a letter in The Sunday Times and interviews with The Telegraph, ITV News, BBC 5 Live and the Today Programme.

Messaging on the incident centred on:

- Vulnerable migrants may begin a journey as a smuggled migrant but may become a victim of trafficking (or vice versa) at any point;
- The UK government can take further practical action to combat trafficking including closer cross-Whitehall coordination;
- There must be continued cooperation with European criminal justice agencies post-Brexit;
- Future migration policies should be stress-tested to protect vulnerable migrants.

Policies and procedures

7.3.1 Communications are used to disseminate outputs and improve outcomes by assessing reach and impact. I have an [independent website](#) which is regularly updated with news items and blogs. Social media is used to further share information with the public and the sector.

7.3.2 The website also hosts resources and reports on modern slavery, as well as transparency information including letters sent and received (where permission has been granted) and meeting minutes of the Advisory Panel.

7.3.3 User engagement and media interest is monitored and evaluated regularly. This informs the planning and tailoring of future communications to ensure they reach intended audiences.

7.3.4 Policies regulating how and what is published are available online via a publication scheme, including a policy regarding media engagement and victims of modern slavery:

“We frequently receive media requests to speak with individual victims and survivors of modern slavery. Whilst we recognise the impact of a human story, we encourage media interest which seeks to represent victims and survivors with [dignity and agency](#).

We do not put press or media directly in touch with victims and survivors of modern slavery for safeguarding reasons.”

“Dame Sara is careful to always listen to people who have survived slavery and to learn from the experiences of survivors she meets, together with professionals working to prevent and protect against slavery. This is made clear in her pragmatic and thoughtful approach to the issues she prioritises and her public comments which always come back to the best interest of survivors.”

Kate Roberts, UK and Europe Programme Manager at Anti-Slavery International

Speaking engagements 2019-2020

Date	Event
May 2019	Launch of the ‘Sancroft-Tussell Report: Eliminating Modern Slavery in Public Procurement’
May 2019	National Anti-Trafficking and Modern Slavery Network meeting hosted by Mark Burns-Williamson PCC
June 2019	Meeting with parliamentarians in the APPG on Human Trafficking and Modern Slavery
June 2019	The Telegraph’s Responsible Fashion Forum
June 2019	Bright Future Partners Forum hosted by the Co-op
June 2019	The Passage’s Modern Slavery Conference 2019
June 2019	Implementing Australia’s Modern Slavery Act – Know Your Supply Chain hosted by the Australian Department of Home Affairs (Sydney, Australia)
July 2019	Wales Leadership Group meeting
July 2019	Human Trafficking Foundation Advisory Forum
July 2019	Keynote address at Doughty Street Chambers
July 2019	Themis Financial Crime Breakfast Club on Modern Slavery & Human Trafficking

September 2019	Quarterly Jurisdiction Meeting in Edinburgh
September 2019	Intergovernmental Consultations on Migration, Asylum and Refugees (IGC) Human Trafficking Workshop hosted by the Australian High Commission
September 2019	Launch of 'The Anti-Trafficking Monitoring Group: A Decade of Scrutiny of UK efforts to combat human trafficking'
September 2019	Consultation with Ethical Trading Initiative members
September 2019	Keynote address at Human Trafficking Conference hosted by Police Scotland
September 2019	National Roundtable on Safeguarding Children and Prevention Education hosted by the McCain Institute (Washington, USA)
September 2019	Combatting Human Trafficking Symposium hosted by the McCain Institute (Washington, USA)
September 2019	Tackling Exploitation Conference hosted by Simon Bailey QPM
September 2019	Migration, Integration and Demographic Change session at the 27 th Pontignano Conference (Italy)
September 2019	Ethical Labour roundtable hosted by the British Retail Consortium
October 2019	Royal Air Force (Force Protection Command) Annual Symposium
October 2019	Modern Slavery and Human Trafficking: Shaping Effective Operational Approaches (Cross Sector Operational Workshop) hosted by Justice and Care
October 2019	Inter-Governmental Forum on Combatting Trafficking in Persons in the Middle East hosted by the Bahraini Labour Market Regulatory Authority (Manama, Bahrain)
October 2019	Parliamentary launch of ECPAT UK's 'Stable futures for child victims of trafficking campaign' hosted by Vernon Coaker MP
October 2019	Beulah Anti-Slavery Day Panel
October 2019	Celebration event and art awards hosted by Hestia
October 2019	Human Trafficking & Developments in Jury Charging event hosted by the Judicial Institute for Scotland
November 2019	GLAA board meeting
November 2019	Rosmini Centre Conference 2019 – Modern slavery and the impact of migration
November 2019	Slave-Free Alliance Members' Seminar
November 2019	Cleveland Anti-Slavery Network
November 2019	The Medaille Trust Annual Conference
November 2019	London Modern Slavery Leads meeting
November 2019	Vice-Chancellors' Programme on Developing a Second Strategic Framework at Cumberland Lodge
January 2020	UN Global Compact Network UK Modern Slavery Working Group
January 2020	National Anti-Trafficking and Modern Slavery Network hosted by Mark Burns-Williamson PCC

January 2020	Eastern Region Anti-Slavery Partnership hosted by Unseen and the MSOIC Unit
January 2020	Roundtable discussion on Human Trafficking Prevention hosted by the US Ambassador to the UK Robert Wood Johnson
January 2020	Launch of the book <i>Slaves Among Us</i> by Monique Villa hosted by the Bonavero Institute of Human Rights
January 2020	Rights, dignity and religion conference: Responding to modern slavery hosted by the University of Sheffield
January 2020	Systems Under Pressure: Emergency Response panel hosted by the National Leadership Forum
January 2020	G's Fresh modern slavery conference
February 2020	National MS Partnership Conference - Working Together to Support Survivors of Modern Slavery hosted by Mark Burns-Williamson PCC , Alison Hernandez PCC and the MSOIC Unit
February 2020	National Modern Slavery Police Continuing Professional Development (CPD) Conference hosted by the MSOIC Unit and the College of Policing
February 2020	The Stop Slavery Award Ceremony panel hosted by Thomson Reuters Foundation
February 2020	Voice of Hope charity 5th Anniversary
March 2020	Annual Commonwealth Day Westminster Lecture hosted by the Council for Education in the Commonwealth
March 2020	Modern Slavery and Human Trafficking NGO Conference – Working Together to Maximise Impact and Safeguard Victims hosted by the National Crime Agency and the MSOIC Unit
March 2020	Rotary District Conference - District 1090 in action: Creating a Better World

Appendix A: Budget for the IASC office (financial year 2019/2020)

	£ Budget	£ Expenditure
TOTAL BUDGET	575,000	573,609.87
Pay		510,562.82
Non-pay		63,047.05
Non-pay		
Travel and subsistence		17,852.20
Office supplies and services		3,087.30
Training and recruitment		24,317.80
IT and communications		10,089.11
Other costs and services		7,700.64
Income		
NI		30,000 (contribution to budget and included in total budget)

Appendix B: Data tables

Improving victim care and support

Number of quarterly NRM referrals, 2017/2018 to 2019/2020¹³³

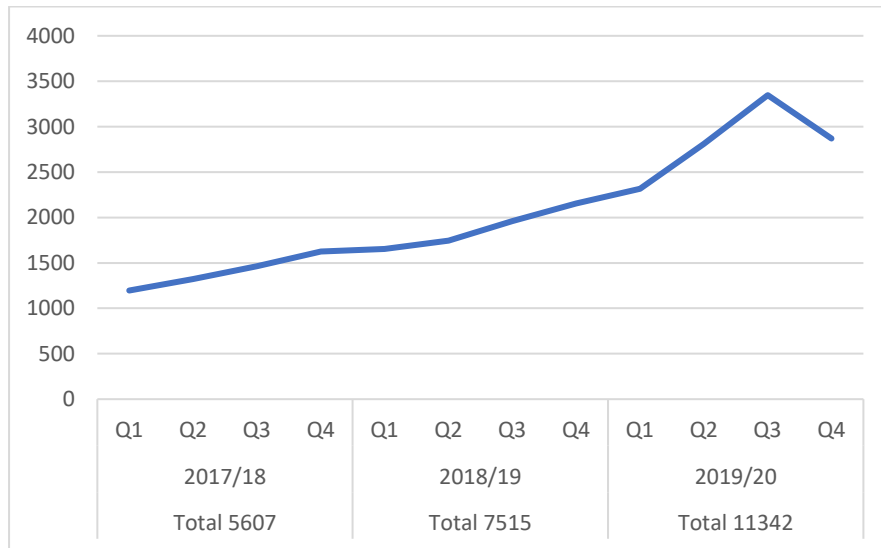


Figure A1

¹³³ This chart is based on the updated total number of NRM referrals per quarter as of June 2020. Values from quarterly bulletins may change as referrals are updated and duplicates are identified. Figures used to create these charts may therefore differ slightly to the most recent data. Available at: <https://www.gov.uk/government/collections/national-referral-mechanism-statistics>.

Number of quarterly NRM referrals by age at time of exploitation, 2017/2018 to 2019/2020¹³⁴

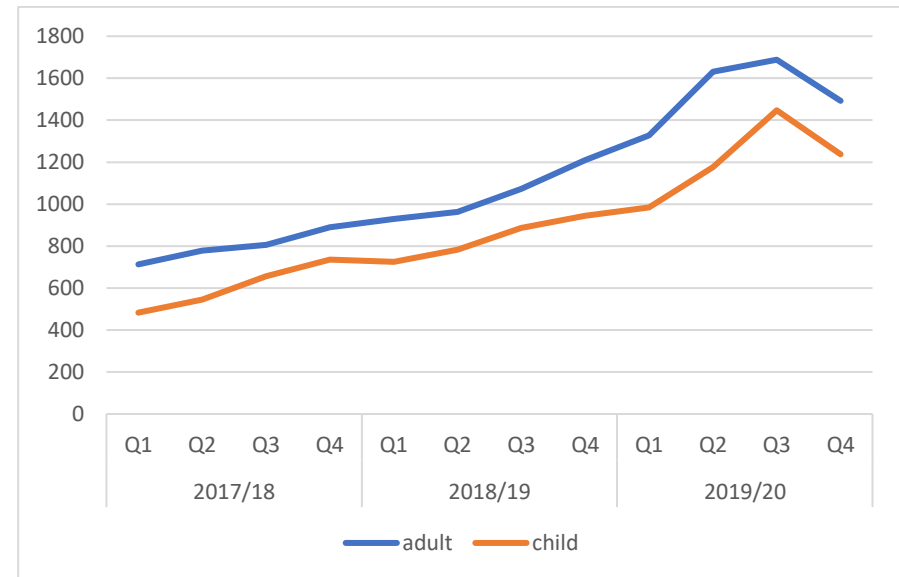


Figure A2

¹³⁴ Data obtained from updated total number of NRM referrals by age at time of exploitation as of June 2020. Referrals where age at time of exploitation is unknown are not recorded.

Top 10 nationalities referred into the NRM 2019/2020¹³⁵

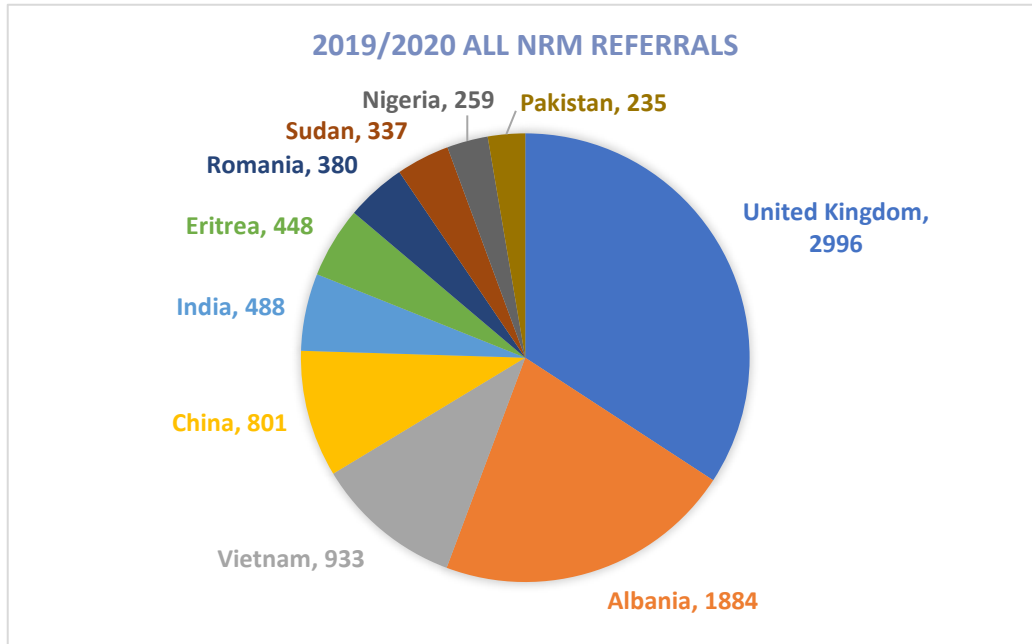


Figure A3

¹³⁵ NRM referrals by nationality and exploitation type. Excludes dual nationalities, introduced from July 2019 data only. Where NRM data has been compiled from

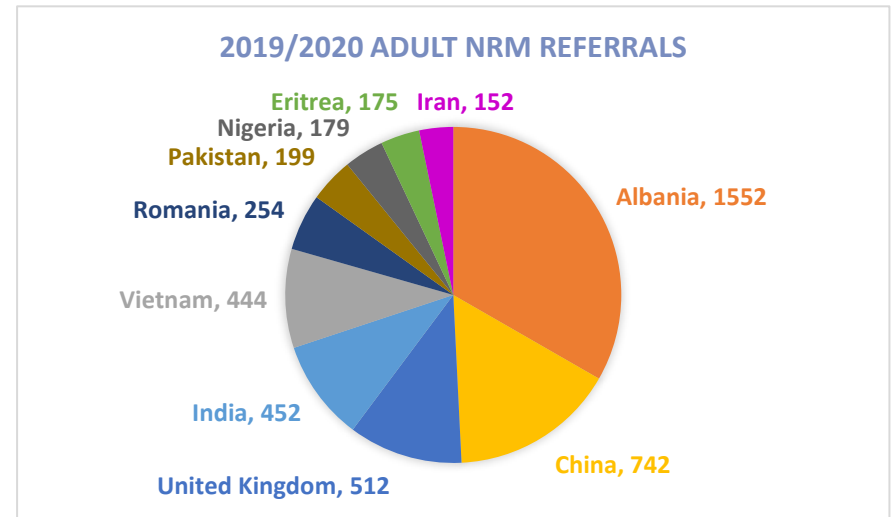
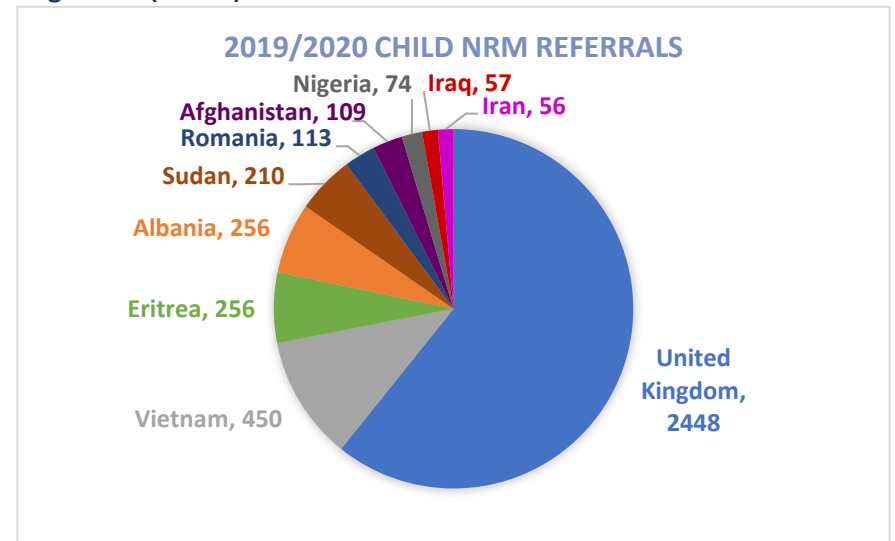


Figure A4 (above)

Figure A5 (below)



published quarterly reports, it does not take account of the small number of duplicate referrals that are identified and updated in the dataset.

Number of NRM referrals by first responder 2017/2018 to 2019/2020¹³⁶

	First responder organisation								
	Home Office Immigration Enforcement (HOIE)	UK Visas and Immigration (UKVI)	Border Force	GLAA	NCA	Local authorities	NGOs	Police	Not recorded
2017/18	93	2081	129	18	9	919	762	1607	-
2018/19	577	2303	162	33	18	1549	797	2086	-
2019/20	2277	2426	258	7	7	2452	888	3020	14

Table A1

Number of Duty to Notify referrals 2017 to 2019¹³⁷

	First responder organisation										
	HOIE	UKVI	Border Force	Home Office (other)	GLAA	NCA	Local authorities	NGOs	Police	Other ¹³⁸	Not recorded
2017	55	370	353	-	59	8	60	25	746	19	-
2018	18	480	230	1	57	18	106	20	755	14	-
2019	46	820	275	7	36	5	143	31	849	61	1

Table A2

¹³⁶ Data obtained from quarterly NRM statistical publications. Where NRM data has been compiled from published quarterly reports, it does not take account of the small number of duplicate referrals that are identified and updated in the dataset. Figures used to create these charts may therefore differ slightly to the most recent data and overall totals.

¹³⁷ Data provided by the Home Office. Data cut taken 10 February 2020.

¹³⁸ This includes the NHS and other organisations that are not designated First Responders but that have made referrals.

Reasonable grounds (RG) decisions, 2019¹³⁹

Date of reasonable grounds decision	EEA			Non-EEA		
	Total RG decisions	Negative RG decisions	Positive RG decisions	Total RG decisions	Negative RG decisions	Positive RG decisions
Q1	175	18	157	1903	201	1702
Q2	153	13	140	1983	221	1762
Q3	241	13	228	2483	214	2269
Q4	236	23	213	3126	344	2782
Total	805	67	738	9495	980	8515

Table A3

Conclusive grounds (CG) decisions 2019¹⁴⁰

Date of reasonable grounds decision	EEA			Non-EEA		
	Total CG decisions	Negative CG decisions	Positive CG decisions	Total CG decisions	Negative CG decisions	Positive CG decisions
Q1	184	54	130	1219	251	968
Q2	92	19	73	664	138	526
Q3	20	1	19	578	119	459
Q4	43	0	43	832	122	710
Total	339	74	265	3293	630	2663

Table A4

¹³⁹ Information provided by the Home Office. Data cut taken 10 February 2020.

¹⁴⁰ Information provided by the Home Office. Data cut taken 10 February 2020.

Average number of days to RG and CG decision, for decisions made during each quarter of 2019¹⁴¹

	Mean total days to RG	Median total days to RG	Mean working days to RG	Median working days to RG	Mean total days to CG	Median total days to CG
Q1	11	5	9	5	418	287
Q2	11	6	9	5	407	260
Q3	11	5	9	5	513	499
Q4	15	5	12	4	471	420

Table A5

Number of outstanding RG and CG decisions at the end of each quarter in 2019¹⁴²

	RG	CG
Q1	251	6857
Q2	341	8002
Q3	338	9899
Q4	240	12019

Table A6

¹⁴¹ Information provided by the Home Office. Data cut taken 10 February 2020.

¹⁴² Information provided by the Home Office. Excludes withdrawn/suspended cases. Data cut taken 10 February 2020.

Victims supported in safehouses and outreach support by calendar year, England and Wales

	2017	2018	2019
Safehouses	636	742	915
Outreach support	2384	3171	4247

Table A7

Notes:

Data provided by The Salvation Army.

The support provided is only on last placement in the Victim Care Contract. If an individual moved between accommodation and outreach, only the most recent support would be shown in the table.

The data held on exit destination is of poor quality. It should therefore be used with caution.

Victims' destination upon exit from support in England and Wales, 2019

No. of victims	Exit from service
250	Asylum support accommodation
4	Deceased – N/A
24	Homeless services
1	Hospital in-patient
43	Living with friends / family / partner – EEA (not UK)
12	Living with friends / family / partner – non-EEA country
172	Living with friends / family / partner – UK
35	Mainstream accommodation – LA
133	Withdrawn from support
1	MoRe Project
5	NGO supported accommodation – EEA (not UK)
0	NGO supported accommodation – non-EEA country
24	NGO supported accommodation – UK
1	Non-UK government funded support abroad
5	Prison
14	Private accommodation – EEA (not UK)
3	Private accommodation – non-EEA country
184	Private accommodation – UK
14	Street homeless
35	Supported accommodation – LA
23	Voluntary return – Government funded
3	Voluntary return – La Strada (Poland)
13	Voluntary return – NGO funded
31	Blank
Total	1030

Table A8

Victims' destination upon exit from NRM support in Scotland 2019/2020¹⁴³

Tara - During the period 2019/2020 a total of 72 cases were closed by the TARA Service. 71 cases were referred to the NRM by a variety of First Responders, including TARA, and one woman declined to be referred.

Reasons for case closure

Grants of leave to remain	Repatriations	Missing persons	UK relocation	Client disengagement / declined ongoing support	Alternative / mainstream support
21	3	3	6	16	23

Table A9

Outcomes achieved¹⁴⁴

Increased safety	Community integration	Increased independence	Improved legal understanding
60	48	45	44

Table A10

Migrant Help - 247 individuals exited Migrant Help support during 2019/20

Voluntarily left care	Transferred to asylum support	Never returned contact	Detained	Transferred to other agency	Resettled in the UK	Returned to country of origin	Absconded
99	68	21	18	13	12	10	6

Table A11

Number of individuals who have moved on from NRM support in Northern Ireland 2019/2020¹⁴⁵

- In 2019/20, 76 individuals entered NRM support and 20 of these cases exited the same year.

¹⁴³ Data provided by the Scottish Government. The figures include all individuals who have exited support in 2019/20, regardless of when they entered support.

¹⁴⁴ Provides the outcomes achieved which are used by the service to assess if a case can be closed and reflects individual needs and recovery achievements.

¹⁴⁵ Data provided by the Department of Justice Northern Ireland.

Number of quarterly NRM referrals by exploitation type, 2017/2018 to Q2 2019/2020¹⁴⁶

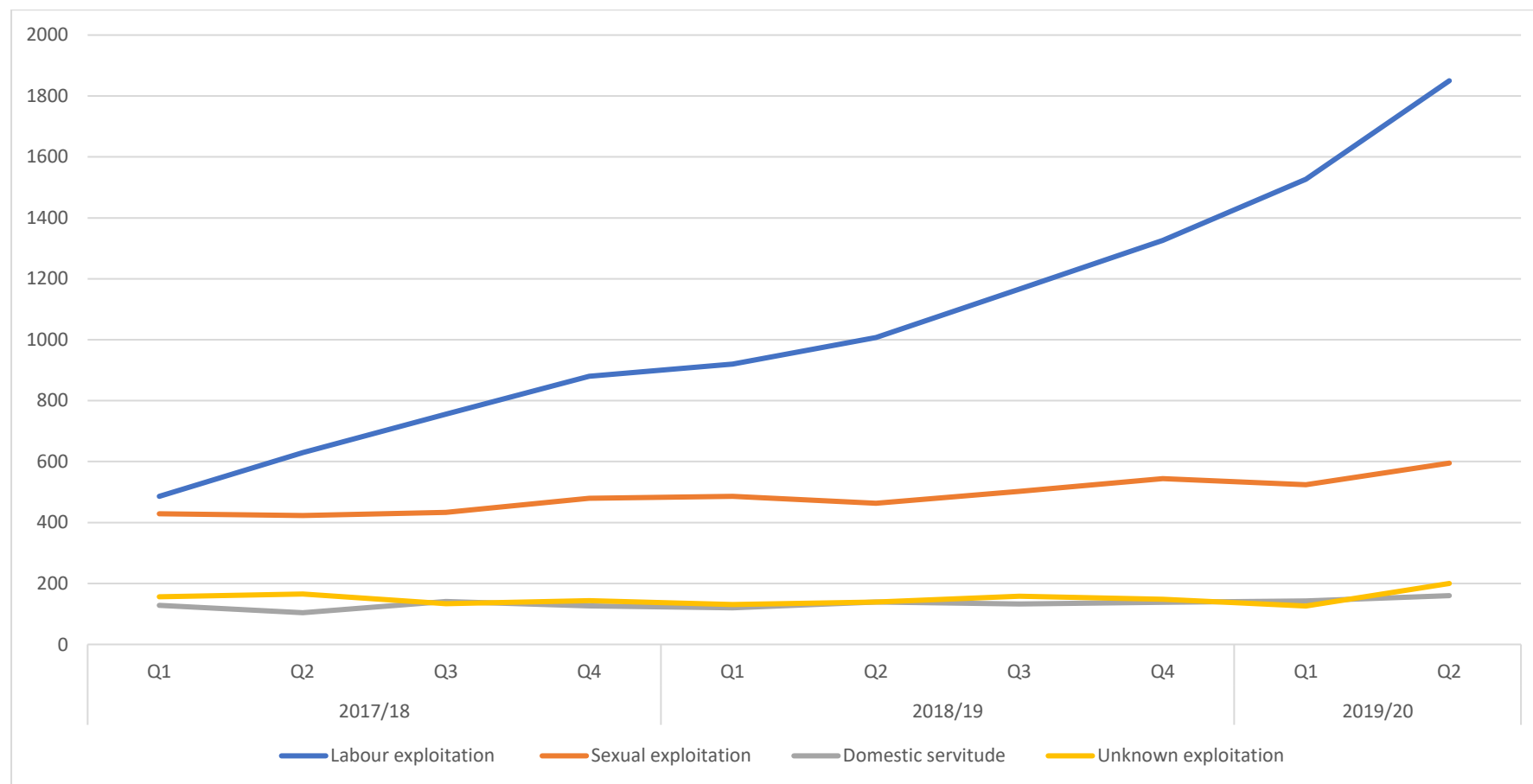


Figure A6

¹⁴⁶ Data in these charts is from quarterly NRM publications. Values from quarterly bulletins may change as referrals are updated and duplicates are identified. Figures used to create this chart may therefore differ slightly to the most recent data. Prior to 1 October 2019, potential victims of modern slavery were recorded as having a single 'primary' exploitation type, grouped into five distinct categories: labour exploitation, sexual exploitation, domestic servitude, unknown exploitation or organ harvesting. Small numbers of referrals for organ trafficking are not shown: 2017/18: 4 referrals; 2018/19: 5; 2019/20 Q1&Q2: 3.

Q3-4 2019/2020 referrals by exploitation type¹⁴⁷

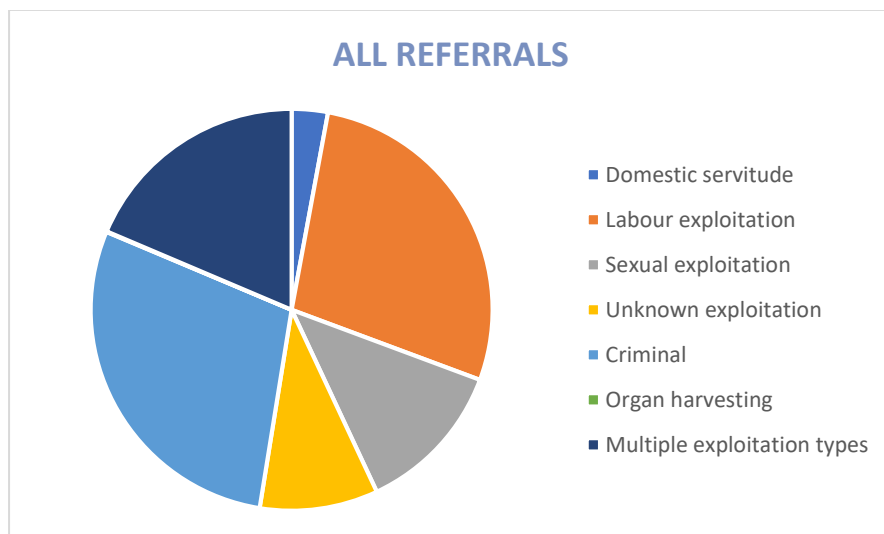


Figure A7

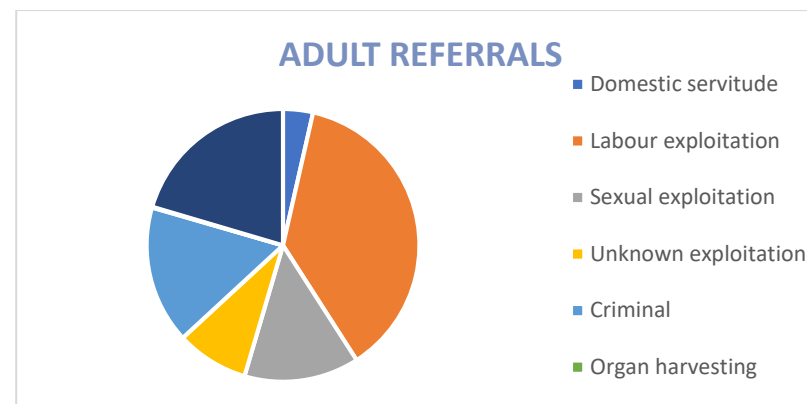


Figure A8

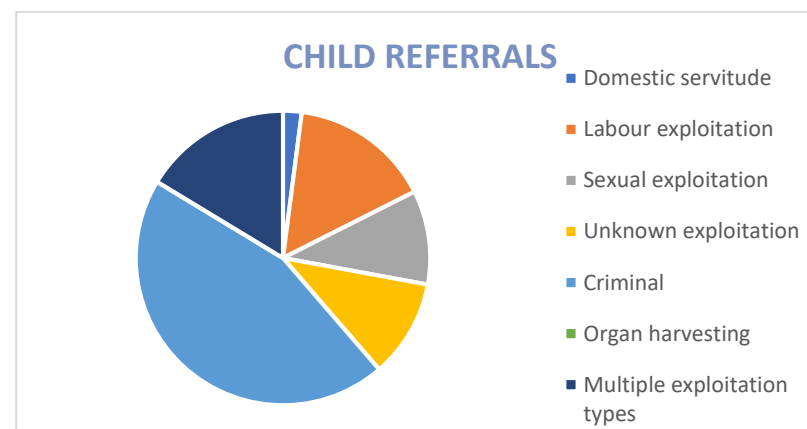


Figure A9

¹⁴⁷ Data in these charts is from quarterly NRM publications. Values from quarterly bulletins may change as referrals are updated and duplicates are identified. Figures used to create this chart may therefore differ slightly to the most recent data. Following changes to the way NRM data is collected, recording of exploitation types has changed. As a result, for referrals received from 1 October 2019, criminal exploitation has been split from labour exploitation. In addition, potential victims can also be recorded as experiencing multiple exploitation types

and, as such, caution should be taken when comparing exploitation type statistics from quarter 3 with previous quarters, as the primary exploitation type is unknown. During Q3-4 2019/20 there were three adult referrals for organ harvesting that are not reflected in these charts. All referrals includes those where age at time of exploitation is not known.

Supporting law enforcement and prosecutions

Live policing operations across the UK¹⁴⁸

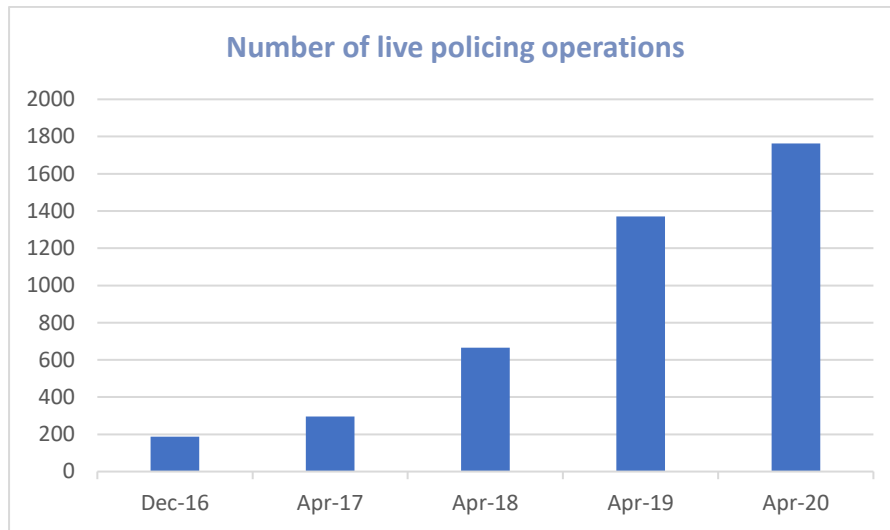


Figure A10

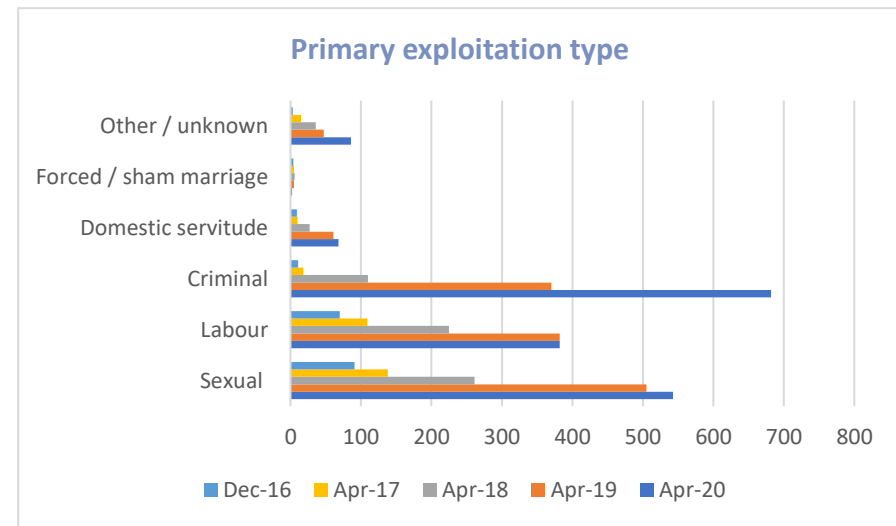


Figure A11

¹⁴⁸ Data provided by the Modern Slavery and Organised Immigration Crime Unit (MSOIC), May 2020. This includes operations being undertaken by police forces across the UK, including PSNI and Police Scotland in December 2016, April 2017,

April 2018, April 2019 and April 2020. This only includes operations that the MSOIC Unit have been made aware of.

Police recorded crime for modern slavery in England and Wales, 2017/2018 to 2019/2020¹⁴⁹

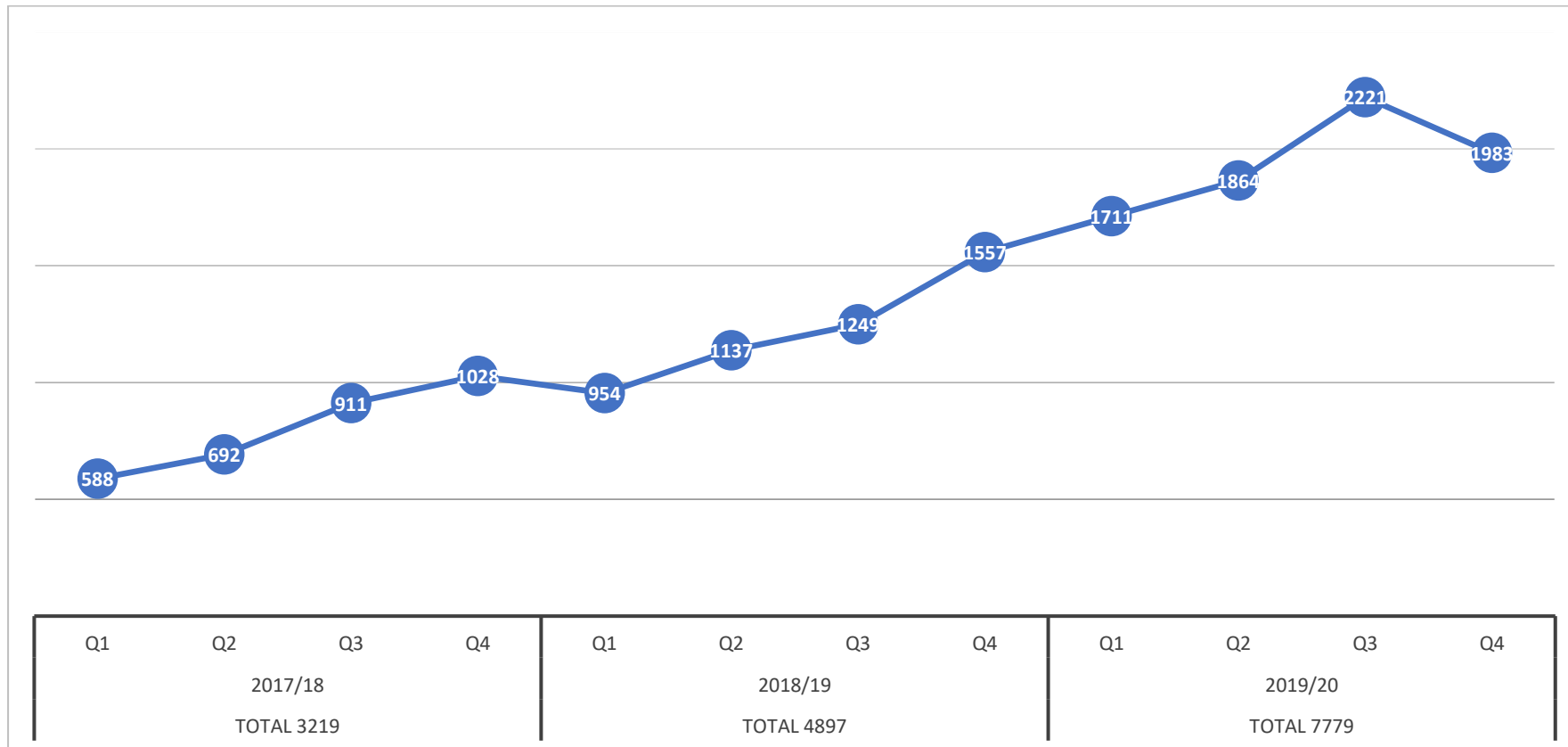


Figure A12

¹⁴⁹ Figures obtained from [published police recorded crime data](#) updated 17 July 2020. Following the implementation of a new IT system in July 2019, Greater Manchester Police has been unable to supply data for the quarter July to December 2019. Figures for this force have therefore been excluded. It is important to note that increases in recorded modern slavery offences reflect improvements in recording practices and general awareness of modern slavery in addition to any actual changes in prevalence.

Police recorded crime for human trafficking and exploitation in Scotland, 2017/2018 to 2018/2019¹⁵⁰

Group	Crime code	2017/18	2018/19
Group 1 (non-sexual violence) other violence	Slavery or forced labour	68	144
Group 1 (non-sexual violence) other violence	Human organ offences	-	2
Group 2 sexual crimes (crimes associated with prostitution)	Immoral traffic	21	31
Group 5 other crimes (crimes against public justice)	Breach of trafficking and exploitation order	-	2
Total		89	179

Table A12

Police recorded crime for human trafficking and exploitation in Northern Ireland, 2017/2018 to 2019/2020¹⁵¹

	2017/18	2018/19	2019/20
Number of recorded crimes for human trafficking and exploitation offences	30	37	41

Table A13

¹⁵⁰ Data provided by the Scottish Government. There are four main crime codes relating to human trafficking and which are spread across three different crime groups. Charges that relate to the Human Trafficking and Exploitation (Scotland) Act are included in all of these four crime codes.

¹⁵¹ Data provided by the Department of Justice Northern Ireland.

Pre-charge receipts and modern slavery flagged prosecutions and convictions, England and Wales¹⁵²

	2017/18	2018/19	2019/20
Pre-charge receipts	293	205	289
Prosecutions	284	322	301
Convictions	185	219	224

Table A14 (above)

Table A15 (below)

Defendants prosecuted for modern slavery offences on a principal offence basis, England and Wales¹⁵³

	2017/18		2018/19		2019/20	
	Prosecuted	Convicted	Prosecuted	Convicted	Prosecuted	Convicted
Slavery, servitude and forced labour	18	10	6	4	2	5
Human trafficking for sexual exploitation	9	6	3	8	0	0
Human trafficking for non-sexual exploitation	0	6	4	1	2	5
Modern Slavery Act 2015	115	19	82	14	67	36
Total (all slavery and trafficking offences)	142	41	95	27	71	46

¹⁵² Management information obtained from published [CPS Violence Against Women and Girls report](#) for 2018/19. 2019/20 data is obtained from [annual data summaries](#).

Pre-charge receipts: The total number of suspects referred by the police to the CPS for a charging decision. The number of **pre-charge receipts, for different crime types, referred by the police** relies on (a) the police identifying and flagging the cases, by suspect, prior to being referred to CPS and (b) CPS administrators identifying and flagging those cases on the CPS Casework Management System, when they are first registered. **Prosecution outcomes data:** CPS outcomes are recorded on a defendant basis. CPS maintains a central record of prosecution outcomes with reference to a number of case monitoring flags, including modern slavery. Although charges specifically related to a flag may be considered at the time of the pre-charge decision, the defendant may in fact be charged with another offence. Similarly, there may be cases where a person is convicted of a lesser offence than that with which they were proceeded against.

¹⁵³ These data are an additional breakdown of data already published by the MoJ as part of their quarterly Criminal Justice Statistics. They have been provided to enable monitoring of trends in criminal justice outcomes for specific slavery offences. Every effort is made to ensure that the figures presented are accurate and complete. However, it is important to note that these data have been extracted from large administrative data systems generated by the courts and police forces. As a consequence, care should be taken to ensure data collection processes and their inevitable limitations are taken into account when those data are used. (1) The figures given in this table relate to defendants for whom these offences were the principal offences for which they were dealt with. When a defendant has been found guilty of two or more offences it is the offence for which the heaviest penalty is imposed. There will be other modern slavery prosecutions that are not counted in this data set as defendants may have been prosecuted for a more serious offence. In the last two years, MoJ experimental data shows there have been between two and three times as many prosecutions of modern slavery as a non-principal offence than as a principal offence. Where the same disposal is imposed for two or more offences, the offence selected is the offence for which the statutory maximum penalty is the most severe. (2) A defendant who appears before both magistrates' court and Crown Court may not do so within the same year, meaning for a given year convictions may exceed prosecutions or sentences may not equal convictions. Defendants who appear before both courts may be convicted at the Crown Court for a different offence to that for which they were originally proceeded against at magistrates' court.

Human trafficking prosecutions and convictions, Scotland¹⁵⁴

	2017/2018	2018/2019	2019/2020
Number of persons reported to COPFS	23	15	39
Number of persons prosecuted	13	7	9
Number of persons convicted	3	2	0

Table A16

Human trafficking prosecutions and convictions, Northern Ireland

	2017/2018	2018/2019	2019/2020
Number of persons prosecuted ¹⁵⁵	5	4	0
Number of persons convicted ¹⁵⁶	2	0 ¹⁵⁷	2

Table A17

¹⁵⁴ Data provided by the Scottish Government. All data is provided based on the date on which the initial police report was submitted to COPFS. ‘Prosecuted’ means that the Procurator Fiscal has placed the accused person(s) on petition. This is an initial step which is followed by a period of investigation. It does not necessarily mean that an indictment was served on the accused person(s). Decisions about whether to place a number of people on petition are being considered (particularly in relation to people reported to COPFS in 2019-20). Proceedings in respect of a number of accused persons are ongoing. Accordingly, the data provided in columns 2 and 3 will change as a decisions are made and proceedings conclude. The data is accurate as at 11 May 2020. The case which resulted in 4 convictions at the tail end of 2019 was actually reported to COPFS in February 2017 and so falls outside the parameters of the requested data.

¹⁵⁵ Data provided by the Department of Justice Northern Ireland. Source: Public Prosecution Service for Northern Ireland Case Management System; based on ‘most serious decision issued’ – relates to the number of defendants for whom a decision issued by the PPS for prosecution in respect of a human trafficking offence.

¹⁵⁶ Data provided by the Department of Justice Northern Ireland. Source: Public Prosecution Service for Northern Ireland Case Management System; based on ‘indictable disposal date’ – relates to outcomes at court in respect of defendants for whom a decision issued by the PPS for prosecution in respect of a human trafficking offence.

¹⁵⁷ Two persons were convicted of other offences (controlling prostitution) arising from Modern Slavery / Human Trafficking investigations. Source: Public Prosecution Service for Northern Ireland Case Management System.

Slavery and Trafficking Risk Orders (STROs) and Slavery and Trafficking Prevention Orders (STPOs), England and Wales¹⁵⁸

STROs and STPOs issued by Magistrates' Courts¹⁵⁹

	2017/18	2018/19	2019/20
Interim STROs	20	3	12
STROs	4	8	14
STPOs	1	1	2
STPOs on application	0	0	2
Total	25	12	30

Table A18

STPOs issued by Crown Courts¹⁶⁰

	2017/18	2018/19	2019/20
STPOs	29	49	24

Table A19

¹⁵⁸ Data provided by HMCTS. Every effort is made to ensure that the figures presented are accurate and complete. The figures supplied have been extracted from live administrative data systems, which is liable to change and have not been verified to the same standards as National Statistics. As a consequence, care should be taken to ensure data collection processes and their inevitable limitations are taken into account when data are used.

¹⁵⁹ Magistrates' Courts data are for each case where an 'Interim' or 'Full' Order was issued in the year specified, rather than a count of defendants. Hence, where a defendant has more than one case for which the relevant result code has been applied, each case will be counted separately. Where an Interim Order is made in one period which is then extended, only the original grant of the Interim Order will be counted irrespective of the period. Once an Interim Order has become a 'full' Order, only the 'Full Order' has been annotated in the table above. There is the potential for movement between the classification types from interim to full order (e.g. an Interim Risk Order issued and at a subsequent hearing converted to a Full Order, but resulted as a Full Prevention Order in error). These data inaccuracies cannot be retrospectively rectified within the case management system so have therefore been excluded from this dataset (analysis suggests these equate to less than 10%).

¹⁶⁰ Crown Courts data comprises of defendants who have received one or more of the above listed court orders. If a defendant receives the same order type on different occasions during the same month then it has been counted once. If a defendant receives the same order type in different months then it has been counted for each month.

Trafficking and Exploitation Risk Orders (TEROs) and Trafficking and Exploitation Prevention Orders (TEPOs), Scotland¹⁶¹

	2017/18	2018/19	2019/20
TEROs	0	0	0
TEPOs	2	0	6 ¹⁶²

Table A20

Slavery and Trafficking Prevention Orders STPOs, Northern Ireland¹⁶³

	2017/18	2018/19	2019/20
STPOs	2	0	0

Table A21

¹⁶¹ Data obtained from [trafficking and exploitation annual progress reports](#). Between 1 April 2019 and 31 March 2020, six people were convicted of relevant offences and all six were made subject to TEPOs. It is important to note that this data is based on the date of conviction rather than the date of report to the Crown Office and Procurator Fiscal Service (COPFS).

¹⁶² Figure provided by the Scottish Government. This includes one further incident that has been accounted for since publication of the 2019/20 annual progress report.

¹⁶³ Data provided by the Department of Justice Northern Ireland.

Breakdown of dedicated modern slavery and human trafficking resource

England and Wales¹⁶⁴

	SPOC	Triage protocols	Co-ordination	Investigation	Research and analysis	Intelligence
No. of forces with dedicated MS structure	43	25	18	15	15	11
% of all forces with dedicated MS structure	100%	58%	42%	35%	35%	26%

Table A22

Scotland¹⁶⁵

- Police Scotland’s National Human Trafficking Unit consisted of one detective inspector, two detective sergeants and four detective constables until 2019.
- In 2020 this number was supplemented by one detective inspector and one detective sergeant. These dedicated officers are further supported by a network of 40 human trafficking champions and 53 tactical advisors who have completed bespoke training and provide assistance to officers in divisions.

Northern Ireland¹⁶⁶

PSNI dedicated resource comprises:

- One detective inspector, two detective sergeants, eight detective constables and four detective constables (from Brexit funding).
- Two constables on secondment from district policing command, one DOJ deputy principal (DOJ and PSNI shared resource), and one Home Office Immigration Enforcement secondment.

¹⁶⁴ Data provided by the MSOIC Unit. Correct as of January 2020.

¹⁶⁵ Data provided by the Scottish Government.

¹⁶⁶ Data provided by the Department of Justice Northern Ireland.

Communications¹⁶⁷

Independent Anti-Slavery Commissioner @UKAntiSlavery · 1 May 2019

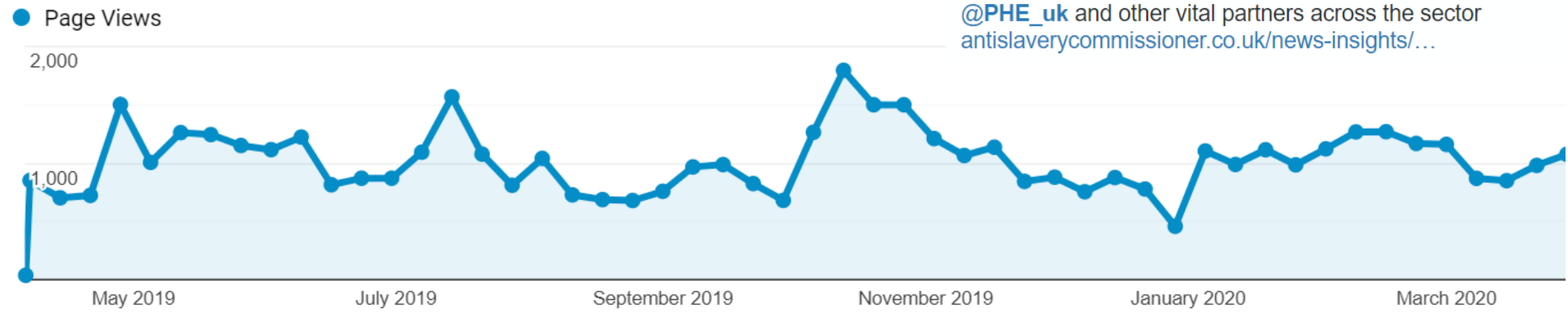
Sara Thornton today takes up her role as the UK's Independent Anti-Slavery Commissioner. Read her welcome message: [antislaverycommissioner.co.uk/news-insights/...](https://antislaverycommissioner.co.uk/news-insights/)

Independent Anti-Slavery Commissioner @UKAntiSlavery · Oct 29

"We owe it to those who have lost their lives to make a step-change in our efforts to eradicate the trade in human beings" Comments by Dame Sara in today's @thetimes [thetimes.co.uk/edition/news/...](https://www.thetimes.co.uk/edition/news/)

Independent Anti-Slavery Commissioner @UKAntiSlavery · Feb 7

Read Dame Sara's latest blog on exploring a public health approach to #modernslavery and #humantrafficking with @PHE_uk and other vital partners across the sector [antislaverycommissioner.co.uk/news-insights/...](https://antislaverycommissioner.co.uk/news-insights/)



News | 01 May 2019

Sara Thornton begins term as Independent Anti-Slavery Commissioner

News | 08 August 2019

"INTERVIEW-Too many modern slaves left in limbo, warns new UK anti-slavery chief"

News | 23 October 2019

IASC statement: Tragic discovery of 39 bodies found in lorry container in Essex

News | 14 July 2019

"Letters to the Editor: Firms must act to stamp out slavery"

News | 18 October 2019

Publication of the Independent Anti-Slavery Commissioner's Strategic Plan 2019 – 2021

¹⁶⁷ Digital reach (website and social media analytics) financial year 2019-2020.

Appendix C: Operation Fort Review: IASC maturity framework

BARELY ACHIEVING COMPLIANCE

- Superficial modern slavery statement – policy but no action
- Little or no mapping of supply chains
- Minimal awareness of modern slavery amongst staff
- Sole reliance on audits
- No protocol for dealing with labour abuse

MEETING BASIC EXPECTATIONS

- Evidence of activity or improvement in modern slavery statement
- Identifying areas of high-risk in the business and supply chains
- Educating suppliers on policy and setting expectations
- Regular staff training and awareness-raising exercises
- Having basic protocols for dealing with labour exploitation cases
- Installing whistleblowing hotlines

EVOLVING GOOD PRACTICE

- External challenge or working groups informing strategy
- Going beyond auditing – deep dives and unannounced visits
- Cascading ethical standards throughout supply chains
- In-depth training for staff in key roles, such as procurement
- Commitment to worker engagement
- Implementing the Employer Pays principle

LEADING ON HUMAN RIGHTS INNOVATION

- Board leading on human rights strategy
- Using data analytics to identify risk
- Local, national, international intelligence gathering
- Supporting suppliers to develop ethical competencies
- Pioneering new ways of worker engagement, using technology
- Factoring in the true cost of labour

Appendix D: Operation Fort Review: The Commissioner's agenda for action in 2020

CEOs must recognise modern slavery whistle blowers across their supply chains – Celebrate the heroes that have uncovered wrongdoing.

Companies like to talk about their robust human rights policies and zero tolerance for modern slavery, but to what extent is the wider workforce engaged in this agenda? What are the stories that are repeated in the organisation where modern slavery has been called out? Are the heroes recognised in the culture? Are these stories told at the water cooler? Clearly there are sensitivities around identifying victims, but it is important that those who challenge wrongdoing should be rewarded.

Boards must incentivise actions not words — Top-management bonuses should depend on anti-slavery wins.

The steps taken by top executives to promote decent work and to reduce the risk of modern slavery in their organisations and their supply chains should be factored in to their bonus structure. It is too easy for senior executives to declare commitment and profess zero tolerance. Recognition of genuine activity and improvement in compensation arrangements would send a very strong signal.

Annual reports should clearly explain provision for wages – If the total (non-management) labour costs in the supply chain are lower than minimum wages paid, companies should explain why.

There are many examples of approaches such as reverse auction where the price paid has little relationship to labour costs incurred. Procurement teams should show evidence that they have factored in the true cost of labour into goods and services.

If the price of goods is very low, then this should trigger questions about the potential for trafficking and exploitation.

Ethical audits should be unannounced – Companies should also explain how they are engaging with workers across their supply chains to understand vulnerabilities and human rights risks.

Most companies use social auditors for their own organisation and require their suppliers to do the same. However, most audits are announced, and the results are not always appropriately shared. Companies should commit to undertaking more unannounced audits and developing new technologies of obtaining feedback from workers.

Appendix E: Home Office audit of modern slavery statements (high level results)¹⁶⁸

Home Office audit – background and summary

Introduction

The Business & Human Rights Resource Centre (BHRRC), who were contracted to undertake an audit of compliance on the Home Office's behalf, concluded the audit in January 2020. BHRRC audited each of the organisations that the Home Office had identified as in scope individually. 41% of the compliance assessments were peer reviewed.

Summary of findings

Statements found

Of 16,016 organisations, BHRRC found that:

- 83% of organisations had either published a modern slavery statement (58%) or policy (4%), or were identified as likely to be covered by a group statement (21%).
- 8% did not have a website.
- 9% appeared to have a website but did not have a statement or another document, were not named on a group statement and did not have a linked entity covered by a group statement.

Of the statements found:

- 71% of statements were linked prominently from the organisation's **homepage**.
- 56% of statements clearly stated **Board approval**.
- 81% of statements were clearly signed off by a **Director or equivalent**.

Accompanying statement

While statutory guidance enables organisations to report as a group, there is no legal requirement for group statements to name the entities covered (21% of organisations audited were linked with, but not named on, a group statement). There is also no requirement for organisations without websites to publish their statement.

The audit assessed whether or not statements met the legislative requirements and did not seek to assess the quality of statements. The reference to publishing a modern slavery 'policy' refers to a small number of organisations that had published documents which focussed on their organisation's commitments or policies in relation to modern slavery, instead of reporting on the specific steps taken to prevent and address modern slavery. While these statements may be technically compliant, this approach did not meet the Home Office's expectations, as set out in guidance.

The Home Office is developing a Government-run digital reporting service which will make it easier for organisations which are reporting as a group and organisations without websites to publish their statements online and clearly demonstrate their compliance. The Government-run service will also provide a central platform for all statements published under the Act, to support investors, consumers and civil society to easily access statements and monitor progress.

¹⁶⁸ High level findings from the Home Office audit of modern slavery statements, shared July 2020. Text in full, reproduced as shared without amendment.

Role of the Independent Anti-Slavery Commissioner

Part 4 of the Modern Slavery Act (2015) created the role of the Independent Anti-Slavery Commissioner. The Commissioner has a UK-wide remit to encourage good practice in the prevention, detection, investigation and prosecution of slavery and human trafficking offences and the identification of victims.

Dame Sara Thornton was appointed as the Independent Anti-Slavery Commissioner by the Secretary of State following consultation with the Scottish Ministers and the Department of Justice in Northern Ireland. She took up post at the beginning of May 2019 and her appointment is for three years.

The Commissioner is given an annual budget with which to appoint staff and carry out her duties. She is accountable through her strategic plan and annual reports, which the Secretary of State lays before parliament, setting out the extent to which objectives and priorities are achieved. The Commissioner will publish her expenses and all Freedom of Information requests she receives.

To carry out her function the Commissioner can:

- Make a report on any permitted matter to the Secretary of State, the Scottish Ministers and the Department of Justice in Northern Ireland (reports must be requested by the Secretary of State, the Scottish Ministers or the Department of Justice in Northern Ireland; or be as detailed in the strategic plan)
- Publish reports (as laid out in the Act)
- Make recommendations to any public authority about the exercise of its functions
- Undertake or support the carrying out of research
- Provide information, education or training
- Consult and co-operate with public authorities, voluntary organisations and other persons

The Commissioner published her Strategic Plan 2019-2021 in October 2019, which stated the objectives and priorities for the period 2019-2021 and identified matters on which she proposed to report.

This document, the Annual Report 2019-2020, sets out the exercise of the Commissioner's functions and activities during 2019-2020.

Public authorities have a duty to co-operate with the Commissioner, share data with her and comply with requests (to the extent specified in the Act).

The Commissioner does not exercise any function in relation to individual cases save to draw conclusions for the purpose of considering a general issue.

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