



APCC Progress Update on Modern Slavery

Introduction

In May 2021, HMICFRS published a report on Modern Slavery in response to the super complaint from Hestia (henceforth referred to as the Hestia report). It found that the improvements have been made in the police response to victims of modern slavery since the 2017 HMICFRS inspection but that issues remain around the inconsistency of support for victims and ability of the police to investigate these crimes effectively.

The report contained a recommendation for the APCC to collate Police and Crime Commissioners' progress in implementing their recommendations and report these to HMICFRS within six months of the date of publication.

The recommendation is as follows:

“To chief constables, and police and crime commissioners: Work together to understand the support needs of victims of modern slavery crimes. They should provide appropriate support within their respective remits to augment the national provision so that victims feel safe and empowered to remain involved in any investigations. This should focus on what support should be available before and after National Referral Mechanism (NRM) referral as well as alternative provision available for those declining NRM referral.”

In accordance with the above recommendation, the APCC requested that all PCCs, PFCCs and Deputy Mayors provide an update on their work to support victims of modern slavery before, after and outside of the NRM and their work to support, and where appropriate, challenge the police on their ability to effectively engage with modern slavery victims and investigate associated crimes. 38 responses were received from PCCs, PFCCs and Deputy Mayors with this report highlighting key improvements, provisions, and future work. These responses are submitted on behalf of the PCC only, however OPCCs would have collaborated with their forces in the work detailed below.

The six month deadline for the updates is a short period of time in the context of planning and executing programmes and services. This has meant that a number of responses refer to work that commenced before the Hestia report and has either been embedded, accelerated, or evaluated in the six months. We respectfully ask you take this into consideration when assessing the responses.

Executive Summary

Victims' services

Police and Crime Commissioners are responsible for commissioning most local support for victims of crime, including modern slavery, and receive funding from the Ministry of Justice specifically for this purpose. Recent changes to the nationwide Modern Slavery Victim Care Contract (MSVCC) mean that a greater number of confirmed victims of trafficking are now able to access support for longer following their NRM decision.

Locally, PCCs and Deputy Mayors are uniquely placed to commission specialist community-specific support based on local needed assessments. We have outlined below some of the work that PCCs are doing in this area to ensure that victims of modern slavery receive the gold-standard level of care that is required to help them cope, recover and feel capable to support investigations.

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In all responses, victims of modern slavery who do not consent to a referral to the National Referral Mechanism or who end their support relationship with the national commissioned service are able to access the community victim support services commissioned by PCCs.

- In **Cambridgeshire**, the Police and Crime Commissioner funds two Specialist Victim and Witness Care Co-ordinators dedicated to supporting victims of modern slavery and human trafficking. The Co-ordinators also act as the professional leads on the provision of specialist expertise to police officers and staff and colleagues from partner agencies to ensure migrant victims of trafficking are dealt with sensitively and supportively.
- In March 2021, **Devon and Cornwall** Police introduced 40 specially trained Modern Slavery Victim Liaison Officers (MSVLOs) who are available for deployment to all cases of MSHT where a victim has been identified. The purpose of the MSVLO is to provide a single point of contact for the victim and to assist with matters including safeguarding, obtaining an account, welfare, assisting with the NRM process and signposting to relevant support agencies. The force have already made a number of MSVLO deployments and the introduction of this new role has received some excellent feedback.
- In **Essex**, the PFCC has supported the recruitment of independent Victim Care Navigators, provided by Justice and Care, to offer support and advocacy to victims of MDS/HT. Support is bespoke depending on the victims' needs; ranging from advocacy and signposting, through to emergency housing where required, as well as practical support such as clothes, a phone and food.
- **Hertfordshire** has an Exploitation ISVA funded last year through the MoJ IDVA/ISVA grant fund. The role is as much about outreach as it is supporting victims and links in with other local provisions. This post has demonstrated excellent outcomes including developing relationships with local legal specialists who have provided advice and guidance with regard entitlements and settlement (pro-bono) and working with local housing providers.
- **Surrey** has funded a Victim Navigator to support all adult victims of modern slavery. The post works in partnership with Surrey police and provides strategic advice around victims engagement as well as supporting the victim to make informed decisions about their engagement with the police, the NRM and other support services. The Navigator programme has been externally evaluated and has led to a significantly higher rate of engagement with police investigations. Surrey are now looking to expand this service to include an additional Navigator.
- **Cheshire** have recently commissioned a Victim's Needs Assessment which included engaging with victims of modern slavery first-hand to ensure that their views and experiences are incorporated into the development of the Assessment which will then directly influence commissioning in this area.
- In **West Midlands** the PCC is commissioning an innovative Community Engagement project in collaboration with Black Country Women's Aid in respect of increasing the identification of victims of sexual exploitation. The project aims to increase access to support for vulnerable sexually exploited women who are victims of modern slavery in the West Midlands. The service works closely with police and partner agencies to develop/respond to intelligence, map sex work/exploitation across the region and engage with potential and identified victims.

Force OPCC collaboration

The HMICFRS recommendation calls for PCCs and Chief Constables to work together to understand the support needs of victims of modern slavery crimes. There is an important distinction between the role of PCC, elected by the local community with responsibility for the totality of policing in the area, and the Chief, providing operational leadership for policing in the geographical area. We have

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outlined below several examples on a local level where PCCs and Chiefs have worked together to augment the national provision to ensure that modern slavery victims within their areas are supported to cope and recover.

- **Gloucestershire's** Operation Aidant, a MSHT intensification programme, involves the PCC and the police working together to provide the best victim service and raise awareness across the force area. OPCC and Constabulary thematic leads meet monthly to discuss ongoing work, review combined services, and ensure they jointly provide the best victim service possible in Gloucestershire.
- In **Cumbria** the PCC, as Chair of the Safer Cumbria Partnership, and the Constabulary have worked together to secure an agreement from Local Authorities to access their accommodation temporarily, when needed, to address the immediate accommodation needs of modern slavery victims.
- **Dyfed Powys** are supporting the force to engage with key sectors that often rely on low skilled workers to undertake labour. This project will seek to provide education for individuals to understand rights and spot signs of exploitation alongside a high profile media campaign within the farming and construction industries.
- In **Bedfordshire** the PCC and force are working together on a Modern Slavery/Human Trafficking Improvement Plan.
- In **Staffordshire** the force is actively working with the PCC on the delivery of the Victim Code of Practice (VCOP) to ensure that victims receive the Rights that they are entitled to. This has led to the implementation on the NICHE force system a 'victim contract', which prompts the OIC to ensure that they are asking the right questions i.e. access to interpreters and providing the necessary support as part of the investigation process.
- Through the PCC's precept investment in 2020/21 in **Suffolk** the Constabulary have created Modern Slavery and Vulnerably Community Advisors who analyse trends, develop intelligence and target victim intervention work across the force area. These roles will soon be subject to a formal evaluation which will help to identify opportunities for further investment.
- The Deputy Mayor's Office has funded a new modern slavery investigative team for a 12-month pilot period. Along with six Investigative Support Officers, a data manager and a training coordinator have also been funded to support the whole system approach we taken in **Greater Manchester**. The team is subject to an independent evaluation to capture what works and what impact specialist investigative functions have in this area. This compliments the existing triage function the MSCU carries out, as well as building on its functions of informing the wider system of what modern slavery and human trafficking looks like in Greater Manchester, and how to identify and report concerns at the earliest opportunity to enable potential victims to be safeguarded. It evidences the ongoing commitment of the Chief Constable and the Deputy Mayor to work together to support potential victims of modern slavery.

One of the main responsibilities of a PCC (or Deputy Mayor) is to hold the Chief Constable (or equivalent) to account for the efficient and effective policing of an area on behalf of the public. PCCs have been able to provide a number of examples where they have exercised this governance role to ensure that their forces are providing the best possible service to meet the needs of victims of modern slavery.

- Since the publication of HMICFRS' report **Suffolk** have met with their force operational lead for Modern Slavery to discuss their joint recommendation and seek assurance that local victim arrangements are understood and well-exercised.

- **Durham** reported that the recommendations with the Super Complaint helped to focus them in providing appropriate response to, and care for, victims of modern slavery. As such Durham Constabulary now have a range of actions and initiatives embedded such as daily threat assessments, Victim Liaison Officer training, expansion of the CSE team, Section 45 defence training and modern slavery being recognised as a priority by the Durham Safeguarding Boards. Most recently, a Modern Slavery Network has been developed in Durham which has been supported by funding by the PCC. Whilst the Network is still in the early phases of implementation there has been support from a range of partners and the initiative will aim to establish a better understanding of support pathways for victims of modern slavery and human trafficking. Durham also report an increase in the number of successful prosecutions.
- Following the initial publication of the HMICFRS report **Dyfed Powys** requested regular updates from the force in respect of the recommendations that were made. They report that they are satisfied that the force has demonstrated comprehensive arrangements to deal with modern slavery cases and exhibited a continuing commitment to improving how victims are recognised and supported.
- In **Essex**, the PFCC monitors the volume of modern slavery investigations and referrals via the monthly Performance and Resources Board. This ensures that the PFCC remains informed of relevant activity and can hold the Chief Constable to account for the performance of Essex Police in relation to modern slavery.
- The **Cheshire** PCC attends a quarterly vulnerability board where assurance is sought the Constabulary is sufficiently responding to the needs of victims, including victims of modern slavery.
- The **Cleveland** PCC is to monitor the progress of the Chief Constable in meeting the force's recommendations within the HMICFRS report via his scrutiny programme.

Partnership working

The police cannot tackle this on their own. As such, all Police and Crime Commissioners work in partnership at national, regional, and local levels to support victims of modern slavery.

The National Anti-Trafficking and Modern Slavery Network (NATMSN), currently chaired by the Deputy Mayor for West Yorkshire, brings together Police and Crime Commissioners, the Independent Anti-Slavery Commissioner, The National Police Chief Council (NPCC) and Home Office Modern Slavery Unit to discuss and improve how we work together to combat modern slavery and human trafficking in all forms. It is via this network that PCCs work on a national level to ensure that victims of modern slavery are able to access the necessary support and that police forces are provided with training and resources to achieve positive criminal justice outcomes on their behalf.

Police and Crime Commissioners also play a vital role on a local level to convene statutory partners. Below we have highlighted examples of effective partnership working facilitated by PCCs to tackle modern slavery on a local level.

- The Challenger Executive Board in **Greater Manchester**, which is lauded as an example of multiagency working, oversees a Modern Slavery Theme group, and operational and tasking groups that support activity, including the Modern Slavery NGO Forum and the Modern Slavery Business Network. The NGO Forum, brings together predominantly voluntary and community sector organisations to share information regarding services and support, build relationships and upskill. The forum members have developed excellent relationships with the MSCU, which means that there is confidence in reporting potential incidents to the police, and the networks in place to support victims once identified.

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- **Cleveland** has had a Pan Cleveland multi agency partnership since 2018. As the PCC supports this work, it leads to buy-in from many other partner organisations, and now that the Local Authorities (LAs) also provide financial support to the network means that they too are directly invested and involved in the partnerships work. The fact that they feel supported and not left to address the many issues alone, is of enormous importance to them, and is evident by their consistent and continuous attendance at the various work streams and task groups.
- It is the intention of recently elected **Merseyside** PCC Emily Spurrell to relaunch the local Modern Slavery Network which will invite partners and stakeholders to work together in ensuring there is a comprehensive offering of victim support across Merseyside.

Challenges

To ensure appropriate and comprehensive support services for victims of modern slavery are commissioned at all stages of the NRM process, it is important for PCCs to work to understand the challenges and barriers within this area. The identification of gaps within existing services is key to the establishment of gold standard provisions and interventions going forward. We have outlined below some examples where PCCs have identified challenges and how they have worked to mitigate them.

Languages

One of the key challenges raised with providing services for victims was that often there is a language barrier.

- **Cambridgeshire** has a Lithuanian and a Romanian-speaking member of staff. This enables the wider Victim and Witness Hub to support both nationalities in their native language and many others through common languages. The staff say that being able to speak to a potential victim in their own language often leads to better engagement and a chance to develop a relationship of trust. In turn this increases the likelihood of the victim engaging with any future criminal justice processes and accessing support for their needs.

Engagement with victims both in and outside of the NRM

- A common issue, reported by several PCC areas is getting victims to engage with the police and subsequently consent to being referred into the NRM due to the stereotype of police often created by those who exploited them.
- Having identified victim engagement as an issue the **West Midlands** PCC has commissioned an innovative response to safeguarding modern slavery victims and enhancing their chances of remaining engaged with the CJS process. The Slavery Adult Safeguarding Case Conference (SASCC) provides a model which is similar to that of a MARAC and is now embedded in each local authority area. The PCC reports that the conference is working well and has improved pathways into safeguarding for adult victims of modern slavery and human trafficking.
- **Avon and Somerset** agreed there is a challenge with engaging individuals who decline NRM referral, particularly while also ensuring their engagement with other services simultaneously. Unseen Support Workers and A&S Police continue to share information and signpost potential victims to relevant services whilst making welfare visits. The inclusion of support workers on visits is crucial in building rapport and establishing a relationship of trust with potential victims.
- **Humberside** are taking steps to ensure that support for victims both in and out the NRM is person centred, community based and provided, where possible, by expert third sector

partners with experience of supporting victims to enable recoveries and integrate back into the community.

- **Wiltshire**, in collaboration with their force, have commissioned 'Victim go bags' that contain new clothes and toiletries and are given out at point of contact. These bags are positively received by victims who have reported they felt cared for and helped establish trust with officers. Since the initial order Wiltshire have doubled the number of bags they give out and have adapted them to meet additional needs.

Securing Accommodation

The HMICFRS report identified a lack of consistent accommodation provision as being an area of concern, in particular as it can often lead to victims being deterred from engaging with the police further. PCCs have updated us on the work they are doing to tackle this.

- **Cumbria** recently conducted a review of the approach to tackling modern slavery in the county, under the Home Office STAR Programme, which included looking at the process for engagement with and support for victims. The report recognised that further work is needed to look at what accommodation could be accessed for those who decline the NRM or are not eligible for a Salvation Army safe house, as well as an agreement on which organisation should provide subsistence, as this is currently being provided by the Constabulary where needed. A multi-agency group is developing an action plan in relation to these.
- **Hampshire** is working with their Local Authority Housing Teams regarding the potential of Pre-NRM accommodation. They have also identified a possible venue and partner to provide the accommodation once funding is agreed in the form of a convent-turned-conference centre that could provide safe lodgings.
- **West Yorkshire** have also identified the provision of accommodation for pre-NRM individuals as a key challenge. It is often the case that potential victims are placed temporarily within hotels and B&Bs – this is not always appropriate and can increase the risk of further exploitation, going missing and loss of evidence. There is continuing uncertainty between Local Authorities and others as to whose responsibility it is to house potential victims in the pre-NRM space.
- In **West Mercia** the PCC has a Modern Slavery Accommodation and Subsistence Fund which provides the force with funding to purchase emergency accommodation and any items the victim may need e.g., sanitary items, clothing, short term food.
- This critical point in victim engagement was identified by **the Home Office** in their announcement of the inclusion of a new 'places of safety' scheme within the latest Modern Slavery Victim Care Contract (MSVCC). The new service was proposed to be for the most vulnerable victims rescued from exploitation and would provide them with a safe place for up to three working days to consider if they want to enter the NRM. As of yet, PCC areas are still awaiting confirmation of a start date for this provision.

Covid-19

- The Covid-19 pandemic has introduced a number of additional complexities over the past 18 months such as extended delays in court proceedings which makes it harder to keep victims engaged. This is especially true for those victims who are most vulnerable and intimidated.
- **MOPAC** identified the importance of focusing on preventative activity after there were concerning reports of a drop in referrals during the pandemic. This work includes the commissioning of communications campaigns in smaller organising which are known to have links into hard-to-reach communities.

Continuous improvement

As part of their role in holding to Chief Constables to account, Police and Crime Commissioners are key drivers of continuous improvement in their force areas, listening to victims and their communities and working with Chief Constables to develop and pilot new ideas and initiatives to improve policing's response to modern slavery.

As noted at the beginning of this report, responses have covered further back than May 2021, but they are also looking forwards, particularly with the Police and Crime Commissioners newly elected in May seeking to establish and develop their own ideas and initiatives which will take time to come to fruition.

- Below are a number of examples from responses of Police and Crime Commissioners demonstrating this spirit of continuous improvement. **Devon and Cornwall** are currently reshaping victim care support arrangements to evaluate current provision and re-specifying a new victim care contract. This presents an opportunity to understand their support need more fully and to respond to that need when these new services go live on the 1st of April 2022. **Devon and Cornwall** recognise that more needs to be done to ensure victims know they can receive community support locally and as a result they have already started to work with their local partnerships to launch the support fund and ensure that their local provision is advertised within partnership protocols.
- **Dyfed Powys** will be seeking support through the Modern Slavery Prevention Fund to engage with key sectors that often rely on low skilled workers to undertake labour. The EU exit has added uncertainty to the status of many of these workers leaving them highly vulnerable to exploitation. The funding will seek to fund education in this area of 1,000 individuals to understand rights and spot the signs of exploitation. The training will be supported by high profile campaign within the farming and construction industries.
- **Hampshire** are delivering a Modern Slavery Partnership's victim pathway and a new NRM pathway process map developed by their local Police so internal Police teams are aware of their statutory duties and details on how to crime any investigation. Both of these system maps are designed to provide an effective and swift response for victims identified by detailing the initial steps first responders should take upon identification.
- **Lincolnshire** are in discussions with the MS Regional Coordinator to establish 2 Victim Navigator roles for the East Midlands region. An Expression of Interest has been made to submit a bid for Home Office funding (early-market engagement victim support through CJS funding) to enhance the support provided by regional Victim Navigators. An evaluation will take place on the impact of the Victim Navigator roles once they are introduced to inform the future specification of the locally commissioned victims outreach support service.
- **Leicestershire** are also implementing victim navigators (a regional collaboration) provided by Justice in Care. One of the victim navigator posts will be based at the Safeguarding Hub at Wigston. The post is anticipated to be in place by January 2022. This post will strengthen the support the Force is able to offer to potential victims before they enter the National Referral Mechanism (NRM).
- Over the next 12 months **Wiltshire** are planning on increasing partnership work through the new Anti-Slavery Partnership board.
- **Warwickshire** are in the process of commissioning a new Victim Needs Assessment and have expanded the scope to incorporate support for victims of modern slavery before, after and outside of the NRM within the terms of reference.

- **Suffolk** are seeking to work with Victim Support, the main provider of the victim care contact in their area, to understand further why take up for modern slavery services are low despite referrals being received and services being in place.
- In **Nottinghamshire** the PCC and police force are exploring opportunities to extend the Red Cross 'Your Space' provision to Nottinghamshire with a view to both strengthening victim care and freeing up police resources to pursue criminal justice outcomes. Funding is currently being sought to revisit the successful pilot that ran in Nottinghamshire which would service to enhance local pre-NRM support offer including those with no recourse to public funds.
- **North Wales** are establishing a local Modern Slavery Practitioner's forum with the intention of holding the first meeting in November 2021. A report on the achievement, benefits and challenges of the forum will be commissioned after 12 months to understand the impact and value that it brings.
- **MOPAC** have acknowledged the changing picture of modern slavery and seek to consistently understand new emerging issues in this area and how they can be strategically addressed through the development of the upcoming Police and Crime Plan.
- **Avon and Somerset** are working with the constabulary and Unseen, their current service provider, to explore the risks and issues identified in the HMICFRS report prior to the 2022/23 grant renewal.