

For Information	
Public	
Report to:	OPCC Strategic and Performance Work Programme
Date of Meeting:	4th November 2020
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Agenda Item:	4

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Modern Slavery

1. Purpose of the Report

- 1.1 The purpose of this report is to update the Nottinghamshire Office of the Police and Crime Commissioner (OPCC) with regard to Nottinghamshire Police's performance and response to modern slavery.

2. Recommendations

- 2.1 It was recommended that the Police and Crime Commissioner notes the summary of key points set out at chapter 4 of this report.

3. Reasons for Recommendations

- 3.1 To ensure that the Police and Crime Commissioner is updated on this area of business and is provided with the relevant assurance around the Force's performance relating to tackling modern slavery.

4. Summary of Key Points

- 4.1 In May 2020, the force's Modern Slavery (MS), Human Trafficking and County Lines (MSHT&CL) team was relocated from force Intelligence to the Serious and Organised Crime Unit (SOCU) to align better to the national strategy. With SOCU already responsible for the policing of commodity and prosperity, it was appropriate for the department to assume responsibility for tackling the third strand of vulnerability in which MSHT&CL falls (notwithstanding that child sexual exploitation (CSE) remains the preserve of Public Protection).
- 4.2 The force's policing of SOC now aligns to the National Crime Agency (NCA) National Control Strategy (NCS) 2020/21 in delivery of a single whole system approach to tackling high harm and high impact criminals and Organised Crime Groups (OCGs) across the national identifiable strands of commodity, prosperity and importantly insofar as this report is concerned, vulnerability, specifically MS exploitation.

- 4.3 75 MS crimes were recorded by Nottinghamshire Police and 149 National Referral Mechanism (NRMs)¹ were received by the force during the period 1st April 2019 and 31st March 2020. By exploitation type they can be broken down as follows:

Exploitation Type	Crimes	NRMs
Forced Labour	23	38
Sexual Exploitation	3	23
Criminal Exploitation	42	72
Domestic Servitude	3	6

- 4.5 Dealing first with MS recorded crime, of the 42 occurrences recorded for criminal exploitation, 23 [54%] related to offences intrinsically linked to County Lines (CL) offending. This reflects the proliferation of drugs trafficking offending adopting a CL model and such abuse now exceeds labour exploitation that was once the MS area of primary concern.
- 4.6 Insofar as labour exploitation is concerned, 57% of offences featured Romanian persons vulnerable of trafficking (PVoT). When examining the countries of origin for injured parties, UK nationals accounted for the majority of victims [46%] with Romanian nationals second [22%]. Finally turning to the age of victims, 55% were over 18 and 45% were under 18 years of age.
- 4.7 Turning next to NRMs, 20 [13%] related to overseas exploitation, 28 [19%] related to exploitation outside Nottingham City and Nottinghamshire and thus 101 [68%] had an exploitation footprint that mapped to either the city or county. The vast majority of NRMs had a positive reasonable grounds decision² made by the single competent authority (SCA) at the Home Office. Akin to the recorded crime data, UK nationals accounted for the majority of victims [42%], followed by Romanian and Albanian nationals each standing at 9% of PVoT. Insofar as Albanian nationals are concerned, there was a 117% increase in PVoT compared to the previous 12 months, albeit the numbers were small [6 during 2018/19 and 13 during 2019/20]. This trend is expected to continue based on the number of Albanian nationals being identified from increased proactive policing operations engaged against cannabis cultivation sites during the COVID-19 pandemic lockdown period. Finally the age range of victims was between 2 and 69 years, with 54% over 18 and 46% under 18 years of age.
- 4.8 Within the 12 months under review (01/04/2019 to 31/03/2020), the 149 NRMs indexed to 17 separate agencies, with the 5 highest being as follows:

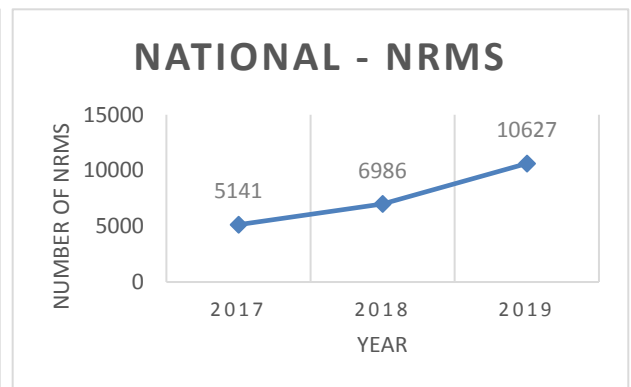
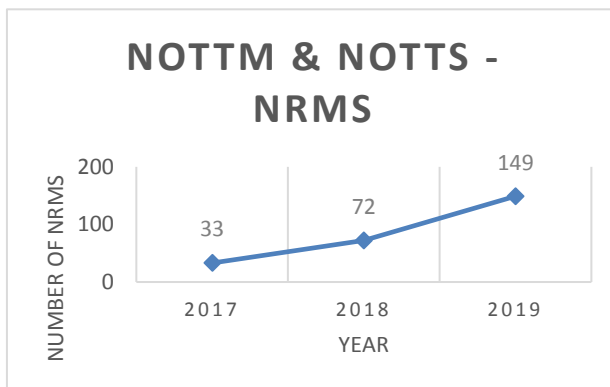
¹ UK's mechanism to identify, assess and support potential victims of modern slavery independent of any criminal investigation and can only be completed by a first responder. A NRM must be completed for all children that are suspected to be a victim of modern slavery. Adults must give their consent in relation to the NRM.

² A positive reasonable grounds decision means the victim has been accepted into the NRM and is entitled to a range of support, including a recovery and reflection period of a minimum of 45 days.

Agency	Referrals (c.)
Nottinghamshire Police	57
Home Office	30
Nottinghamshire County Council	17
Nottingham City Council	11
UK Visa and Immigration	7

4.9 MS offending recorded in Nottingham City and Nottinghamshire, continues to increase although this is in part attributable to a greater awareness of indicators to this crime type. Training has been delivered both within Nottinghamshire Police and across statutory partners and relevant third sector stakeholders to raise awareness of indicators to look out for. Over last 36 months the rate of increase in the number of NRMs for the city and county has been far greater than the national upward trend, as can be seen from the table and graphs below:

Area	2017	2018	Increase	2019	Increase
Nottm & Notts	33	72	118%	149	106%
National	5141	6986	35%	10627	52%



4.10 Whilst there is no distinct recording category for CL and most offending in compliance with the Home Office Counting Rules (HOCR) and National Crime Recording Standards (NCRS), is recorded as drugs supply, the increase in intelligence reports directly indexing to CL activity shows that offending known to the force is increasing. In summary between the 2018/19 and 2019/20, intelligence reports indexed to CL increased by 54%.

4.11 The activity of the team is scrutinised quarterly by the force's Safeguarding Adults Scrutiny Board chaired by the Assistant Chief Constable Crime and Operations. At the previous meeting, the MSHT&CL had 88 recorded occurrences open to investigation with 26 live operations representing complex investigations. At the date this report was authored, the number of operations had increased by 1.

4.12 The Head of SOCU chairs the monthly Nottingham City Slavery and Exploitation Risk Assessment Conference (SERAC) with multi-disciplinary membership comprising statutory partners and the third sector. This provides a structure where professionals can refer known or suspected victims of

exploitation so that there can be a multi-agency response. Between 1st April 2019 and 31st March 2020, 109 cases were considered by the group and appropriate disruption and safeguarding actions were taken where applicable. The Home Office Modern Slavery Unit has reviewed this model and is considering whether it should be endorsed as best practice.

- 4.13 The force has begun dialogue with the MS lead at Nottinghamshire County Council with the objective for establishing an SERAC for the county, which as a pilot may serve the boroughs of Rushcliffe, Broxtowe and Gedling. This will undoubtedly increase demand, but will provide a benefit to the communities of enhanced safeguarding.
- 4.14 On 12th August 2020 the National Police Chiefs' Council (NPCC) MS and Organised Immigration Crime Programme (MSOICP), published a national report. The report highlighted that when the rates of cases referred to the Crown Prosecution Service per 100,000 of the population were taken into consideration, out of the 43 police forces of England and Wales, Nottinghamshire Police were the 5th highest in terms of the number of charges granted and non-charges directed (i.e. cases referred to the prosecuting authority).
- 4.15 When the team was established, the SOCU Senior Leadership Team undertook an internal review to determine how best to efficiently and effectively police the increasing demand in MS. This resulted in a terms of reference being redrawn for the MSHT&CL team's operational activity. The previous conflation of the separate disciplines of MSHT and CL was terminated and separate operational responses with dedicated resourcing has been established. This distinction parallels with national strategic governance in that policing of MSHT and CL is coordinated by two separate NPCC portfolios.
- 4.16 The number of force resources assigned to policing both MSHT and CL is currently based on professional judgement, formed over a number of years, after an MS team was established in 2017 with a primary focus on safeguarding (over investigation). As part of the force's business planning cycle, within the SOCU's recent annual departmental assessment (ADA), a proposal was made for demand analysis be undertaken so that an evidence base could inform the future establishment required to police both MSHT and CL. This proposal was accepted by the Chief Constable and that demand analysis will be commissioned in due course.
- 4.17 In September 2020, the Professionalising Investigations Programme level 2 (PIP2) investigative capacity of the force's response to MSHT was increased through the force's *Career Pathways* programme. Furthermore, on 12th October 2020, there will be an uplift of an additional Detective Sergeant (DS) thus allowing for separate supervision of the force's response to MSHT and CL. Finally SOCU have recently undertaken a round of recruitment for police constables (PCs) to form a proactive team focused on the disruption of CL offending across the spectrum of prevention and pursuit; their release from the Local Policing command is now pending.

- 4.18 Continuing on the theme of resourcing CL policing, a joint business case formulated the Crime and Operational Support command and Local Policing command has been agreed to create 2 Child Criminal Exploitation (CCE) Coordinator police staff posts, 1 for each of the 2 policing divisions. Their primary duty will be to act as single points of contacts for Children's Social Care and other key partners across the sector in providing for a joint safeguarding response to children involved in drugs trafficking, knife crime, most serious violence and gangs who are often being exploited by adult criminals and OCGs. These dedicated Coordinators will provide continuity of police representation at both multi-agency CCE strategy meetings and the monthly Nottingham City and Nottinghamshire Child Criminal Exploitation Panels.
- 4.19 In August 2020, Nottinghamshire Police began scoring the risk posed by all known and mapped CLs active across Nottingham City and Nottinghamshire. These are scored using the Management of Risk in Law Enforcement assessment tool and allows the SOCU to prioritise its resources across the strands of vulnerability, prosperity and commodity. Details of risk assessed CLs are shared with both the East Midlands Special Operation Unit and the NCA.
- 4.20 Strong partnerships exist in the SOCU's policing of MS. In addition to the multi-agency Nottingham City SERAC arrangements, the force is an integral member of the Nottingham and Nottinghamshire Modern Slavery Board, chaired by the Chief Executive for Newark and Sherwood District Council. It is through this Board that the University of Nottingham Rights Lab was commissioned to produce the MS problem profile³ for Nottingham City and Nottinghamshire. During August 2020, four workshops were held across the following themes:
- (a) Assets, accommodation and survivor support
 - (b) CCE and CL
 - (c) Emerging threats and trends
 - (d) Communicating with communities
- 4.21 Having participated in these workshops, NNMSB members are currently considering a range of activities across the spectrum of prepare, protect, prevent and pursue, which can combat MS in Nottingham City and Nottinghamshire.
- 4.22 In summary, the Force continues to adapt and develop its approach to tackling modern slavery and human trafficking. Greater awareness of indicators by officers and staff has led to an increase in recorded offences, meaning that we are going even further in our fight against these crimes, protecting the most vulnerable people, bringing people to justice and being able to support victims and witnesses. Strong partnership working underpins our approach ensuring that all agencies are aligned and working together to problem solve complex modern slavery crimes.

³ Police data was used to inform the Nottingham City and Nottinghamshire modern slavery problem profile.

5. Financial Implications and Budget Provision

- 5.1 The budget for the team sits within the SOCU budget managed by the head of department with an appropriate Finance business partner support. Police staff, non-pay and replacement hardware from MSHT&CL are all managed from the SOCU budget. Police officers are managed within a wider Force budget. There are no relevant matters to report to the Strategic Performance and Work Programme.

6. Human Resources Implications

- 6.1 Any increase in the police officer establishment of the MSHT&CL team will be informed by an evidence based approach, delivered through demand analysis and any future proposal as to uplift will be considered by the Force Executive Board. Release of any resources into the SOCU from other force departments will be authorised and coordinated by Tactical Workforce Planning.

7. Equality Implications

- 7.1 The SOCU has a Representation (Diversity and Inclusion), Attraction, Recruitment, Progression and Retention (RARPR) strategy. The department strives to increase its establishment of officers and staff who identify with minority protected characteristics, in order to be more reflective of the communities it serves.
- 7.2 The Code of Ethics is central to all decisions taken in the policing of MS. The SOCU acts with fairness and impartiality and does not discriminate unlawfully or fairly.
- 7.3 Article 3 of the European Convention on Human Rights (ECHR) provides for the prohibition of torture. Nottinghamshire Police has a positive obligation to ensure that no one shall be subject to torture or to inhuman or degrading treatment or punishment.

8. Risk Management

- 8.1 Any risks associated with this area of business are assessed and scored appropriately. They are managed by the T/Detective Superintendent head of department.

9. Policy Implications and links to the Police and Crime Plan Priorities

- 9.1 The four main strategic priorities of the Nottinghamshire Police and Crime Plan 2018 to 2021 are central to the policing of MS, specifically (i) protecting people from harm, (ii) helping and supporting victims, (iii) tackling crime and antisocial behaviour, and (iv) transforming services and delivering quality policing.

10. Changes in Legislation or other Legal Considerations

10.1 In the last 12 months, there have been no changes to statutory legislation proscribing against MS. The key primary legislation remains the Modern Slavery Act 2015.

11. Details of outcome of consultation

11.1 There has been no consultation in relation to this report because it is for update purposes only.

12. Appendices

12.1 None.