

# Nottingham and Nottinghamshire Partnership Profile

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## Modern Slavery in Nottingham and Nottinghamshire

Understanding Prevalence, Risk and Victim Need

Live Document

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## Executive Summary

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**‘Modern Slavery is both an extremely serious crime and a grave violation of human rights and human dignity which exists in a wide variety of brutal forms. It is estimated to be one of the world’s most profitable criminal activities and is driven by two primary factors – high profits and low risk. This paradigm must be turned on its head’**

*Kevin Hyland OBE, Independent Anti-Slavery Commissioner<sup>1</sup>*

In 2015, the Modern Slavery Act brought forward a range of measures to improve the UK response to Modern Slavery which included increasing the maximum sentence available for Modern Slavery offences to life imprisonment, introducing a statutory duty for public bodies to notify the National Crime Agency of all potential victims of slavery and introducing new powers, duties and provisions for partner agencies in tackling the issue.

This document aims to support and inform the response to modern slavery amongst local partner agencies across Nottingham and Nottinghamshire by exploring the prevalence of Modern Slavery within and impacting upon the area, developing our understanding of the impact of modern slavery and highlighting some of the tools, powers, opportunities and intervention.

### Key Messages

- Extrapolations from national estimates indicate that there could be in the region of 133 to 172 potential victims of modern slavery within Nottinghamshire
- By contrast, only 7 crimes, 13 National Referral Mechanism (NRM) Referrals and 21 incidents were recorded in the area in 2015. This indicates a priority knowledge gap
- Referrals to the UK Human Trafficking Centre are lower than average in Nottinghamshire, but increasing. Our understanding of the local picture is improving.
- Levels of intelligence and identified offences are expected to increase over the coming year as a result of proactive local activity, increases in local awareness and national profile
- This is likely to have resourcing implications for agencies with responsibilities for enforcement and supporting vulnerable victims
- Police intelligence suggests that modern slavery is likely to be present across all local authority areas in Nottinghamshire
- There is a recognised need to improve the partnership structures in place for identifying and responding to modern slavery, raise awareness and improve data sharing among agencies
- There are opportunities to develop local capacity to support victims of modern slavery, particularly via faith networks in the area
- There are also opportunities to develop a more coherent regional / cross border response to modern slavery in partnership with other agencies and services

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<sup>1</sup> Independent Anti-Slavery Commissioner – Strategic Plan 2015-2017

## Introduction

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### What do we mean by Modern Slavery?

Modern Slavery is a worldwide issue which transcends age, gender and ethnicities. It can include victims that have been brought from overseas and vulnerable people in the UK being forced to illegally work against their will<sup>2</sup> for little or no pay with restricted freedom of movement and substandard working or living conditions. The term Modern Slavery includes but is not limited to:

- **Forced labour** - victims forced to work against their will, often working very long hours for little or no pay in dire conditions. This can include 'debt bondage' where victims are forced to work to pay off debts that realistically they never will be able to
- **Forced criminality** - victims forced into crimes such as cannabis cultivation or pick pocketing against their will - often being controlled and maltreated
- **Sexual exploitation** - victims forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography
- **Child trafficking** - young people (under 18) moved either internationally or domestically so they can be exploited
- **Domestic servitude** - victims forced to carry out housework and domestic chores in private households with little or no pay, restricted movement and limited free time or privacy

### Aim and Objectives

The Modern Slavery Act 2015 brought forward a range of measures which aim to make the UK a riskier place for exploiters to operate, better safeguard vulnerable victims and ultimately improve the way agencies work together to tackle Modern Slavery.

**This document aims to support and inform the response to modern slavery amongst local partner agencies across Nottingham and Nottinghamshire by:-**

- a) Exploring the prevalence of Modern Slavery within and impacting upon the area by consolidating information available locally, nationally and internationally;
- b) Developing our understanding of the impact of modern slavery by profiling the threat, risk and harm that these activities present in the area; and
- c) Highlighting some of the tools, powers, opportunities and interventions available in response to Modern Slavery.

The profile also aims to support the work of Nottinghamshire Local Organised Crime Partnership Board and help to inform the areas' Serious and Organised Crime Local Profiles to ensure that all available information and powers are brought to bear locally against serious and organised crime.

It is the aspiration that this profile and subsequent action plan will be jointly owned by all co-operating bodies and act as a catalyst for closer partnership working in response to Modern Slavery.

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<sup>2</sup> <https://modernslavery.co.uk/>

## How prevalent is Modern Slavery in Nottinghamshire?

Modern slavery remains a largely hidden crime of which the true scale of cases occurring within or impacting upon Nottinghamshire remains unknown. The Home Office has estimated the scale of victimisation nationally to be in the region of 10,000 to 13,000 potential people within the UK<sup>3</sup>.

A simple population-based extrapolation of these prevalence estimates would indicate that **there could be in the region of 133 to 172 potential victims of modern slavery within Nottinghamshire**, however, this does not take into account of the demographic, geographic and economic factors<sup>4</sup> that may increase or decrease the likelihood of modern slavery occurring within the area.

### Factors with potential to influence the risk of modern slavery in Nottinghamshire

Geographic Factors	Demographic Factors	Economic Factors
Core city with well-established central <b>transport infrastructure</b>	Concentrated areas of local <b>deprivation and vulnerability</b>	Urban and rural concentrations of <b>low skilled unregulated labour markets</b>
<b>Road Network:</b> M1 serves as a major national arterial route through the county	<b>Eastern European economic migration</b> , incl. evidence of on-street prostitution	Regional concentrations of <b>agriculture horticulture labour markets</b>
<b>International migration</b> links via Nottingham East Midlands Airport	<b>Isolated traveller communities</b> located within the area	<b>Cheap accommodation</b> which can be easily sublet

Nationally, 3,266 potential victims of modern slavery from 102 different countries were referred to the UK Human Trafficking Centre via the National Referral Mechanism (NRM) in 2015. While this remains low compared to the estimated prevalence levels, NRM referrals increased by 40% nationally and more than doubled locally over the last year, indicating that **the picture is improving**.

While the number of identified cases involving the trafficking of human beings for labour and sexual exploitation remains low in the area, the risk from Organised Immigration Crime, Human Trafficking and Modern Slavery at a national level is widely recognised to be increasing<sup>5</sup>. Increases in labour exploitation, in particular, continue to be fuelled growth in migrants attempting to enter the UK illegally, while ongoing advances in technology and online communication continue to present new opportunities for those wishing to engage vulnerable people in modern slavery.

**NRM referrals per head of population remain below average in Nottinghamshire** compared to other police force areas nationally, however, it is important to note that this basic comparison does not take into account differences in the risk of modern slavery by area, severity of cases referred or outcome of referral<sup>6</sup>. Similarly, it is clear that areas in which dedicated units have been established in response to Modern Slavery (Cambridgeshire, West Yorks) typically display higher referral rates.

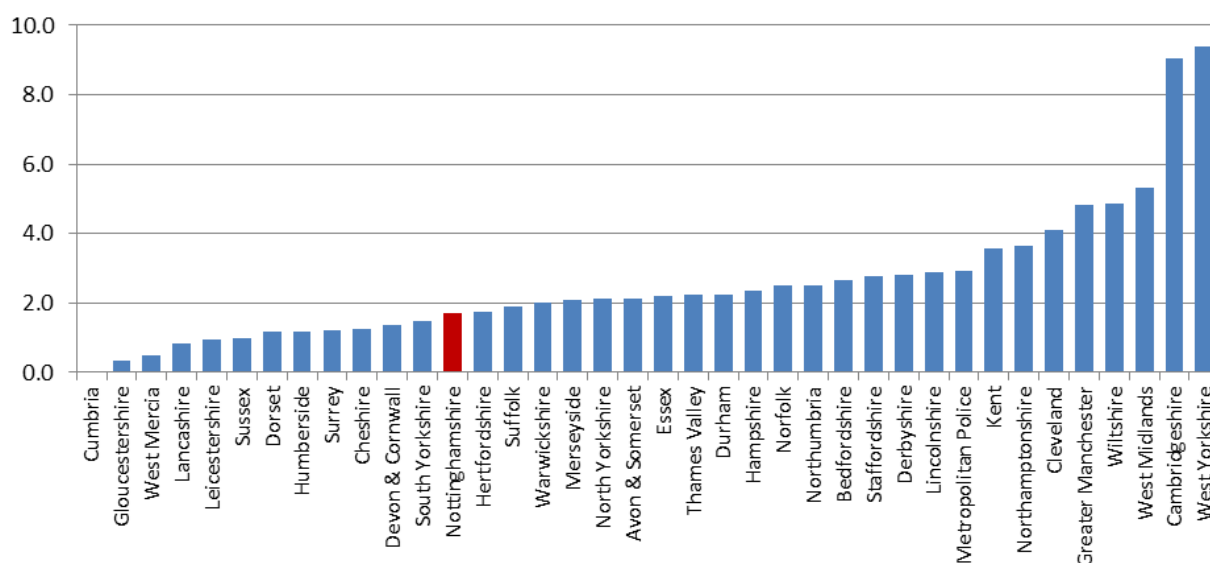
<sup>3</sup> Estimate based on number of potential victims of trafficking encountered by the authorities in 2013 – Modern Slavery: An application of Multiple Systems Estimation, B. Silverman, November 2014

<sup>4</sup> City of London / Metropolitan Police have significantly higher rates of referrals into the NRM than the majority of other police force areas nationally

<sup>5</sup> National Crime Agency, National Strategic Assessment of Serious and Organised Crime 2015 (23rd June 2015)

<sup>6</sup> Excluding cases pending a decision, only around 42% of NRM referrals nationally went on to receive a positive outcome in 2015.

**Police and Local Authority<sup>7</sup> Referrals into National Referral Mechanism 2014-2015 per 100,000 residents**



Nottinghamshire police and made 6 and 12 NRM referrals to the UKHTC in 2014 and 2015 respectively, with Nottingham City Council also making a referral in 2015. 7 Modern Slavery crimes<sup>8</sup> were recorded by Nottinghamshire police in 2015 with a further 21 incidents recorded in which victims wanted assistance escaping their circumstances but did not support a prosecution.

Of the crimes and incidents recorded by Nottinghamshire Police, the majority (70%-80%) were concentrated in Nottingham city. A review of the police intelligence picture, however, confirms that **modern slavery is likely to be present across all areas of Nottinghamshire**, with labour exploitation in particular appearing most widespread.

**Levels of intelligence and identified offences are expected to increase over the coming year as a result of proactive local activity, increases in local awareness and the increasing national profile<sup>9</sup>.**

<sup>7</sup> 2015 data only

<sup>8</sup> Modern slavery was introduced as a notifiable offence in April 2015

<sup>9</sup> An Independent Anti-Slavery Commissioner was appointed in in 2015 and the Modern Slavery Act received Royal Assent in April 2015

## Who is at risk of Modern Slavery?

The College of Policing [Authorised Professional Practice for Modern Slavery](#) states that: “Victims of can be poor, rich, children, adults, male, female, and of diverse nationalities, cultures, religions and sexual orientation. Often, victims of modern slavery may not appear to be vulnerable, or believe themselves to be a victim, but it is likely that they are”.

While the profile of modern slavery victims can vary significantly by exploitation type, all share a high degree of vulnerability on account of their financial, emotional or psychological dependency on those that exploit them – despite not always recognising their vulnerability. The following table provides an overview of the more common characteristics of modern slavery victims identified at a local and national level to date:-

**Fig 1. Factors most commonly linked to risk/victimisation<sup>10</sup>**

Victims	Types of Exploitation
<ul style="list-style-type: none"> <li>Women and children make up the majority of victims of sexual exploitation – predominantly Albanian, UK and Nigerian citizens</li> <li>Men are more commonly victims of labour exploitation, particularly Eastern European citizens – Vietnamese, Polish, Albanian and Romanian</li> <li>Vulnerable on account of issues such as homeless, unemployment, mental health or substance abuse needs</li> <li>Refugees, asylum seekers, members of the travelling community, missing persons, hitchhikers</li> </ul>	<ul style="list-style-type: none"> <li>Sexual Exploitation accounts for around 40% of reported cases nationally: Brothels, private residencies, street sex workers, night/strip clubs</li> <li>Forced Labour accounts for around 44% of reported cases nationally: Sectors including construction, hospitality, agriculture, food packaging, car washes,</li> <li>Domestic servitude accounts for around 16% of reported cases nationally: Victims identified are more commonly female (86%)</li> <li>Criminal Exploitation: Cannabis farms / factories, drug dealing, organised theft / pickpocketing</li> </ul>

Potential victims can be referred into the National Referral Mechanism (NRM) process by a range of first responders, so analysing only the police referrals does not give a true insight into the known picture. Different parts of the public, private and third sector may also see symptoms of slavery at different points in time and it will be rare for any one agency or person to be able to identify the crime in its entirety.

The 3,266 victims nationally referred to the UKHTC via the NRM in 2015 comprised of:-

- 53% female, 46% male, 1% other (transgender / not recorded)
- 70% adult exploitation, 30% exploitation as a minor
- 44% Labour Exploitation, 40% Sexual exploitation, 16% domestic servitude<sup>11</sup>
- 18% Albanian – predominantly victims of sexual (62%) and labour (23%) exploitation
- 15% Vietnamese – predominantly labour exploitation (48%) or exploitation unknown (34%)
- 8% Nigerian – predominantly sexual exploitation (45%) and domestic servitude (32%)

<sup>10</sup> Crime Statistics, Focus on Violent Crime and Sexual Offences, ONS, February 2016 - Extrapolated estimates

<sup>11</sup> Excludes cases where exploitation type is unknown. Organ harvesting accounted for <1% (5 cases)



Cases identified across Nottinghamshire have predominantly concerned labour exploitation and sexual exploitation involving potential victims from the UK, Poland, Hungary, Romania, Albania, Nigeria, China, Thailand and Vietnam. The 12 NRM referrals made locally in 2015 comprised of:-

- 42% female, 58% male
- 100% adult exploitation
- 75% labour exploitation, 17% sexual exploitation, 8% unknown
- 50% Romanian – 6 victims of labour exploitation
- 17% Polish – both victims of labour exploitation
- 17% Hungarian – 1 victim of labour exploitation, 1 victim of sexual exploitation
- 8% Vietnamese – 1 victim of labour exploitation
- 8% Chinese – 1 victim of sexual exploitation

A comparison between the local and national NRM profile indicates that **certain victim categories are likely to be under-represented within the known picture of modern slavery victims** within Nottingham and Nottinghamshire. These include:-

- Children and young people
- Nottinghamshire County – where the intelligence profile indicate higher prevalence rates
- Sexual exploitation cases
- Nigerian victims of sexual exploitation – noting an increasing trend nationally.

## Labour Exploitation in Nottingham and Nottinghamshire

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The local and national profile<sup>12</sup> of identified forced labour modern slavery to date indicates that **victims are predominantly male (80%), aged between 18 and 35 (22%)** and of **Eastern European** origin – particularly Polish (49%) and Romanian (32%) nationalities.

Victims are more often recruited in their home country lured to the UK by promises of profitable employment only to find their identity papers stolen and being forced to work long hours for minimal rewards<sup>13</sup>. As such, these individual are likely to have been **already vulnerable** within their own countries with little opportunity to improve their life or status.

Labour exportation is naturally most prevalent amongst **low paid, low skilled and often unregulated employment sectors** and industries – particularly those with marked seasonal demands. This includes employment sectors such as:-

- Hospitality – bars / restaurants / fast food outlets / takeaways / bakeries
- Agricultural – farming / harvesting / picking / poultry and eggs
- Service sector - Car washes / Cleaning Companies / Nail bars
- Factories - food packing / sweat shops / recycling sites
- Construction – Building sites / Tarmacking / Paving
- Charity bag collection<sup>14</sup>
- Care - Care homes

Most victims identified within Nottinghamshire to date have travelled to the area by bus and have been transported to an initial local address where they are housed for a couple of days before being moved to another address. The majority of victims are housed in the City but may be used to work in factories and farms beyond city and county boundaries.

Victims are often found employment via agencies such as Transline, but do not receive their wages. The controller often acts as an interpreter or presents as a family member at the workers registration. Polish victims have generally been taken to banks to open accounts before having their cards taken by the controllers. Albanian and Romanian workers identified to date have tended not to have bank accounts and have no access to documentation that would enable them to open one.

Victims generally want to return home and **do not often support a criminal investigation**. Many will not recognise themselves as victims and have little or no understanding their worker's rights. Others may be unwilling to disclose their experiences through fear for their safety.

**Known suspects** in cases of labour exploitation have also been **predominantly male (80%), aged between 26 and 35 (31%)** and of **Eastern European** origin. Victim and offender nationality generally correspond, however this is not always the case<sup>12</sup>.

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<sup>12</sup> Gangmasters Licensing Authority Intelligence Picture January 2015 – February 2016, UKHTC NRM Profile 2015

<sup>13</sup> Strategic Assessment 2015/16 – Nottingham Crime and Drugs Partnership

<sup>14</sup> National trend identified by the UK Human Trafficking Centre (UKHTC)

**The relationship between victimisation and offending can be complex.** Some victims, for example, may commit low level offences as a means to living and working in the UK or as a result of their abuse, while some may be coerced into low level offending by those that control them. There is also evidence of some victims travelling to the UK in order to evade the consequences of serious offences committed within their own country and evidence of offenders promoting their victims to a higher status in order to control their peers, or be used to recruit or control other victims.

While there are **no reliable indicators of trends in and prevalence of forced labour**, research by the Centre for Social Justice<sup>15</sup> in 2015 suggests that there may have been some displacement away from London over recent months towards northern towns and cities, including Bradford, Sheffield and Leeds. Lincolnshire has also been highlighted as a particular area of risk on account of a large numbers of transient agricultural workers.

**Potential cases identified in the Nottingham and Nottinghamshire area to date have included:-**

**Czech national** arrives in **Nottingham** from the Czech Republic and stays with a 'friend' who helps him to find employment and open a bank account. The individual's 'friend' withholds his Czech identification card from him and takes control of his bank card and pin. The victim receives £40 per month from his 'friend' but reports concerns after discovering his bank statement.

Several carwashes across **Mansfield, Sutton in Ashfield, Broxstowe** are identified as potential sites of labour exploitation involving **Eastern European males**. The potential victims have no formal documentation and move in and out regularly. Staff members are questioned on separate occasions but deny being exploited.

A 19 year old **Romanian** male is approached by an Albanian man in Leeds who promises him a managerial job if he and his girlfriend move to **Nottingham**. On arrival, the couple are housed in a property controlled by the Albanian who enters as and when he chooses. The house has 3 bedrooms, each occupying a family that works for the Albanian. After signing papers they do not understand and having their bank card withheld, the couple begin working for 10 hours a day, 7 days a week for around £40 a day. After revealing to a customer that they were not happy, the male is physically abused by his controller, threatened with a hand gun and told he would be sent to London and separated from his girlfriend. The couple seek refuge with a Facebook acquaintance.

Four young **Romanian** females are contacted in their home country by a landlord in **Nottingham** who promises them accommodation and employment. On arrival, they are housed in the Bridlington park area and driven daily to an agricultural field where they work for over 10 hours a day for £100 each per week. The women have no contact with other local people, cannot open a bank account and are told not to share their address.

A **Romanian** man works plastic packaging for a Chinese business in Nottinghamshire for almost a year. He contacts the site manager after realising he has not been paid over recent weeks and is told that he has been fired. The individual discovers that this is routine practice, with the site manager being promised 30% of each new employee's salary.

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<sup>15</sup> Centre for Social Justice, A Modern Response to Modern Slavery (April 2015)

## Sexual Exploitation in Nottingham and Nottinghamshire

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Sexual exploitation is more commonly identified within the city, with cases predominantly involving women trafficked from a range of countries to the area via London.

A number of Oriental sex workers have been identified as potential victims of trafficking in the area but deny they are coerced and usually look to move on. It is understood that even despite only receiving a small proportion of their earnings, these sex workers may still be financially better off in the UK than back in China or Hong Kong.

Recent months have seen increases in the number of Eastern European females and other foreign nationals working as on-street prostitutes<sup>16</sup> in the area, however, at this point in time, none have claimed to be trafficked. Evidence suggests that the risk of young Nigerian females being trafficked to the UK for sexual exploitation has also increased over recent years, with the majority of victims originating from the Edo state of Nigeria<sup>17</sup>.

Victims of sexual exploitation may be identified through a range of channels, including for example:-

- Online – recruitment agencies, adult pornographic sites, child abuse sites
- Massage parlours, brothels, red light districts, escort agencies
- Nightclubs, strip clubs
- Private residences
- Hotels

**Potential cases identified in the Nottingham and Nottinghamshire area to date have included:-**

**Hungarian national** arrives in the UK in search of work after being promised a job by friends from home. On arrival, she is transported to London, then **Nottingham** and kept against her will at various addresses. When she is able to make contact with her partner in Hungary, he alerts the police. This case resulted in two men and one woman being found guilty and sentenced to prison terms of 8 years, 6 years and 2 ½ years.

**Malawian national** arrives in the UK having made arrangements in her native Malawi. She is met by suspect and transported to **Nottingham** to work as a prostitute. Her passport is taken from her as is all money earned.

A transgender **Thai** female is approached by a female in Thailand and offered work in Holland. On arrival, she is forced in to sexual exploitation and transported to the UK where this continues. Offences have occurred in other police force areas, however the victim currently works within the sex trade in **Nottinghamshire**.

Female from **Hong Kong** reports being illegally trafficked to **Nottingham** via London in order to work off gambling debts she accrued in her home country. She takes on small cleaning jobs and pays the debt, but later runs up further debts gambling in Nottingham and starts work as a prostitute. She denies being forced or coerced in any way.

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<sup>16</sup> The Jericho Road Project has reported increased engagement with foreign nationals

<sup>17</sup> [http://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2273039](http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2273039)

## Domestic Servitude in Nottingham and Nottinghamshire

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Domestic servitude is an area which has seen minimal reporting at both a local and national level. These cases are generally more difficult to identify as potential victims can be kept hidden from society with even close neighbours being unaware of their existence. It is not uncommon for cases of domestic servitude to also include aspects of sexual exploitation.

A small number of potential domestic servitude cases have been recorded in Nottinghamshire, largely in the County. The most common method involves the trafficking of a person to become a modern slave by legal marriage abroad and then submitting an application for a spouse's visa to bring them in to the UK, where they become a domestic slave. Other methods include using an unknown organisation/criminal network and travelling abroad personally to bring a victim to the UK.

Pakistan has the highest numbers of potential slaves being taken from an individual country. A number of reports locally have concerned marriages to females from Pakistan who are then brought to the UK and forced into work with restrictions on their social interactions and finances.

Potential opportunities for identifying victims of sexual exploitation include:-

- Community awareness of the presence / risks
- Healthcare professionals and schools where childcare is part of the victim's remit

### Potential cases identified in the Nottingham and Nottinghamshire area to date have included:-

A vulnerable 24 year old **Nottinghamshire** female with learning disabilities moves into an address in the city to stay with her boyfriend. A resident couple and their friend use the female and her boyfriend as a domestic slave where she is subjected to physical assaults and has her benefit money paid into her abuser's accounts. While the boyfriend refuses to cooperate with the investigation as he has known the male offender for many years and doesn't want to get him in trouble, the female proceeds. The offenders all receive prison terms.

Perpetrator has entered a fake marriage to get a visa in the UK and is believed to be trafficking **children from Vietnam** to work in his nail bar in **Worksop** as modern slaves.

**Indian female** working as a housekeeper, nanny and cook in **Mapperley** has her passport retained in a safe by the home owners and her wages sent to her family in India. The home owners state that they are providing food and accommodation to the female. On a return visit it was disclosed that the suspected victim gets weekends off, has a key and freedom.

Victim is married and brought to the UK from **Pakistan** to be domestic slave. Following a report of sexual assault, the victim is taken to a police station, where she discloses sexual assaults, domestic assaults, controlling behaviour and threats to her life. She is referred to a woman's refuge and a safe place is found for her to stay. Suspect is voluntarily interviewed but denies all offences.

## Criminal Exploitation in Nottingham and Nottinghamshire

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There is also evidence of vulnerable victims being forced or coerced into criminal activity in Nottinghamshire. These cases are usually linked to organised crime group activity, with Nottinghamshire recording its first two organised Crime Groups (OCGs) involved in Modern Slavery in 2014 - both featuring Polish nationals who were exploiting other Polish nationals.

Victims of criminal exploitation may be identified through a range of channels, including:-

- Transport companies, public transport
- Retail shops, supermarkets
- On-line businesses
- Cannabis factories
- Adoption centres
- Booking offices
- Registry offices
- Banks

**Potential cases identified in the Nottingham and Nottinghamshire area to date have included:-**

15 year old **Roma** boy is trafficked from Eastern Europe via Belgium into the **Nottingham** to pickpocket and shoplift in order to pay off a family debt. Victim fled his controller in order to contact the police.

Potential female sexual exploitation victim is identified within a commercial cannabis grow in East **Nottinghamshire**. It is likely that similar activity takes place within many of the large commercial cannabis farms located across area which are linked. It is not clear how many individuals may be working in these farms due to debt bondage.

## Protect: Identifying and safeguarding vulnerable victims of modern slavery

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### Identifying and responding to victims

In addition to the range of sectors and industries in which the risk of modern slavery is greatest (see previous section), victims of slavery can present to different agencies in a variety of forms. This could include as perpetrators of crime and ASB offending, such as begging and shoplifting, as abusers of alcohol, as individuals seeking refuge within the church or as individuals with a range of complex mental health, housing and practical support needs.

As it is rare for any single agency to see the full signs of slavery it is important to ensure that partners are **trained and equipped to recognise the signs of modern slavery** and are aware of the channels for reporting concerns.

The **first response** to modern slavery remains critical and is often the only opportunity for intervention amongst transient and hard to reach communities. In addition to the NRM referral process, first responder agencies should also be encouraged to complete MS1 notification forms in cases where potential victims do not consent to be referred into the National referral Mechanism.

Experience has shown that **building trust and confidence** among potential victims of modern slavery is a delicate process that can take many months, however this is often fundamental to securing both victim safety and criminal justice.

It is important to that partner agencies are aware of the **first responder agencies within the area and other key stakeholders** with potential to contribute to the local intelligence picture or identify risk. A number of agencies and sectors have been identified in Appendix 1.

### Victim Needs

Partners should scope and review the most commonly presented **needs of victims** and the **services available to support victims** of modern slavery in the area. The partnership should also consider approaches that will enable the complex needs of victims to be addressed in a holistic way.

The needs commonly presented by identified victims of modern slavery can be many and varied and include:-

- **Financial:** The economic / financial position of modern slavery victims is a common vulnerability factor which acts both as a gateway into slavery and a barrier to escaping their situation. In many cases, foreign nationals will have no recourse to public funds or find that the process for identifying the emergency funds needed is highly complex
- **Housing:** Victims are often housed by being over crowded in to rental accommodation or housed in caravans on the controller's property

- **Mental health:** Victims of modern slavery can often present mental health conditions either as a pre-existing vulnerability factor or as a consequence of the extreme abuse they have suffered. This may have led to opportunities for health partners to identify signs of slavery in cases where anti-depressants or other health-based interventions may have occurred
- **Personal safety:** Many victims of Modern Slavery are subject to verbal or physical threats of violence, both to them or their families, while adults coerced into sexual exploitation are also often coerced under the threat of force, or another penalty
- **Substance misuse needs, particularly alcohol:** Alcohol has been identified as a common coping mechanism amongst victims of modern slavery, particularly Polish and other Eastern European nationalities where a culture of alcohol consumption is more prevalent. Alcohol dependency can also be used in some cases as a mechanism for control
- **Repatriation:** If a victim is from outside the European Economic Area (EEA), they can receive help and financial assistance to return home through the Home Office Assisted Voluntary Return of Irregular Migrants (AVRIM) process. If they are an EEA national, support organisations will put them in contact with their embassy and any relevant charities or NGOs which may be able to help. If a victim of modern slavery is not involved in the criminal justice process, the Home Office may consider a grant of discretionary leave to remain in the UK under usual immigration rules, depending on the victim's personal circumstances.
- **Language barriers:** As modern slavery can involve victims from a wide range of nationalities, the availability of translation services and cultural awareness amongst agencies responding to the issue remains paramount. Key languages presenting include Albanian, Polish, Romanian, Nigerian and Vietnamese.
- **Cultural barriers,** including a lack of trust and confidence in the police: Many foreign nationals have a deep mistrust of the police and are extremely wary of formally reporting offences. This mistrust is recognised and utilised by offenders/controllers and victims are threatened with being turned in to the police.

There are clear opportunities to improve the identification and safeguarding of vulnerable victims of Modern Slavery across Nottingham and Nottinghamshire, particularly by:-

- Improving training, education and awareness of the issue across partner agencies
- Improving multi-agency information and intelligence sharing at all levels
- Working with community and faith groups to secure outreach, trust and confidence
- Mapping and raising awareness of first responder agencies and other stakeholders
- Developing a structured approach to assessing and responding to victim need
- Improving knowledge and availability of key support services and workers rights



## Pursue: Identifying and holding to account perpetrators of modern slavery

Local operations have demonstrated that investigating and responding to modern slavery can be highly resource and time intensive, particularly in cases where victims do not see themselves as such, fear the consequences of coming forward or have links to other aspects of criminality.

**Developing the known intelligence picture** remains critical to an effective response and may require further clarity to be developed amongst partner agencies as to the systems, processes and arrangements for raising awareness and sharing information at all levels. Nottinghamshire Police recognise the importance of **accurately tagging and capturing potential modern slavery** cases reported and continue to drive improvements in their recording processes and procedures<sup>18</sup>.

Relevant agencies should also be aware of the **enforcement and disruption powers** available, including activity to target the products and profits of exploitation and Slavery and trafficking reparation orders (S9 Modern Slavery Act 2015), which require the perpetrator to pay compensation<sup>19</sup> to the victims of modern slavery. Other relevant legislation may include:-

### Summary of Key Enforcement Powers in response to Modern Slavery

- Slavery and trafficking reparation orders (S9 Modern Slavery Act 2015)
- Asylum and Immigration (Treatment of Claimants, etc.) Act 2004 - Trafficking people for exploitation
- UK Borders Act 2007 Search for evidence of nationality [S44](#)
- Identity Documents Act 2010 - False Identity Documents, etc. [S4 - 6](#)
- Forgery and Counterfeiting Act 1981, Fraud Act 2006
- Criminal Law Act 1977 - Conspiracy to commit offences outside the UK [S1A](#)
- Children Act 1989 - Removal and accommodation of children [S46](#), Local Authority's duty to investigate [S47](#)
- Children and Young Persons Act 1933 - Allowing persons under sixteen to be in brothels or be used for begging
- Gangmasters (Licensing) Act 2004 - acting as a gangmaster, being in possession of false documents [S12](#) , [S13](#)
- Proceeds of Crime Act 2002 - Making a confiscation order, Money laundering, [S6 \(4\), \(5\), S75, S327 - 329](#)
- Coroners and Justice Act 2009 - Slavery, servitude and forced or compulsory labour [S71](#)
- Domestic Violence, Crime and Victims Act 2004 - Causing / allowing death of a child or vulnerable adult [S5](#)
- Misuse of Drugs Act 1971 - importation and exportation of controlled drugs etc. [S3](#) , [S4-7](#) , [S8 - 9](#)
- Policing and Crime Act 2009 - Injunctions to prevent gang-related violence [S34](#)
- Serious Crime Act 2015 - Participating in activities of organised crime group [S45](#)
- Sexual Offences Act 1956 - Keeping a brothel used for prostitution, landlord letting, allowing a tenant
- Violent Crime Reduction Act 2006 Forfeiture and detention of vehicles etc. [S54](#)
- Criminal Justice Act 1988, Offences against the Person Act 1861 Sexual Offences Act 2003, Theft Act 1968
- International law - [European Convention on Human Rights \(ECHR\)](#) [Directive 2011/36/EU on Preventing and Combating Trafficking in Human Beings and Protecting its Victims](#) [UN protocol to prevent, suppress and punish trafficking in persons, especially women and children, supplementing the United Nations convention against transnational organised crime](#)

<sup>18</sup> A review of command and control, CRMS and Niche in 2016 found that only 2 out of 9 identified potential modern slavery-related cases (7 crimes and 2 reported incidents) were flagged as such. Work is underway to ensure a common tag is attributed to any crime or incident where there is a potential for a slavery offence occurring. This will enable potential modern slavery reports to be reviewed and analysed more efficiently.

<sup>19</sup> Compensation must not be more than the amount the perpetrator is required to pay under a confiscation order

With only 7 recorded crimes and one successful criminal justice outcome in 2015, **the ratio of recorded crimes to identified cases (NRM referrals) remains relatively low** at 1:1.7

### **Gangmasters Licensing Authority (GLA) / Gangmasters and Labour Abuse Authority (GLAA)**

It is a criminal offence to supply workers without a license or to use an unlicensed labour provider. The Gangmasters Licensing Authority is a Non-Departmental Public Body based in Nottingham which regulates UK businesses providing workers to the fresh produce supply chain and horticulture industry. From October 2016, the remit and powers of the GLA will be expanded under new provisions brought about by the Immigration Bill. This will extend to wider aspects of Labour Abuse and include new powers for arrest and investigation.

The GLA lists 23 licensed recruitment agencies in Nottinghamshire on their [public register](#) and is currently working in partnership with the University of Derby's International Policing and Justice.

There are clear opportunities to improve the **identification and response to perpetrators and facilitators of Modern Slavery** across Nottingham and Nottinghamshire by:-

- Improving multi-agency information and intelligence sharing at all levels
- Further consolidating the known intelligence picture within and across agencies
- Addressing gaps in knowledge and intelligence, such as the process of recruitment and transportation routes to the UK and region
- Improving the targeting and co-ordination of multi-agency activity
- Developing awareness of available enforcement and disruption tools and powers
- Maximising use of new tools and powers and criminal justice opportunities

## **Prevent: Reducing demand, opportunity and vulnerability to modern slavery**

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Prevention and early intervention is widely recognised as the most effective approach to minimising harm to vulnerable people and communities in the longer-term. For this to be effective, however, a comprehensive understanding of the nature, drivers and opportunities for modern slavery in Nottinghamshire is required.

Leicestershire Police have been working with Loughborough University to map trafficking routes and trafficked victim home locations in order to better understand patterns<sup>20</sup>.

There are clear opportunities to improve the approach in Nottingham and Nottinghamshire to **preventing modern slavery** and intervening early, particularly by:-

- Developing our understanding of the composition of local communities, including prevalence of vulnerable and higher-risk groups and new and emerging communities
- Improving our understanding of the pre-exploitation stages of modern slavery, including recruitment and transportation<sup>21</sup>
- Ensuring Police and partners are conversant with the tools and powers available to intervene at key stages of the modern slavery process
- Reducing demand by raising public awareness of the risk and prevalence of modern slavery in order to enable local communities to make informed choices
- Raising the profile of disruption, enforcement and criminal justice outcomes as a potential deterrent to existing and would be perpetrators of modern slavery
- Work with Signpost to Polish Success and the European Information Bureau to map Polish, Romanian and other Slavic speakers to identify trends and patterns

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<sup>20</sup> East Midlands Regional Human Trafficking Meeting, Minutes, 10th February 2016

<sup>21</sup> Intelligence suggests that individuals in Nottingham and the surrounding area are involved in bringing illegal immigrants into the UK and providing false details and passports

## Prepare: Developing capacity and capability in response to Modern Slavery

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### Governance and Leadership

There are a range of partnership boards, groups and forums and engaged in activity to tackle and prevent slavery in Nottinghamshire. This includes work at regional, force and local authority levels via the East Midlands Special Operations Unit, Nottinghamshire Serious and Organised Crime Partnership and activity undertaken by a range of agencies and stakeholders shown on page 20.

There is potential to reduce duplication and further enhance the efficiency and effectiveness of this combined activity by improving clarity and co-ordination of the different roles and responsibilities of key stakeholders and the governance structures, strategies and arrangements in which they operate.

### Implementing learning and best practice

Structured learning from multi-agency Modern Slavery interventions in Nottinghamshire<sup>22</sup> has identified areas for improvement in areas of **planning** and **intelligence sharing** between responders. Clear command structures and the quality and consistency of initial and ongoing communication between key agencies can be critical to the efficiency and effectiveness of these operations. The structured debriefing process has also re-affirmed the need to better enable agencies and communities who may come into contact with victims of slavery to:-

- Recognise the indicators of risk and take effective action at the first point of contact
- Understand the NRM process for referring potential slavery victims to a 'first responder'<sup>23</sup>
- Be aware of the services and support available to potential victims.

There are also clear opportunities to learn from national and international examples of good practice in the response to Modern Slavery, including Task Force-based approaches in the US, West Midlands, GMP and Cambridgeshire.

There are opportunities to improve our **preparedness to tackle modern slavery** approach in Nottingham and Nottinghamshire, particularly by:-

- Strengthening linkages between statutory and community and voluntary sector partners
- Improving our understanding of new and emerging communities and changing threats
- Clarifying governance arrangements, roles and responsibilities between key agencies
- Ensuring learning is captured through a structured multi-agency debrief process
- Developing generic multi-agency plans in preparation for future modern slavery operations

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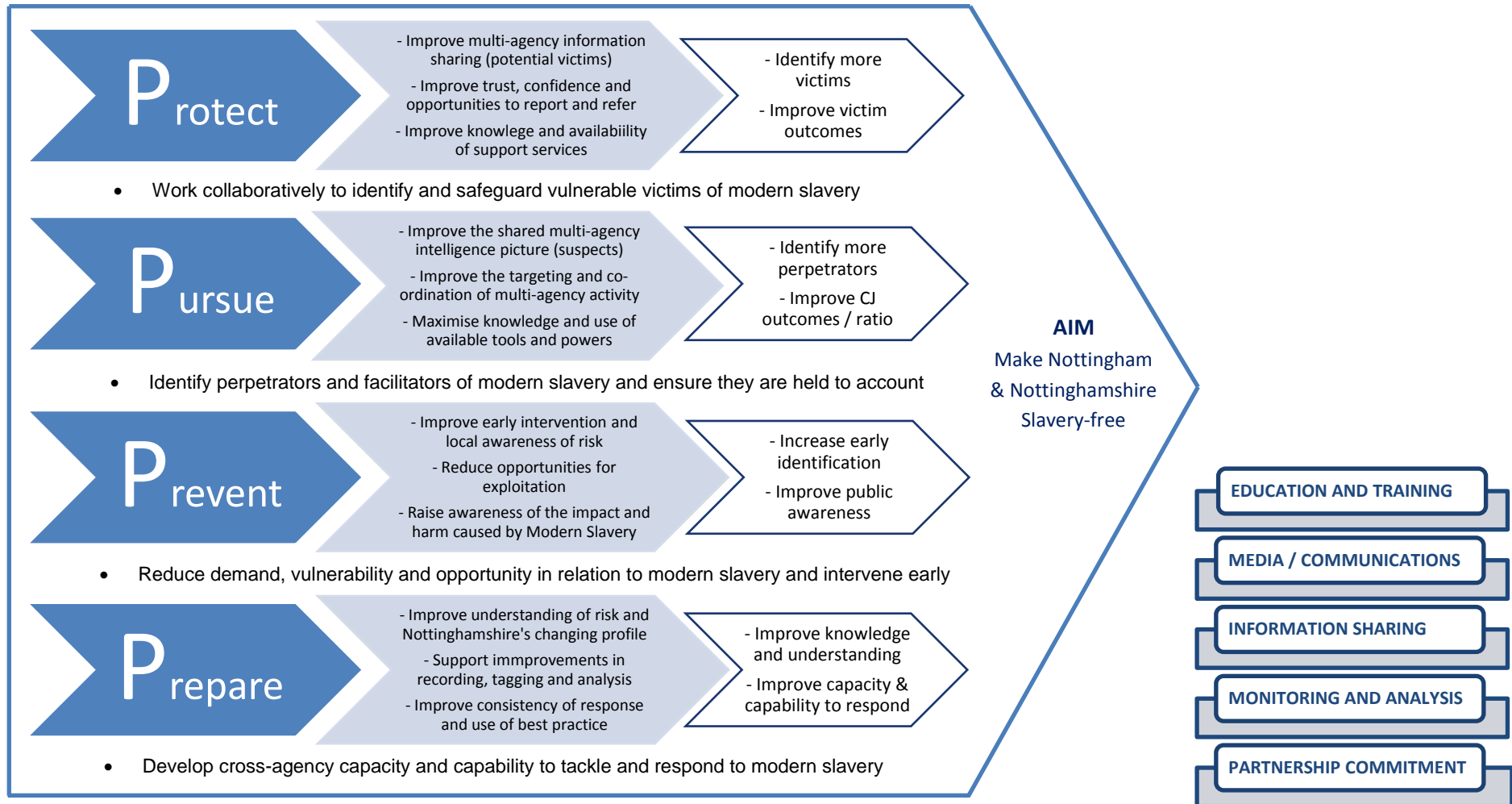
<sup>22</sup> 2016 Structured debrief process – July 2016

<sup>23</sup> To be referred to the NRM, potential victims of slavery must first be referred to one of the UK's two competent authorities (the UK Human Trafficking Centre (UKHTC) or the Home Office Immigration and Visas (UKVI)) by a first responder. These include: Police force, UK Border Force, Home Office Immigration and Visas, Gangmasters Licensing Authority, Local Authority, Salvation Army, Poppy Project, Migrant Help, Medaille Trust, Kalayaan, Barnardos, Unseen, NSPCC (CTAC), BAWSO, New Pathways, Refugee Council

## Key Stakeholders and potential intelligence opportunities

National and Regional Bodies	National Crime Agency		UK Human Trafficking Centre
	East Midlands Specialist Operations Unit (EMSOU)		
	Government Agency Intelligence Network (GAIN)		
	<b>Crime, Community Safety and Criminal Justice</b> <ul style="list-style-type: none"> <li>• Nottinghamshire Police</li> <li>• Police &amp; Crime Commissioner</li> <li>• Community Safety Partnerships (SNB, CDP)</li> <li>• Fire and Rescue Service</li> <li>• Notts. Criminal Justice Board</li> <li>• Crown Prosecution Service</li> <li>• National Probation Service</li> <li>• Magistrates</li> <li>• Youth Offending Teams</li> </ul>	<b>Health , Wellbeing and Other Safeguarding agencies</b> <ul style="list-style-type: none"> <li>• Safeguarding Adults Board</li> <li>• Safeguarding Children Boards</li> <li>• Health and Wellbeing Boards</li> <li>• Medical practitioners and dentists (records of injuries)</li> <li>• Health complaints and disclosures made to staff</li> <li>• Care Quality Commission</li> <li>• Clinical Commissioning Groups</li> <li>• Public Health England</li> </ul>	<b>Other Local Government</b> <ul style="list-style-type: none"> <li>• Cohesion Teams</li> <li>• Housing</li> <li>• Environmental Health</li> <li>• Children’s services</li> <li>• Social care, Social Workers</li> <li>• Welfare and compliance visits</li> <li>• Education, teachers</li> <li>• Transport</li> <li>• Trading standards</li> <li>• Citizens Advice Bureau</li> <li>• Environment Agency</li> </ul>
Government Agencies			
Private Sector	<b>Industries / regulators</b> <ul style="list-style-type: none"> <li>• Human Resources Staff</li> <li>• Gangmasters Licensing Authority (GLA)</li> <li>• Nottinghamshire Business Crime Partnership</li> <li>• Local Business leaders</li> <li>• Recruitment agencies</li> <li>• Large scale employers</li> </ul>	<b>Fraud and Finance</b> <ul style="list-style-type: none"> <li>• HMRC</li> <li>• Banks and building societies</li> <li>• International money transfer companies e.g. MoneyGram, Western Union</li> <li>• Callcredit, Experian and Equifax reference agencies</li> <li>• Benefits agencies</li> </ul>	<b>Transport</b> <ul style="list-style-type: none"> <li>• Rail services</li> <li>• Nottingham East Midlands Airport and Airlines - especially low-cost carriers</li> <li>• Taxi services</li> <li>• Bus and coach operators</li> <li>• Transportation companies</li> <li>• Motorway service stations</li> </ul>
Community and Voluntary Sector	<b>Faith Community and Voluntary Sector</b> <ul style="list-style-type: none"> <li>• <a href="#">Anti-slavery charities and non-government organisations</a></li> <li>• British Red Cross</li> <li>• Salvation Army</li> <li>• <a href="#">Emmanuelle House</a></li> <li>• STEPS</li> <li>• Framework</li> <li>• <a href="#">Signpost to Polish Success</a></li> <li>• <a href="#">BEGIN – Notts. ESOL support</a></li> <li>• <a href="#">Belong</a></li> <li>• Refugee Forum</li> <li>• Citizens for Sanctuary</li> <li>• Rainbow Project</li> <li>• <a href="#">POW</a></li> <li>• Jericho Road Project</li> <li>• Migrant Help</li> </ul>	<b>Other networks of support for vulnerable people</b> <ul style="list-style-type: none"> <li>• Hostels, YMCAs</li> <li>• Crisis Workers</li> <li>• Interpreter services, CINTRA</li> <li>• Independent Domestic Violence Advisors (IDVA) / Independent Sexual Violence Advisors (ISVA)</li> <li>• Independent Sexual Violence Advocates, WAIS, WA, ISAS,</li> <li>• Nottingham Rape Crisis</li> <li>• Nottingham Law Centre</li> <li>• St Ann’s advice Centre</li> <li>• Shelter and refuge workers</li> <li>• Community workers</li> <li>• Renewal Trust</li> <li>• Food banks, soup kitchens</li> <li>• Drop-in centres, day centres</li> </ul>	<b>Community and other</b> <ul style="list-style-type: none"> <li>• Local communities</li> <li>• Private sector</li> <li>• Media</li> <li>• Private housing associations</li> <li>• Hotels, Universities</li> <li>• Utility providers, Landlords</li> <li>• Cleaners, Postal workers</li> </ul>
			<b>Helplines and Anonymous channels of disclosure</b> <ul style="list-style-type: none"> <li>• Modern Slavery Helpline - 0800 0121 700</li> <li>• Gangmasters Licensing Authority - 0115 959 7032</li> <li>• Crimestoppers - 0800 555 111</li> <li>• ChildLine - 0800 1111</li> </ul>

## Draft Modern Slavery Strategic Framework



## Glossary of Terms

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<b>Forced or compulsory labour</b>	‘All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily’ (Section 1 of the Forced Labour Convention, 1930 (No. 29)). Indicators of forced or compulsory labour include recruitment by deception, coercion and/or abuse, exploitation at work, and coercion at destination.
<b>Gangmasters Licensing Authority</b>	Non-Departmental Public Body (NDPB) which operates a licensing scheme to regulate businesses which provide workers to the fresh produce supply chain and horticulture industry. The organisations role, remit and powers as a modern slavery first responder will be extended in October 2016 when it becomes the Gangmaster and Labour Abuse Authority.
<b>Human trafficking</b>	Arranging or facilitating the travel <sup>24</sup> of another person, to exploit them. (Section 2 of the Modern Slavery Act 2015 and Article 3 of the Palermo Protocol. It is irrelevant whether the exploited person consents to the travel. A person may arrange or facilitate the exploitation of another by recruiting them, transporting or transferring them, harbouring or receiving them, or transferring or exchanging control over them. In determining whether or not a child (under 18) is a victim of trafficking, their consent to being trafficked is irrelevant and how they are trafficked is also irrelevant. Only the act and the purpose need to be present – it is not necessary to prove coercion or any other inducement.
<b>Human smuggling</b>	To move a person across a border illegally. This is regarded as a violation of state sovereignty and is not human trafficking or a form of modern slavery. Human smuggling occurs when a person seeks the help of a facilitator to enter the UK illegally, and the relationship between both parties ends when the transaction is complete. It is a consensual agreement. A smuggled person is, however, a potential victim who may be vulnerable to being trafficked at any point in their journey, and the distinction can be blurred.
<b>National Referral Mechanism</b>	System introduced in 2009 which identifies, assesses and supports victims of trafficking. Referrals are submitted to the Human Trafficking Centre by first responders, such as police, immigration officers, social workers where there are reasonable grounds to believe a person may be a victim of trafficking. Victim consent is required in order for a referral to be made.
<b>‘Operation Eagle’</b>	National Police Chief’s Council’s (NPCC) banner for modern slavery
<b>Servitude</b>	A ‘particularly serious form of denial of freedom’ (Siliadin v France [2006] 43 EHRR 16, the European Court of Human Rights). It includes the obligation to provide certain services to another and for the ‘serf’ to live on the other’s property with the perceived impossibility of changing his or her status. Servitude is linked to slavery, but is much broader.
<b>Slavery</b>	The status or condition of a person over whom any, or all, of the powers attaching the right of ownership are exercised. Characteristics of ownership and indoctrination need to be present.

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<sup>24</sup> Arriving in or entering any country; departing from any country; and travelling within any country

## Resources

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### Guidance

- Public authorities [Duty to notify the Home Office of potential victims of modern slavery](#) , Home Office, March 2016
- [Slavery and human trafficking in supply chains: guidance for businesses](#), Home Office, October 2015
- [Support for victims of Modern Slavery](#), Home Office, March 2016 - Versions in Albanian, Czech, Hungarian, Lithuanian, Luganda, Mandarin, Polish, Romanian, Slovakian, Vietnamese and Yoruba are also available on the Home Office website
- [Victims of human trafficking: competent authority guidance](#), UK Visas and Immigration, March 2016
- [National referral mechanism pilot: slavery safeguarding leads \(SSL\) and multi-disciplinary panel members](#) , Home Office, June 2016
- National Occupational Standards for Modern Slavery regarding [assessing the needs of potential victims](#), [support plans](#) and [safeguarding](#)

### Training, Education and Awareness Raising

NCALT On-line Learning Packages - Two e-learning packages on MLE NCALT have been developed and are now mandatory for Nottinghamshire officers. These are:

- Human Trafficking
- 'Missing Daughter' (Public Protection package)
- Gangmasters Training and awareness raising material
- ['Say Something if you See Something'](#) campaign material
- [Modern Slavery – Resources for industry](#) , Home Office factsheets

### Outreach and Support

- [Home Office: Victims of Modern Slavery – Competent Authority Guidance](#)
- [Help Is Here](#) – signposting, support and information



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