

REQUEST FOR DMPC DECISION – PCD 294

Title: Modern Slavery Unit

Executive Summary:

In September 2016, Devon and Cornwall Chief Constable Shaun Sawyer, NPCC Lead for Modern Slavery (MS), and his team successfully bid into the Police Transformation Fund to support the introduction of a number of projects to improve the national policing response to MS.

The bid was to create seven national and regional units/functions. Although the MPS will benefit from all of the aspects, two of the functions, the Regional Analyst post and the Triage Centre, offer direct funding to the MPS for the creation of new posts and functions.

The paper therefore requests approval for collaboration with the Police and Crime Commissioner for Devon and Cornwall and the acceptance of funding of £264,112 for the establishment of the Triage Centre and the Regional Analyst post.

Recommendation:

The DMPC is asked to approve;

- Approve a collaboration with the Police and Crime Commissioner for Devon and Cornwall, under S22 of the Police Act 1996
- Pursuant to s93 of Police Act 1996, accept of funding of £264,112 over a two year period (2017/18 and 2018/19) for the establishment of the Triage Centre and the Regional Analyst post.

Deputy Mayor for Policing And Crime

I confirm I have considered whether or not I have any personal or prejudicial interest in this matter and take the proposed decision in compliance with the Code of Conduct. Any such interests are recorded below.

The above request has my approval.

Signature

Spur Under

Date

20/11/17

PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE DMPC

Decision required – supporting report

1. Introduction and background

- 1.1. Year on year offences of MS (Modern Slavery) have seen a significant increase nationally. Within the MPS alone, recorded offences have risen from 270 offences in 2015 to 1013 in 2016. That upward trend has continued into 2017. Despite this increase, intelligence would suggest that MS remains a hugely under reported crime with an estimated 10,000 – 13,000 potential victims across the UK. MS is intrinsically linked to the wider aspects of Serious Organised Crime
- 1.2. In September 2016 Devon and Cornwall, successfully bid to the Home Office for funding through the Police Transformation Fund to ensure that police and partners reduce the vulnerability, threat and risk surrounding MS criminal activity, establishing nationally coordinated action, assessment, guidance and training.

2. Issues for consideration

- 2.1. Establishment of the triage centre within the MPS will not only have an immediate impact on the Modern Slavery and Kidnap Unit, freeing up resources to concentrate on live investigations and better servicing those referrals with a London footprint. It will create a stronger evidence base for National Policing to understand the challenges and inconsistencies of the National Referral Mechanism/Duty to Notify process to influence changes required within the system and identify what else needs to be addressed.

3. Financial Comments

- 3.1 The grant of £264,112 (£86,385 2017/18 and £177,727 2018/19) would be utilised to fund 3 FTE (2 officers and 1 staff) as well as relevant support and overhead costs. The creation of these roles and functions will not impact on MPS budgets, as all additionality and allowance for support costs and overheads are included in the funding offer.

4. Legal Comments

- 4.1. S22 of the Police Act 1996, as amended by Section 89 Police Reform and Social Responsibility Act 2011 allows the MOPAC, as the local policing body, in connection with the discharge of any its functions to enter into a collaboration agreement.
- 4.2. The MOPAC Scheme of Delegation at Clause 4.5 requires the Deputy Mayor for Policing and Crime to approve all collaboration agreements where the Act requires. As this is a policing body collaboration, it is required.
- 4.3. There will be a written agreement between the MOPAC and the PCC for Devon and Cornwall to formalise the arrangement. The agreement will be published under the Elected Local Policing Bodies (Specified Information) Order 2011.

5. Equality Comments

5.1. Equalities considerations have been taken into account particularly concerning the support of vulnerable and diverse communities/victims who are at greatest risk from MS.

6. Background/supporting papers

6.1. Report.

Public access to information

Information in this form is subject to the Freedom of Information Act 2000 (FOIA) and other legislation. Part 1 of this form will be made available on the MOPAC website within 1 working day of approval. Any facts/advice/recommendations that should not be made automatically available on request should not be included in Part 1 but instead on the separate Part 2 form. Deferment is only applicable where release before that date would compromise the implementation of the decision being approved.

Part 1 Deferral:

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 Confidentiality: Only the facts or advice considered as likely to be exempt from disclosure under the FOIA should be in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a **part 2** form – No

If yes, for what reason: N/A

ORIGINATING OFFICER DECLARATION:

Head of Unit: The Head of Strategic Finance and Resource Management has reviewed the request and is satisfied it is correct and consistent with the MOPAC's plans and priorities.	✓
Legal Advice: The MPS legal team has been consulted on the proposal.	✓
Financial Advice: The Chief Financial Officer has been consulted on this proposal.	✓
Equalities Advice: No Equality and Diversity issues identified.	✓

OFFICER APPROVAL**Chief Executive Officer**

I have been consulted about the proposal and confirm that financial, legal and equalities advice has been taken into account in the preparation of this report. I am satisfied that this is an appropriate request to be submitted to the Deputy Mayor for Policing and Crime.

Signature

R. Lawrence

Date 15/11/17

Modern Slavery Unit

Investment Advisory Board – November 2017

Report by ACSCO on behalf of the Commissioner

SUMMARY

In September 2016, Devon and Cornwall Chief Constable Shaun Sawyer, NPCC Lead for Modern Slavery (MS), and his team successfully bid into the Police Transformation Fund to support the introduction of a number of projects to improve the national policing response to MS.

The bid was to create seven national and regional units/functions, although the MPS will benefit from all of the aspects, The grant from Devon and Cornwall will fund the Regional Analyst post and the Triage Centre. The Regional Coordinator post will be recruited and funded directly by Devon and Cornwall.

Regional coordinator – Based on the ROCU model, a member of police staff with experience of MS investigations will be recruited directly to Devon and Cornwall Police. Their role will be twofold. Firstly to provide a link between the MPS, City of London Police and British Transport Police and provide consistent tactical advice and guidance around MS. Secondly to support the collation of data requests and intelligence requirements on behalf of the National Police Transformation Team.

Regional Analyst – One embedded analyst for the MPS will form part of the National Police Analytical Team to develop the evidence base around MS. They will regionally and collectively provide disruption and performance information in support of national and regional intelligence requirements.

MPS Triage Centre – 1 DS & 1 PC supported by 1 Home Office Immigration Enforcement (HOIE) officer – Of significant benefit to the MPS was the introduction of a Triage Centre to assist in processing National Referral Mechanism (NRM) and Duty to Notify (DtN) referrals. Administered by the NCA, NRM referrals are ultimately disseminated to policing for crime recording & assessment for further investigation. Under current arrangements, how forces manage those referrals differ significantly across England & Wales resulting in an inconsistent policing approach to the recording and management of MS referrals. The MPS receives by far the greatest volume of NRM referrals compared to any other force/region.

The Police and Crime Commissioner for Devon and Cornwall would like to collaborate with the Mayor's Office of Policing and Crime to provide the funding for the above posts to enable a detailed analysis of the function and operational effectiveness of a triage centre and regional analysts to be undertaken. The continuous learning from the MPS activity will be used to develop similar functionality across the rest of the UK.

The funding offer is:

Regional Analyst – £89,830, which includes 12.5% shift allowance.

Triage function DS - £83,897 reduced costs for 17/18 due to delays in staff recruitment.

Triage Function PC – £76,460 reduced costs for 17/18 due to delays in staff recruitment.

Additional transport and travel and supplies and services of - £13,925

This equates to £264,112 for the financial years 17/18 and 18/19.

Time sensitivity - A decision is required by Mid November 2017

Funding has been available since the full 2017/18 financial year. To maximise the benefit of the both the regional analyst & triage roles it is imperative a decision is secured at the earliest opportunity. Staff for all 3 roles have been identified. The triage staff will need to be requested through the MPS posting process which will add additional delay to the start of the pilot. In terms of modern slavery reports, over 25% of all allegations nationally are dealt with by the MPS. Having these roles in place are critical to enhancing our understanding of this crime type both within London, UK & internationally so we can tackle the issue effectively.

A. RECOMMENDATIONS - That the DMPC

- 1. Approves a collaboration with the Police and Crime Commissioner for Devon and Cornwall and the acceptance of funding of £264,112 funding for the establishment of the Triage Centre and the Regional Analyst post.**

B. SUPPORTING INFORMATION

1. Year on year offences of MS have seen a significant increase nationally. Within the MPS alone recorded offences have risen from 270 offences in 2015 to 1013 in 2016. That upward trend has continued into 2017. Despite this increase intelligence would suggest that MS remains a hugely under reported crime with an estimated 10,000 – 13,000 potential victims across the UK. MS is intrinsically linked to the wider aspects of Serious Organised Crime yet the true extent of the issue remains unclear.
2. The current NPCC lead for MS is CC Shaun Sawyer based in Devon and Cornwall.
3. In September 2016 Devon and Cornwall, successfully bid to the Home Office for funding through the Police Transformation Fund to ensure that police and partners reduce the vulnerability, threat and risk surrounding MS criminal activity, establishing nationally coordinated action, assessment, guidance and training. This bid created seven national and regional units/functions to achieve this aim. Although the MPS will benefit from all of the aspects, two of the functions, the Regional Analyst post and the Triage Centre, offer direct funding to the MPS for the creation of new posts and functions and a third, the Regional Coordinator post, will offer direct benefits to the MPS but will be funded within Devon and Cornwall.
4. The National Police Analytical Team will be managed by a National Senior Analyst supported by three National Analysts and two researchers alongside ten embedded Regional Analysts. The MPS under the PTF is being considered as a region for the purpose of this role. Together they will develop the evidence base around MS, provide disruption and performance information and support the reporting requirements for the Prime Ministers Task Force and the police response to the National Intelligence Requirement. The MPS regional analyst has been identified and will work to SCO36 – Met Intel. (£89,830 has been set aside from the PTF for the staff costs of this function, which includes a 12.5% shift allowance). The individual identified for this role already carries out a similar role within Met Intelligence although this is not dedicated exclusively to MS. The PTF funding will allow the MPS to task the analyst's time exclusively to MS & complete any national tasking received. At conclusion of the project the post holder will be considered for re deployment within SC&O. The re deployment will in accordance with MPS policy. Once the funding has ceased the analytical support will be provided within Met Intelligence. In addition the PTF funding also funds a national intelligence function which is the main generator of the actions for the analyst role, this additional demand will result in a significant reduction once the funding has ceased.

5. The regional coordinator function will provide tactical advice and guidance across the MPS, City of London Police and British Transport Police. In addition they will support the collation of data requests and intelligence requirements on behalf of the National Police Transformation Team. (This post will be directly funded and within Devon & Cornwall but will provide a direct benefit to the MPS).
6. The greatest challenge albeit the most likely to add the most significant value to the MPS has been the implementation of the National Referral Mechanism (NRM) Triage Centre. Although originally planned to form a national function, the PTF have agreed to run this as a pilot within the MPS, supported by Home Office Immigration and Enforcement; this is the primary purpose of the collaboration as the feedback into the national project is critical for the transformation of the policing response to MS.
7. The recording and reporting of MS offences is distinct from all other offences. The Independent Anti-Slavery Commissioner has recommended that every referral into the NRM must be supported by a corresponding crime report. As such the Home Office Counting Rules for MS have been amended according. Together with greater awareness this has resulted in a large increase in MS crime recording within policing, most notably within the MPS. Each referral requires initial gate-keeping and assessment, recording of the CRIS and potentially secondary investigation.
8. The case increase and inputting of crimes has become a huge burden upon the Modern Slavery and Kidnap Unit (MSKU) and has removed officers from their core responsibilities; impacting upon the high level of service victims of MS have come to expect from the MSKU. Over 60% of the MPS referrals have no UK footprint however there remains an expectation from the IASC, HO and NCRS that these offences will be recorded as crimes. Current responsibility for dissemination and transfer of these crimes to the relevant country also falls to the MSKU.
9. The Modern Slavery Act 2015 introduced a statutory duty to notify (DtN) for adult victims of slavery unwilling to enter the NRM process. These are notified to the Home Office who in turn notify the relevant police force; again involving a significant percentage with no UK footprint. The initial investigation of any DtN in order to establish issues such as victim safeguarding needs/wishes, investigative/intelligence opportunities can take 3-4 people days per referral due to the trauma and challenges victims face relaying their story.
10. The creation of the NRM triage centre within the MSKU takes into account the increasing volume of NRM/DtN's received by the MPS. Our experience has highlighted the need for an experienced MS investigator to conduct the initial enquiries and assess the threat, harm, risks and opportunities. This investment from the PTF will release the burden and provide consistency in the initial decision making.
11. The focus of the unit will be to receive all London centric NRM and DtN referrals. The team will be made up of Police and Home Office Immigration and Enforcement officers. The Triage Centre project provides an opportunity to fix the many inconsistencies that exist with the current process. With the establishment of the triage centre, every NRM/DtN referral will go through the same assessment process. The owning force/BCU would receive the referral together with guidance on the next steps to take. An intelligence pack containing relevant information held by HOIE/Visa and Immigration would also be provided. Additionally the triage centre would also process the allegations with no UK footprint. These would be forwarded to the International Crime Bureau for dissemination to the country where the offence took place. For the MPS this would potentially halve the number of referrals received.
12. Establishment of the triage centre within the MPS will not only have an immediate impact on the MSKU, freeing up resources to concentrate on live investigations and better servicing those referrals with a London footprint. It will create a stronger evidence base

for National Policing to understand the challenges and inconsistencies of the NRM/DtN process to influence changes required within the system and identify what else needs to be addressed. (£160,357 has been set aside for the officer costs from the PTF for this function).

13. DCS Michael Gallagher, head of the Organised Crime Command & with overall responsibility for the MPS Modern Slavery and Kidnap Unit has been consulted and is supportive of this proposal. He has appointed DCI Phil Brewer be the Senior Responsible Owner (SRO) for the triage centre project and implementation and has confirmed he is happy for it to be hosted within SCO7 alongside existing MPS Modern Slavery and Kidnap Unit. As the MPS lead for MS he will maintain responsibility for the effective oversight of the regional coordinator and analyst roles.
14. Therefore the request is the MPS supports the transfer of Modern Slavery PTF money secured by Devon and Cornwall to establish the Regional Analyst function along with the establishment of the MPS triage centre pilot incorporating 1 DS, 1 PC and 1 HOIE officer (either embedded or working remotely).
15. The added benefit to both the MPS in its fight to tackle vulnerability linked to MS in the capital and National Policing and partners to increase the understanding and reduce the vulnerability, threat and risk surrounding MS criminality.

C. OTHER ORGANISATIONAL & COMMUNITY IMPLICATIONS

Equality and Diversity Impact

1. Equalities considerations have been taken into account particularly concerning the support of vulnerable and diverse communities/victims who are at greatest risk from MS.

Financial Implications / Value for Money

1. The original approval from the Modern Slavery Police Transformation Fund, agreed a grant of £264,112 (£86,385 2017/18 and £177,727 2018/19) which would be utilised to fund 3 FTE (2 officers and 1 staff) as well as relevant support and overhead costs. In addition further funding will pay for one post from HOIE in support of the Triage Centre and one regional coordinator function benefitting the MPS but directly recruited by Devon and Cornwall. This will establish the two regional roles and the NRM Triage Centre within the MPS. The Modern Slavery Police Transformation programme is funded by the Police Transformation Fund grant. Under the terms of this grant the MPS will be reimbursed for actual staff costs, and there are no financial pressures for the MPS.
2. The funding requested is as follows;

Capital lines of expenditure	2017 / 18	2018 / 19	Total
Total Capital	0	0	0
Resource lines of expenditure	2017 / 18	2018 / 19	Total
Detective Sergeant - Triage centre	20,974 (4mths)	62,923	83,897
Police Constable - Triage centre	19,115 (4mths)	57,345	76,460
Regional Analyst – Band D	41,921 (10.5mths)	47,909	89,830
Transport and travel	2,834 (4mths)	6,550	9,384
Supplies & Services	1,541 (4mths)	3,000	4,541

Total Resource	86,385	177,727	264,112
Total funding sought (resources and capital)	86,385	177,727	264,112
Uplift requested through Devon and Cornwall	86,385	177,727	264,112

3. The creation of these roles and functions will not impact on MPS budgets as all additionality and allowance for support costs and overheads are included in the funding offer. If the collaboration is not approved, although that equally will not impact upon MPS budgets it will impact upon our effectiveness against a national and ministerial priority and the MOPAC priority to protect vulnerable people. Implementation of these posts will enable the MPS to have significant influence over the national approach to tackling MS and reduce the inconsistencies currently faced in the recording and reporting of these offences.
4. Paragraph 9.6 of the MPS Financial Regulations states all agreements for the provision of services to other organisations will be on a basis of full cost recovery, except with the specific approval of MOPAC. The terms of the Home Office grant only allow for the direct costs of the staff employed, travel costs and any supplies and services to be claimed. Although this does not constitute full cost recovery, as it excludes our normal support costs, the MPS will benefit from the creation of the posts.

4. Legal Implications

1. S22 of the Police Act 1996, as amended by Section 89 Police Reform and Social Responsibility Act 2011 allows the MOPAC, as the local policing body, in connection with the discharge of any its functions to enter into a collaboration agreement.
2. The MOPAC Scheme of Delegation at Clause 4.5 requires the Deputy Mayor for Policing and Crime to approve all collaboration agreements where the Act requires. As this is a policing body collaboration, it is required.
3. There will be a written agreement between the MOPAC and the PCC for Devon and Cornwall to formalise the arrangement. The agreement will be published under the Elected Local Policing Bodies (Specified Information) Order 2011.

Risk (including Health and Safety) Implications

Health and Safety

1. MPS Modern Slavery and Kidnap Unit will continue to work with the MPS Safety and Health Risk Management Team (and other agencies as appropriate) to ensure that all significant H&S risks have been quantified, and that suitable and sufficient controls are in place aimed at mitigating the risk to the MPS as follows:
 - a) Compliance with health and safety at work statutory provisions including codes of practice
 - b) MOPAC/MPS Safety Management System and
 - c) Service delivery that may impact public, officer or staff safety

Risks

1. Without approval to secure this collaboration, and financial provision, between Devon and Cornwall and MOPAC there is significant risk that the current rate of increase for NRM/DtN referrals into the MSKU will render the unit ineffective in its responsibility for dealing with vulnerable victims of MS; effectively becoming a full time crime recording and assessment unit.
2. The police triage centre could provide a central solution to a problem that is emerging for all forces acting as a proof of concept and evidence base to influence change in the approach to the NRM/DtN rather than anecdotal.
3. The NRM may change in a range of ways but regardless of these a central entry point to policing will be essential in order to guarantee a) a stronger initial investigation for all referrals and b) reduce the burden in investigative units in all forces (but particularly the MPS) of initial enquiries that can be more efficiently carried out centrally.
4. Not to establish this function alongside already agreed agency staff to reduce the recording burden will create an unacceptable risk in terms of delayed recording, assessment, investigation and safeguarding of vulnerable victims of MS.

Environmental Implications

Not applicable

Report author: T/Detective Chief Inspector Phil Brewer
SCO7(1) Modern Slavery and Kidnap

Supporting Documents: