



Dame Vera Baird QC's Response to the APCC Modern Slavery and the Role of the First Responder Consultation

Background

In December the APCC lead for Modern Slavery and Human Trafficking PCC Mark Burns-Williamson, highlighted the ongoing government reforms to the National Referral Mechanism (NRM) in relation to modern slavery and called for PCCs to provide their views regarding the review of the role of first responders.

As the questions posed would benefit from an operational insight I have used Northumbria Police's views to help shape the draft response below.

Q1. Which agencies should be First Responders further to those who already have this responsibility? Please give your reasons as to why you would recommend these agencies.

In principle, all agencies and organisations who find themselves with grounds for concern that a person may be a victim of modern slavery have a responsibility for identifying the person as a possible victim and putting them in touch with the responsible authorities and support providers.

It is of benefit that those organisations classified as first responders can refer a potential victim of modern slavery directly into the NRM and anyone outside the NRM who wishes to raise modern slavery concerns can do so through a first responder.

Health and social care organisations are identified as first responders which includes for example Sexual Health Clinics, however exploitation and trafficking connected to sex work is common and therefore broadening the scope to capture professionals working within environments connected to sexual health such as pharmacies and dispensaries would be of benefit.

Organised criminals involved in slavery and trafficking do not isolate their offending to slavery/trafficking alone. Often a number of other crime types form part of the overall offending, particularly fraud, often utilising victims of slavery and trafficking to obtain a range of state benefits relating to housing, children and disability. With this in mind the Department for Work and Pensions may be well placed to be a first responder, they may have less general face to face contact with claimants however our experience is that they are increasingly proactive in identifying this typology.

It is also worth considering banks and Money Service Bureaus as first responders. Businesses are frequently utilised as a vehicle for fraud and the laundering of the proceeds of crimes connected to slavery, trafficking and exploitation. Victims are often physically presented at banks by those controlling them to open accounts. Money Service Bureaus are also utilised to transfer either the proceeds outside of the UK by offenders or used by victims to send what small amounts of money they may have left back to their families. Whilst money laundering regulations are in place as a

mechanism to report 'suspicious activity' it is obvious that high street banks and money service bureaux are physically seeing both offenders and victims on a frequent basis.

Q2. What are your recommendations regarding an alternative approach to training First Responders?

Training needs to be structured and key learning outcomes consistent across the country however it can be delivered in a range of ways. A recent example of very localised training/awareness raising was the modern slavery conference that Northumbria Police held for a wide range of partner agencies. Extremely positive feedback was received from attendees. Key sessions provided information about:

- Victim identification
- Victim debrief
- Completion of NRM form
- Ongoing contact with the Single Competent Authority during the NRM process

Learning between forces is strong in the North East region particularly where the outcomes of investigations are analysed in order to outline what works and where improvements can be made. A regional approach to understanding modern slavery and learning what works in terms of identification, investigation, victim support and working with key national partners is an essential part of this.

Northumbria Police have also recently worked with a local car manufacturer to develop a training video which will be used to raise awareness of modern slavery issues within their workforce. Feedback will be monitored in relation to the delivery of this with a view to developing this concept further and with other key business areas.

Q3. Which agency should hold the responsibility for the delivery of training for First Responders?

The Home Office should have ultimate responsibility for delivery training to First Responders with support from local police forces. Police forces arguably are the agency that most frequently have some hand in both investigating these types of crimes and with responsibility for safeguarding those who fall victim of it.

Over the last two years the 'What Works' team, which forms part of the Modern Slavery Police Transformational Fund has developed and supported the delivery of a range of modern slavery training packages. As part of this stakeholder guidance that builds on the practical and operational experiences of law enforcement and partners will soon be available – it would make sense for any new training to build on this already established package.

Modern slavery is a crime that crosses borders and requires many agencies to work together. International cooperation is often necessary, sometimes from countries where slavery is not even recognised as a crime, the police are therefore most uniquely based to lead however it must be recognised that success can only be achieved through joint alliance.

Q4. Please provide any examples of local and regional best practice of collaborative multi-agency working with First Responders to support victims' referral in to the NRM.

Northumbria's Operation Cluster was a complex human trafficking and modern slavery investigation involving members of a well-established Slovakian Roma Gypsy organised crime group.

The investigation commenced in October 2016 as a result of concerns around a young female at an address in Newcastle upon Tyne.

The investigation utilised a multi-agency approach involving HMRC, DWP, Immigration and GLAA. This revealed a large complex network of approximately 70 persons believed to comprise a combination of suspects, family associates, alpha victims and victims predominately based in the West End of Newcastle. The evidence showed vulnerable Slovakian / Czech nationals being recruited and trafficked across to the UK on the promise of work. They were placed in low quality housing and taken to the DWP, banks and recruitment agencies by the criminals who acted as interpreters. The criminals retained their identification cards, passports and bank cards. The criminals would make weekly withdrawals from victims' accounts and effectively steal their wages. A fraction was given to the victims. The victim's bank accounts are also used to make fraudulent benefit claims. Whilst the main criminality of this OCG is the exploitation through forced labour and large scale benefit fraud, intelligence indicates that females are also subject of sexual exploitation.

As a result of the investigation two males were safely located and subsequently referred into NRM. Six suspects were arrested, all members of the same family, five of which were charged and remanded in custody.

Two police led multi-agency operations and strike days followed. A dedicated reception centre was in operation on both occasions where any identified victims were taken following arrest and recovery phase. At the reception centre victims were engaged and supported by agencies including, NHS, British Red Cross, Hope for Justice, Newcastle local authority resilience, housing and adult social care. During these two strike phases a total of 18 warrants were executed at addresses across the West End of Newcastle, 26 arrests made and 16 potential victims recovered to reception centre. The NCA and NEURSO also supported this exercise.

In total offenders were sentenced to in excess of 40 years imprisonment and slavery and trafficking orders were made. A multi-agency formal structured debrief was held on conclusion and the recommendations are currently under review and implementation.