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Chair of the Police and Crime Committee



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Sophie Linden
Deputy Mayor for Policing and Crime
MOPAC
(Via email)

29 January 2020

Dear Sophie

Modern slavery and human trafficking in London

Modern slavery and human trafficking is a significant problem affecting London; the challenge London faces with modern slavery and human trafficking is unique, and considerably greater than in any other region of the UK. The Home Office's 2018 Annual Report on Modern Slavery shows that of the 5,143 people referred to the National Referral Mechanism (NRM) for crime recording purposes in 2017, more than 30 per cent of cases were in London alone – almost three times that of any other region or country in the UK. Data from the Metropolitan police (the Met) shows that in 2013, 187 referrals for modern slavery and human trafficking were made in London. By 2018 that figure rose to 2,346 – a 1,154 per cent increase over five years.

The Home Office estimate that there are between 10,000 and 13,000 modern slaves living in the UK at any one time.¹ However this estimate does not account for developments in definitions of, and means of identifying, victims of modern slavery.

The global slavery index for 2018 calculated that there were likely around 136,000 people living in modern slavery in the UK.² In London specifically, the charity Hestia estimates that there are at least 4,300 victims of modern slavery and human trafficking in London.³ However, the reality is that there may be thousands more unknown victims of modern slavery and human trafficking in the capital.⁴

¹ Home Office, [Policy Paper: Modern Slavery Strategy](#), November 2014

² The Global Slavery Index, [Global Slavery Index 2018 - Country Studies: United Kingdom](#).

³ Police and Crime Committee, Hestia Written Submission, October 2019 (P.3)

⁴ Police and Crime Committee, Hestia Written Submission, October 2019 (P.3)

In October the Local Government Association reported that, nationally, the number of referrals for suspected child victims of modern slavery and human trafficking had risen by 807 per cent between 2014 and 2018. It is likely that a great proportion of those referrals are made in London.

We recently looked at London's response to this problem by examining the effectiveness and impact of the London Modern Slavery Partnership Board (LMSPB), the sufficiency of resources and training available to the Met; and explored the sufficiency of victims' support in London. We spoke to Paul Wylie, Director of Strategy at MOPAC, Phil Brewer, Head of the Specialist Crime and Vulnerabilities Unit at the Met, Tamara Barnett, Head of Office for the Human Trafficking Foundation and Marissa Begonia, Co-ordinator for the Voice of Domestic Workers, a charity that supports domestic workers who are victims of human trafficking and modern slavery.

We were impressed by the dedication and commitment of those working to directly confront human trafficking and modern slavery and to provide support to victims. Their experience of working with victims and the information they have gathered about how they are dealt with has been very useful to the Committee in forming its recommendations. The Committee believes that there are still significant challenges relating to the approaches taken in London to tackling modern slavery and human trafficking, as well as providing support to victims and survivors.

The Committee acknowledges the Mayor's recognition of modern slavery and human trafficking as a horrendous crime, affecting the most vulnerable people in society, and welcomes the inclusion of a dedicated section in the Police and Crime Plan 2017 - 2021.⁵ The Mayor's support for anti-modern slavery campaigns in London should also be commended, particularly his backing of the Evening Standard's modern slavery campaign.⁶ The Mayor's Good Work Standard also provides a useful benchmark for business in London to avoid inadvertently utilising victims of modern slavery and human trafficking.

However, despite these good measures we are concerned that more needs to be done, which is why we make the following recommendations:

1. The Mayor should task the London Modern Slavery Partnership Board with developing a coherent strategy for modern slavery to give it clarity of purpose and help drive forward partnership work.

The Committee commends the Mayor and the Deputy Mayor for establishing the London Modern Slavery Partnership Board. It is the Committee's view that such a body holds great potential to develop the cross-sector partnerships and approaches needed to actively combat the scourge of modern slavery and human trafficking in London.

But we feel it is vital that the Mayor takes decisive action to improve London's response to modern slavery and human trafficking. It is the Committee's view that the most effective means of doing so is to establish a place-based strategy for London. Such a strategy must account for London's unique characteristics.

⁵ GLA, [London Modern Slavery Partnership Board](#), N.D

⁶ <https://www.standard.co.uk/news/modern-slavery/sadiq-khan-backs-evening-standards-modern-slavery-campaign-amid-crackdown-on-building-site-a3674501.html>

London's strategy should consider how victims can access adequate accommodation at all stages of their NRM journey, as the lack of accommodation often results in victims, particularly male victims, living on the streets. Hestia report that in 2019, 54 per cent of male survivors and 5.2 per cent of female survivors they supported had a history of homelessness.⁷ We heard from Tamara Barnett as an example of good practice, that West Mercia and Thames Valley Police and Crime Commissioners have funded pre-NRM accommodation for homeless potential victims of modern slavery.

Any strategy for London must effectively utilise the expertise and resources available in London, as well as be long-term, with a view to embedding the frameworks needed to identify and prosecute perpetrators and support victims of modern slavery and human trafficking.

The Committee is concerned that without an overarching London strategy the London Modern Slavery Partnership Board lacks focus and definition. We commend the example of a strategy produced by the Hertfordshire Police and Crime Commissioner, David Lloyd, that sets out clear priorities and objectives⁸.

We heard from Paul Wylie that he does not feel a specific strategy is necessary as modern slavery is included in the Mayor's Police and Crime Plan, but Phil Brewer told us: *"This is something that I am absolutely passionate about, as you probably know. I think within policing, there needs to be a culture change on so many levels. We (London) account for a third of all NRM referrals. ...I would expect we will see ... around 3,800 referrals this year. ...I think it (a London strategy) would set us on the right road in terms of what we need to do to have the right policies in place and ensure that we have the right partners around the table to work with us, because, as we have said several times, this is not just a policing issue. If you are going to look at tackling modern slavery properly, you need that coherent approach across so many different sectors. That is probably where the co-ordination is most needed."*

In addition, Tamara Barnett said:

"We would welcome some sort of strategy. We often say in our sector that we are where domestic violence was 25 years ago. We are now at the cusp where it is not quite understood and not quite recognised for the terrible, heinous crime it is. Therefore, I think a strategy could be very useful. We have quite a lot of challenges. There is some very good practice, ...but at a borough level I think there are some serious challenges."

The third guest, Marissa Begonia, also endorsed having a London strategy. These comments lead the Committee to believe that a London strategy is required to deal with the sheer scale of London's challenge, its specific concerns and issues with a clear, coordinated approach that is transparent and promotes understanding and awareness.

⁷ <https://www.hestia.org/undergroundlives>

⁸ <https://www.stopexploitationherts.org.uk/media/docs/hmsp-strategy-2018-2021.pdf>

2. The Committee recommends that the Mayor puts in place an independent review of the board’s effectiveness and impact in helping achieve better outcomes for victims of modern slavery.

We recommend that an independent review is undertaken of the LMSPB, its work to date and impact. This could help provide focus for the Partnership Board as well as inform the development of a London strategy for modern slavery. We heard from Paul Wylie that he thought this was a good idea and would help ensure that the Board is not duplicating work going on elsewhere:

“we have to make sure that we are adding value to the good work that other people are doing rather than just duplicating, which is the real danger in this space.”

3. The Committee recommends the Mayor instructs the Board to develop, and regularly publish information that facilitates and promotes public awareness of the role the Board plays in supporting anti-modern slavery and human trafficking efforts in London, as well as what impact it has had to date. The Committee recommends that the Board should make publicly available as soon as possible (no later than end February 2020):

- **The Board’s Terms of Reference – including timeframes for review;**
- **More comprehensive minutes of meetings, as well as actions agreed and timeframes for delivery on actions; and**
- **The list of modern slavery ambassadors at borough level.**

The Committee feels it is important that the Mayor acts to ensure that the Board, which receives public finances to carry out its function, is held to a high standard of public accountability. The Board should also make every effort to publicise and promote its work as part of the drive to raise awareness and knowledge of modern slavery, how to recognise it and who to contact if it is suspected. The lack of publicly available information risks underplaying this important issue and does not promote awareness.

The Committee values the Met’s introduction of Single Points of Contact (SPOCs) for modern slavery and human trafficking in borough command units to provide an optimised approach to reporting and responding to suspected cases of modern slavery and human trafficking. Two years ago, the Mayor promised to provide modern slavery ambassadors for each borough and the Deputy Mayor for Policing and Crime told us that the SPOCs are these ambassadors. The Committee recommends that more is done to promote these roles and ensure the contacts are widely known at borough level. The list needs to be maintained and updated regularly so that all contacts are valid.

The Committee feels that a key benefit of such publicly available information, would be to increase public and stakeholder awareness of and support for City Hall’s position and efforts to tackle modern slavery and human trafficking.

4. The Met should ensure that more detectives are assigned to the Specialist Crimes and Vulnerabilities Unit to improve its response to, and investigation of, human trafficking and modern slavery.

The Committee is aware of actions taken by the Met to tackle modern slavery more effectively, including the reformation of the Modern Slavery and Kidnap Unit into the Specialist Crimes and Vulnerabilities Unit to better deploy resources and expertise across crimes with similar vulnerabilities. Other police forces often call upon the expertise of the Unit.

It is also helpful that the Met's Business Plan contains commitments to review its approach, skills and capabilities to tackle threats like modern slavery and human trafficking. However, the Committee notes that despite the provisions in its Business Plan, and the broader national effort to tackle modern slavery and human trafficking, rates of prosecution for the crime remain considerably lower than they should be in the context of the rising rate of suspected victim reporting.

Nationally, police forces have faced criticism for their handling of modern slavery and exploitation. Hestia submitted in March 2019 a 'super-complaint' on modern slavery to Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) due to police failings in their response to victims of modern slavery, which Hestia argues have hindered the prosecution of traffickers and exploiters.^{9 10 11} It highlighted that despite a 250 per cent increase in the number of modern slavery operations reported by UK police forces, prosecution rates for the crime remain low – seven per cent of recorded cases are referred to the Crown Prosecution Service. They also highlight failings in police handling and protection of victims as causes for their super-complaint.¹² The work of specialist officers in the Met received praise but inconsistency across the force was identified. In July Her Majesty's Chief Inspector of Constabulary and senior representatives from the Independent Office for Police Conduct (IOPC) and the College of Policing assessed the super-complaint as being eligible to be investigated.¹³

We heard from Phil Brewer that the Specialist Crimes and Vulnerabilities Unit has a significant shortfall in detectives - around 34 per cent. We are aware that the Met has a shortage of detectives across the force that is impacting on other investigative services. But we recommend that securing the full allocation of detectives to the Unit should be made a priority to allow them to fulfil their function properly and effectively.

5. The Met should work with the College of Policing to ensure a proper training package is in place for frontline officers.

The Committee heard in the meeting that the 45-minute online training package on modern slavery that frontline officers receive is insufficient to equip them to identify victims or potential victims. Face to face training needs to be given to ensure officers fully understand the issues and how they should engage with victims/potential victims. Frontline officers will often be the crucial contact for victims, so it is very important that they are able to respond

⁹ The police super-complaint system allows designated organisations to raise issues on behalf of the public about harmful patterns or trends in policing - <https://www.gov.uk/government/collections/police-super-complaints>

¹⁰ Hestia, [Press Release: Police response to modern slavery victims hinders prosecution of traffickers](#), March 2019

¹¹ In 2018 there was a 250 percent increase in modern slavery operations by the Met

¹² Hestia, [Press Release: Police response to modern slavery victims hinders prosecution of traffickers](#), March 2019

¹³ HM Inspectorate of Constabulary and Fire & Rescue Services, [Police super-complaints: police response to victims of modern slavery](#), July 2019

appropriately and effectively. The Committee heard from Tamara Barnett that more training was required at a local level and she referred to a lack of knowledge of civil orders that could be imposed on perpetrators to keep them away from victims. She said: *“the number used since they were introduced quite a few years ago is very, very low. That is partly because most police and local authorities and others have no idea they even exist.”*

Phil Brewer also acknowledged the inconsistency of training and knowledge telling the Committee:

“I have seen examples where two victims, within days of each other, have approached police within the same borough. One was treated brilliantly with a first-class response and the other was not.”

He endorsed Tamara’s view and said it was important to work with partners on a local level to deliver training to build awareness and knowledge of modern slavery.

6. The Mayor should contact other metropolitan Mayors and the London Victims Commissioner to build a coherent case to lobby the Home Secretary:

- **to reform the National Referral Mechanism (NRM) to achieve more positive outcomes;**
- **provide longer post-NRM support for victims or potential victims of trafficking and modern slavery;**
- **cease the use of immigration detention for victims/potential victims;**
- **ensure use of temporary leave to remain for victims/potential victims of trafficking pending decisions on their case; and**
- **review current visa system for domestic servants that ‘ties’ them to individual employers when they are identified as victims/potential victims of trafficking.**

NRM data shows that the number of referrals has risen year on year as has the number of pending cases, but the proportion of positive outcomes has been declining. In 2013 47.8% of referrals received a conclusive decision, in 2018 this figure fell to 16.45%. Furthermore, data provided to another FOI request revealed that between 2016 and 2017 the number of potential victims bypassing the NRM doubled from 776 to 1670.

We also heard that victims are being re-trafficked and re-referred to the NRM as post-NRM support is not sufficient to protect individuals, so making victims susceptible to being re-trafficked and re-referred to the NRM.

The Committee also heard worrying evidence that potential victims of trafficking are being detained under immigration powers rather than being helped or referred to support services. In 2018 507 people in immigration detention had received a positive decision of having reasonable grounds in their trafficking case before or during their detention (data provided in response to FOI request). The likelihood of detention and being deported is a strong deterrent to victims to come forward and leads to individuals fleeing servitude ending up on the streets as homeless.

As trafficking has a significant impact on all metropolitan areas we recommend a joint approach with other metropolitan Mayors and with the London Victims Commissioner to add weight to the case for change with the Home Secretary.

We hope you find our findings and recommendations helpful. We would appreciate a response to each specific recommendation, setting out how you will implement each one, by 1 March 2020.

Yours sincerely,

A handwritten signature in black ink that reads "Unmesh Desai". The signature is written in a cursive style with a horizontal line underneath the name.

Unmesh Desai AM
Chair of the Police and Crime Committee