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HMICFRS

By email: Wendy.Williams1@hmicfrs.gov.uk

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Dear Wendy,

The Hidden victims: report on Hestia's super-complaint on the police response to victims of modern slavery – Home Office progress update

Firstly, I wanted to take this opportunity to thank you for Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) report following Hestia's super-complaint into the police response to victims of modern slavery. It remains crucially important that we build on recent improvements to ensure victims of modern slavery receive the support they need and that offenders are brought to justice, and I welcome the recommendations in your report. I have been overseeing work my by team to implement the recommendations that fell to the Home Office and I am writing to provide an update on that work.

Modern slavery is a deplorable crime, which has a devastating and traumatic impact on victims. The Government is committed to tackling this crime and reaffirmed its ambition to support victims and prosecute offenders in the New Plan for Immigration (NPI), published in March this year. Disrupting offending to bring perpetrators to justice and the transformation of our victim identification and support system to ensure victims receive the support they need to start to rebuild their lives, are a key part of our response.

The Home Office has invested £15m since October 2016 to support the police to develop bespoke capability for forces to tackle modern slavery. This has led to a step change in how the police understand the threat of modern slavery, identify, safeguard and refer victims through the National Referral Mechanism (NRM) and work closely with Crown Prosecution Service (CPS) through the early stages of investigation. We also issued statutory guidance under Section 49 of the Modern Slavery Act 2015 in March 2020 and have continued to review this to ensure it remains up to date to provide a clear framework of support. The guidance clarifies the roles and responsibilities of frontline



staff and local stakeholders and sets out the support victims are entitled to and how this is accessed.

Since the Modern Slavery and Organised Immigration Crime Unit (MSOICU) (formerly the Modern Slavery Police Transformation Unit) was established we have seen tangible differences. The considerable increase in live police investigations, from 188 in December 2016 to 3869 in October 2021, and subsequent increases in police recorded modern slavery offences and referrals to the CPS, are all testament to police efforts to improve the response since the first HMICFRS inspection on modern slavery in 2017.

The identification and safety of a victim should always be paramount in any law enforcement action. However, we know that victims can be fearful of law enforcement due to the manipulative and coercive situations they have experienced at the hands of their exploiters. The significant trauma suffered by victims of modern slavery requires a sensitive, informed, and tailored response from police officers dealing with victims. Through the MSOICU, the Home Office has made funding available to provide specialist training for police victim liaison officers to build trust with victims to facilitate positive engagement with the criminal justice process, using a victim centred approach.

The Home Office recognises that there is, however, more to do to ensure consistency in the response to victims across forces and we welcome the report, its conclusions, and recommendations. I have outlined below progress made to implement the two recommendations for the Home Office.

Recommendation 1

In consultation with chief constables, the Independent Anti-Slavery Commissioner, Victims Commissioners, the Crown Prosecution Service, voluntary agencies that provide support to victims, and others as appropriate, commission work to:

- better understand the victim experience of the police response to modern slavery and the wider response from immigration and other law enforcement agencies;
and

- assess the extent and nature of poor victim experiences (from first contact with the police, through to investigation and prosecution stages where these occur) to understand and identify how they can be improved.

b. The work commissioned should seek to result in recommendations for specific actions that will further improve victims' experiences. The Home Office should publish the findings of this work.

We agree that we need a better understanding of the victim experience, from their initial identification through to their support and recovery and engagement with the criminal justice system to help bring the perpetrator to justice. As announced in the NPI, we have a package of measures underway to both ensure victims are identified and supported as quickly as possible and to support victims to engage with the criminal justice system (CJS). Understanding the victim experience will be vital to the delivery of this work.

As outlined in the NPI, we recently launched a grant fund of up to £350,000 to invite bids from police forces and the Gangmasters and Labour Abuse Authority to trial and evaluate further activities to support victims to better engage with the CJS. Successful bidders will



be notified in the coming days. We have also commissioned independent research to evaluate existing NGO-led initiatives (such as 'victim navigators') within some police forces to improve victim engagement with the CJS. We will share the learning from this research among all police forces and Police and Crime Commissioners to ensure they have the information and evidence they need to make informed decisions and improvements in the way they support victims of modern slavery.

We are also currently reviewing all aspects of the 2014 modern slavery strategy, engaging with a wide range of partners to consider our approach to victim support and the law enforcement response. The new strategy will be informed by the evidence and research we have gathered from the experiences of victims.

We also continue to fund and oversee the work of the MSOICU to improve the police response to modern slavery (led by Devon and Cornwall Police). In addition, as part of our support to public authorities and NGOs, we have developed e-learning training for First Responders and have established a new forum to bring together and work with first responder organisations to ensure they have the tools and training to identify victims promptly.

The programme of work outlined above will enrich and add to our understanding of the experience of victims of modern slavery. We do not therefore consider it is necessary at this stage to commission separate research but will continue to deliver on this recommendation through our existing programme of work. We will continue to work with partners, including the Independent Anti-Slavery Commissioner, to ensure the learning from our work is disseminated effectively.

Recommendation 5

Assure themselves that the support mechanisms provided by bodies under government funding are consistently making available high-quality provision for victims of modern slavery.

We are committed to delivering personalised, needs-based support to ensure that the individual victim and their recovery needs are at the centre of the support we provide.

We agree that the quality of provision for victims of modern slavery is vital to assist with their recovery needs to help rebuild their lives. That is why the Government continues to provide adult victims in England and Wales with this specialist support through the Modern Slavery Victim Care Contract (MSVCC), delivered through The Salvation Army. The five-year MSVCC went live on 4 January this year and at an estimated whole life cost of £379m over five years, will deliver a service that is needs-based and better aligned to the requirements of individual victims. The supplier's performance will be managed by a dedicated contract management team in the SCA supported by a defined governance and escalation framework, in line with its 'Gold' contract status.

To assist with a victim's physical, psychological and social recovery the MSVCC provides victims with specialist support and advocacy services. This includes safehouse accommodation if needed, financial support and access to a dedicated support worker to assist the victim in accessing a wide range of support, including health care and



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counselling provision through the NHS and legal representation. This is alongside other important support provided by the MSVCC such as transport and support with translation and interpretation.

Following a positive Conclusive Grounds decision, a Recovery Needs Assessment (RNA) is conducted for all adult victims receiving support through the MSVCC. The RNA process ensures that support is personalised to the victims' individual recovery needs and informs a tailored move-on plan to help them transition out of MSVCC support and back into a community, as appropriate. Post-NRM reach-in support is available to confirmed victims following move-on, providing information and signposting as needed to help support a smooth and sustainable exit from the NRM.

The Home Office has also worked with the Care Quality Commission (CQC) to develop an inspection regime based on the Human Trafficking Foundation's updated Slavery and Trafficking Survivor Care Standards. CQC have been appointed to conduct independent inspections of safehouse and outreach services under the MSVCC, this work provides the Home Office a tool to monitor the effectiveness and quality of the support provided.

During the Covid-19 pandemic, CQC adapted their way of working, using a hybrid approach to carry out on-site inspections of accommodation when safe to do so, together with conducting remote assessments. Furthermore, as a result of the increasing pressures that Victim Care Contract support providers were facing during the pandemic, the Home Office worked with the CQC to establish a dedicated email address for support providers to raise any issues they experience in accessing health and care services, or the quality of such services. We will continue to work with CQC to ensure we identify, and seek to address, challenges victims have in accessing key services.

The Home Office understands the concerns raised in this super-complaint and we are grateful to HMICFRS for considering the issues. We will continue to work closely with key partners across a wide range of actions in England and Wales to strengthen our approach, and to ensure that the law enforcement response to modern slavery is robust enough to deal with the complexities of this hidden and evolving crime.

Yours sincerely

Damian Johnson
Deputy Director
Modern Slavery Unit