Eliminating Modern Slavery: Enhancing the Police Response

Conference Report
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principal’s foreword

I am pleased to commend to you this report of the 2017 Cumberland Lodge annual police conference, ‘Eliminating Modern Slavery: Enhancing the Police Response’.

The trading and trafficking of people is rightly recognised as one of the most important social issues of our time. And yet — as this conference highlighted — it is particularly difficult to address, given its international dimension and insidious nature. However, we hope that by bringing together those with insights and expertise from a range of relevant perspectives, and by sharing good practice, this conference has made a contribution to enhancing the policing of modern slavery. We hope, too, that this report and the discussions it will stimulate, will lead to further progress in this area.

We are grateful to our Research Associate Caitlyn McGeer who has written this report and the pre-conference briefing paper which is available at https://www.cumberlandlodge.ac.uk/learning-resources/eliminating-slavery-enhancing-police-response-conference-briefing

Canon Dr Edmund Newell

about us

Cumberland Lodge in Windsor Great Park is home to an educational charity with the vision of more peaceful, tolerant and inclusive societies.

We offer a ‘safe’ space for unsafe conversations, tackling the causes and effects of social divisions by challenging silo thinking and equipping and inspiring people to engage in constructive dialogue.

We bring together leaders and influencers, students and community practitioners, and foster learning and critical thinking through:

- Subsidised residential study retreats for students in higher education
- Inter-disciplinary conferences, lectures and seminars, with leading figures from public life
- Mentoring schemes and scholarships for early career researchers and international students
- Educational and cultural events for the wider community, including schools workshops, public lectures, art exhibitions and literary events.

Cumberland Lodge is celebrating its 70th anniversary as an educational foundation in 2017. Find out more about its history and heritage at: cumberlandlodge.ac.uk/timeline.
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Despite the formal abolition of slavery in 1833, the problem itself did not completely disappear; instead, it went undercover and its manifestations became more diverse. In the last 10 years, there has been an increasing recognition of, and response to, modern slavery at a global level, as evidenced by the inclusion of eradicating modern slavery as one of the United Nations’ Sustainable Development Goals. In 2016, Prime Minister Theresa May has described modern slavery as ‘the great human rights issue of our time’ and called for practitioners and organisations to work together to stamp out modern slavery by establishing a ‘model national response’ based on:

- A strong law enforcement action and legislative framework
- Reducing vulnerability and supporting victims
- Tackling transparency in supply chains
- Effective international co-operation.

Cumberland Lodge organised its interactive, residential conference on ‘Eliminating Modern Slavery: Enhancing the Police Response’ in April 2017 to respond to this call. The conference brought together delegates from law enforcement, non-governmental organisations (NGOs), the private sector and academia, to explore ways of enhancing the UK’s strategy for countering modern slavery, and providing an example that other countries can (continue to) model their own strategies on.

The conference examined the barriers to, and opportunities for, enhancing the police response to modern slavery and made a series of practical recommendations. This report summarises the content and key learning points from three days of discussions. It starts by highlighting just how far we have come in the last 10 years, in terms of recognising and responding to modern slavery. Yet, while there has been great progress, responding to modern slavery is still beset by challenges and the report goes on to outline these. It then moves on to discuss means of improving the current response and finishes with a summary of the delegates’ recommendations, which supports and provides weight to the recommendations of the Independent Anti-slavery Commissioner’s Annual Report 2015-2016 and The Modern Slavery Act 2015 Review.

Delegates drew on the metaphor that the battle itself might have been lost, but the troops are assembled and the war can still be (and indeed has to be) won. In other words, we have had some success in responding to modern slavery but, ultimately, we are failing to do enough. Yet, we have learnt from past endeavours and are now poised to enhance the response, with the ultimate aim of stamping out modern slavery, worldwide (i.e. to win the war).

The conference operated under Chatham House Rule in order to facilitate open and honest discussion, which is why this report does not identify any speakers.

The consensus reached during the conference was that the ‘gold standard’ for modern slavery responses involves covert policing techniques and victimless prosecutions. To achieve this, the UK must take
actions to enhance modern slavery responses that are premised on:

- A greater understanding of operational deployment capacity for both combatting modern slavery and safeguarding victims;
- Rising numbers of victims being identified;
- Improved partnership working.

Given the pressing need to enhance law enforcement capacity in response to modern slavery, at local, national and international levels, the recommendations that arose from this conference have the potential to form not only the basis of follow-up events but also to inform wider policy and practice.

2. celebrating a decade of progress

Speakers at the conference highlighted the importance of both appreciating how far we have come in the last 10 years but also how much farther we still have to go to really combat the problem of modern slavery. By passing the Modern Slavery Act in 2015\(^6\), the UK positioned itself as a global leader in responses to modern slavery. This should be celebrated, along with other achievements in the last decade, in order to empower and inform future action. Examples of these big steps forward include: our growing understanding of the scale and nature of modern slavery; the increased effort being made by various agencies, including the police, to respond to modern slavery; and the increased political will to prevent, protect, prosecute, and work in partnership, to tackle it.

2.1 broadening of understanding

Ten years ago, modern slavery was largely conceptualised in terms of sexual exploitation. It was sexualised and acknowledged as being morally wrong. Aside from shocking cases of sexual exploitation, modern slavery was generally viewed as a facet of illegal immigration, with victims often being perceived as offenders. However, over the last 10 years our understanding of the problem has broadened to include cases of forced labour, child exploitation, domestic servitude, criminal exploitation and organ/human tissue/blood harvesting, alongside sexual exploitation.

2.2 increased effort

There have been pockets of inspiring best practice across the UK in the last 10 years, and some highly successful investigations and prosecutions. Delegates agreed that one of the strengths of the response so far has been the top-down buy-in involved. This has fostered a willingness to learn, within and between forces, as well as the development of new training content. There are many committed and passionate officers on both the front-line and at senior management levels, who are working hard to tackle the problem. Delegates cited the use of covert investigative techniques, multi-agency working, the strengthening of NGO and law enforcement partnerships, and the increasing body of research evidence and knowledge, as other strengths. It was also agreed that ground-level identification is improving. The ‘duty to notify’ has been a game changer and resulted in an upsurge of referrals from NGOs.

Forces have employed a variety of new approaches to improve their responses to modern slavery. These have included: forming partnerships with Eastern European forces (e.g. in Romania); appointing a single point of contact for stakeholder co-ordination (e.g. in businesses, NGOs and the police); appointing

\(^6\) For more information: http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf
tactical advisors (i.e. more experience and highly trained officers) to enable effective police responses; and appointing victim liaison officers to provide greater support for victims.

**2.3 political will (for now)**

The landscape of policing has also changed in the last decade, and this has been coupled with legislative changes, and changes in government attitudes to modern slavery. As Home Secretary and now as Prime Minister, Theresa May has been crucial in moving modern slavery up the political agenda. From a policing and political standpoint, the issue is finally being treated as a political priority. However, delegates at the conference did raise concerns about how Brexit could influence this position via changes to the European Union structure, and many questioned whether the political will would have be sustained in the event that May was not re-elected in the 8 June 2017 General Election. There was support for pushing questions forward, in terms of how European Union security relations, as they relate to modern slavery, will be maintained (e.g. intelligence sharing) post-Brexit.

**2.4 leading by example**

As explained above, the Modern Slavery Act is recognised as the ‘gold standard’ in modern slavery legislation. Because of this, the UK is currently working bi- and multi-laterally with other countries around the world, to help eradicate the global problem of slavery. This includes working bilaterally with source countries to tackle the problem of trafficking head-on, bilaterally with countries that have the highest global incidences of modern slavery, and multi-laterally to increase international recognition of the problem as framed by the Sustainable Development Goals. This involves: capacity building in terms of increasing understanding (e.g. through intelligence and evidence), working to embed the political will to act (e.g. to gain senior level buy-in); establishing and/or empowering capable systems (e.g. of law enforcement and criminal justice); developing partnership approaches; and general preventative work.

**3. a challenging landscape remains**

Whilst acknowledging how far we have come, for most of the conference delegates focused on defining and tackling the challenges that lie ahead. Modern slavery’s intersectional nature, its entanglements in the supply chain, and its tendency to cross borders, present fundamental challenges for detection and deterrence. The significant intelligence gap, in terms of our knowledge about the extent and prevalence of modern slavery, compounds these challenges. Further, the situation is aggravated by the fact that the responses we currently make to modern slavery appear to be failing to meet victims’ needs.
3.1 Intersectional nature

Much of the discussion focused on how modern slavery intersects with other topical realities. Firstly, modern slavery intersects with the proliferation of internet use. Social media can facilitate the exploitation of vulnerabilities to boost slave recruitment. Secondly, modern slavery intersects with private sector regulation and corporate social responsibility. There was consensus among delegates about the need to call on the private sector to do more to respond to modern slavery and a feeling that a cultural step-change is needed in the way that businesses operate in this regard. Delegates called for police forces to increasingly engage with businesses to help address the problem. Economically, the pressure on business is often so great that cheap labour (labour exploitation) is justified as means of making profit. Several delegates argued that, thanks to globalisation, all of us have come into contact with modern slavery, whether we acknowledge it or not, whether it is through the mined coltan in our mobile phones and electronic devices, or through purchasing cheap clothes made in parts of the world where labour exploitation is commonplace.

Conflict around the world has created a vast population of vulnerable and displaced people who are susceptible to exploitation. Organised crime groups (OCGs) have capitalised on this by developing sophisticated modern slavery business models that thrive under the radar. Highly organised OCGs are working on international, national, and local scales. For example, one speaker explained that some international OCGs sub-contract to criminals in the UK to ‘man’ airports and identify potential slaves. Given that modern slavery intersects with organised crime, it also has links with other types of crime that the OCGs are involved in. There are strong links between OCGs, drug trafficking, child sexual exploitation, and modern slavery, for example. Yet, delegates agreed that, in comparison to responses to these other types of crime, modern slavery responses often fall short.

Lastly, modern slavery intersects with the tensions over immigration. The global crisis over migration—which can also be seen as a backlash against globalisation—is fundamentally linked to modern slavery. Several delegates argued that the weight of public opinion is that we do not want any more refugees in Britain, which can be a real obstacle in terms of motivating the public to assist in the identification of victims of modern slavery and to take action by changing their consumption habits.

3.2 Links to consumerism

Compounding its intersectional nature is the fact that modern slavery is inherently linked to the supply chain. Speakers explained that consumer demand at one end of the supply chain drives the supply of slaves at the other end. For this reason, deterring modern slavery will involve convincing people to change their consumer habits and move away from cheap ‘throw-away’ clothes and goods, through education and awareness raising campaigns. However, this in turn raises the ethical question of, ‘How much should a pair of jeans cost?’, which highlights that consumer education is only part of the solution. There is a need for global ratification of International Labor Organization (ILO)’s Forced Labour Convention, 1930, which prohibits the use of forced labour and seeks to protect human rights. Ratification of this convention should be coupled with increasing international co-operation to facilitate financial tracking and greater transparency.

3.3 Across borders

Modern slavery is a borderless crime; it crosses international, national and local borders. On an international level, there are challenges in managing how different agencies work together. As the conference highlighted, evidence ideally needs to be shared across national borders, but that this is hard.

For more information:
to achieve in practice. The sheer scale of international modern slavery networks necessitates a co-ordinated response with the authorities in source countries (e.g. Eastern Europe, Vietnam or Nigeria). This requires a significant investment of funds, time and effort.

While delegates agreed that modern slavery is a global problem that requires global solutions, the general sentiment was that we need to get it right ‘in our own backyard’ first. The UK is plagued by the issues in responses when county lines are crossed. This includes issues coordinating data sharing across these lines. When cases of modern slavery cross police force and local authority boundaries, as they often do, there tends to be a lack of capacity to adequately investigate them.

Delegates disagreed on the best mechanisms for responding to the borderless nature of modern slavery. Some believed that we need to professionalise cross-border procedures and build stronger links between forces on a national and international level. They cited evidence of the recent successful collaborative investigations between forces in the UK and Romania. Other delegates felt that to professionalise something is bureaucratic and involves a linear approach, which does not suit modern slavery investigations because they are fundamentally non-linear and unpredictable.

3.4 the intelligence gap

Modern slavery is a still a significantly under-researched crime, which makes it difficult to co-ordinate police action. Delegates agreed that what we do know from research—that there are between 10,000-13,000 modern slavery victims— is likely to fall short of the reality. It is widely accepted that these figures are just the tip of the iceberg. There was a general feeling that the scale of the problem has increased in the past few years and it will continue to increase, especially in terms of labour exploitation.

While we have captured some of the picture – by drawing on the National Referral Mechanism (NRM) data and the case-by-case evidence – this does not readily extend to an understanding of the mass global movement of people. Delegates were unsure about how to accumulate the required body of research evidence and questioned whether the Joint Slavery & Trafficking Assessment Centre (JSTAC), a dedicated analytical team focused on gather impressive related to modern slavery, has the capacity to achieve it.

3.5 failing to meet victims’ needs

The conference also considered ways in which the policing of modern slavery could be enhanced in terms of meeting and responding to the needs of its victims. Current victim safeguarding procedures are disjointed and does not take into account the wide range of vulnerabilities that victims may present with. One delegate revealing that it can take up to seven years for an individual to talk about what happened to them without being re-traumatised by the very process of disclosing the information. Modern slavery


victims are currently expected to re-tell their story multiple times and to many different actors, such as the police, NGOs and the Crown Prosecution Service (CPS). However, delegates also stressed that, as trust develops over time, a victim’s story is likely to change, with more details being added.

Delegates argued that we need to focus on enabling victimless prosecutions because these prosecutions protect victims from being re-traumatised throughout the court proceedings and that there must be a vehicle by which to make NRM decisions more quickly (e.g. by using local authorities as decision-makers instead of the two Competent Authorities). Under the NRM, victims have to prove that they are a victim and the decision-making processes generally take far longer than delegates believed they should. Delegates highlighted that we need to ensure immediate access to support offered outside of the Asylum system.

Many delegates voiced concerns over the lack of a recognised minimum standard of care for modern slavery victims; many NGOs offer different levels of service and there is a lack of consistency. Delegates questioned whether we need to regulate and professionalise victim care. Evidence-led interventions are particularly important in modern slavery cases, given the huge diversity of people who are its victims.

The system particularly fails younger victims because children are expected to go through a particularly clunky system, involving immigration and asylum agencies; healthcare services; education; the criminal justice system and social services, in many cases. There is a currently a significant disconnect between these agencies, and children can be interviewed or questioned by each agency in turn, prior to intake. Several delegates gave examples of other countries with more co-ordinated approaches to this than the UK. For instance, in Belgium, one person interviews the child victim first and, if any more interviews are required, the same person conducts them.

Other delegates argued that we are not using the Children’s Act\(^\text{10}\) correctly in the UK, because we are failing to properly safeguard child victims by using the Act to treat them as vulnerable. There was a strong feeling that we could learn a lot from the child safeguarding models of Scotland and Northern Ireland when it comes to modern slavery. Currently, in England and Wales, children have no guarantee of specialist support and they are subject to a ‘postcode lottery’ for accessing services. The result is that child victims are not actually getting the care they need on a deeper level, and, when their care ends, they are often at risk of suffering break-downs or other adverse health outcomes. There was a call for responses to cases of child slavery be embedded in multi-agency partnerships, along similar lines to the way in which Multi-Agency Safeguarding Hubs (MASH) function by bringing agencies work together to identify children and vulnerable adults under.

Age Assessments can be particularly traumatic for child victims of modern slavery. They can also delay responses and affect the trust relationship between social workers and the individual. One delegate voiced concerns about the lack of consistency in procedures for Age Assessment and outlined some of the negative consequences of the current system, which included child pregnancies as a result of being housed in adult accommodation. Other risks related to an adult verdict, in error, to a child victim from Age Assessments include:

- Children can end up in the adult asylum system, which is not equipped to meet their needs;
- There is a high risk of re-trafficking;
- International protections for children are denied, and the focus is often on immigrant detention and removal instead;
- Homelessness often ensues, as do criminalisation and imprisonment;
- It can reaffirm the victim’s mistrust in authorities; and
- It risks jeopardising the physical/mental health and wellbeing of the victim.

\(^{10}\) For more information: http://www.legislation.gov.uk/ukpga/2004/31/contents
Some representatives at the conference from outside of the law enforcement sector suggested that victims are often afraid to engage with the police, and that there is a real need for police to be able to deal with urgent situations sensitively and appropriately. Any failures on the part of the police to follow-up on requests for support can also cause serious harm. Police need to understand that it takes time to build trust and that a smooth transition from victims interacting with care workers to police is needed. It is the little things that matter; for instance, offering a victim something to eat while they are giving their statement. These delegates did, however, acknowledge that victims of modern slavery are not always the easiest people to assist. For instance, they may not present and/or self-identify as victims. Officers need to be able to differentiate between willing and unwilling sex workers, for example, or to uncover a cannabis operation and determine who the leaders and victims are. This involves ensuring that officers can read the relevant cues and signs.

4. overcoming the challenges: improving the response

Having outlined the challenges facing police in responding to modern slavery, delegates focused on suggesting informed pathways for overcoming them. These included:

- Tackling the demand for modern slavery by way of public education;
- Strengthening the Modern Slavery Act;
- Embedding responses to modern slavery into political agendas; and
- Enhancing existing responses by enabling intelligence policing, putting victims first and promoting partnerships.

4.1 tackling the demand for modern slavery

1) public education

Delegates called for education to raise public awareness of the fact that when we use cheap services, they are cheap for a reason, and to enable people to recognise modern slavery as an unacceptable crime. The public can fulfil a look-out role, but they need to be taught to look out for the signs and symptoms. Delegates argued that we need to: empower the public to make informed choices; engage the media in the process; and counter the existing rhetoric around immigration.

Unresolved questions included how to brand an anti-modern slavery campaign and how to ensure that it can access multi-cultural platforms. One of the main barriers to public education that delegates raised was the blurring of modern slavery with immigration concerns. There are widespread public concerns about the identification of modern slavery victims creating a ‘back door’ to immigration, and that victims are often compliant. However, delegates agreed that the focus of any educational campaigns should be on the evils of modern slavery – the fact that it involves the commodification of human beings – to really engage the public with the problem at hand.

2) strengthening the Modern Slavery Act

Delegates called for a strengthening of the Modern Slavery Act in relation to business accountability. The Act relies on businesses and others to meet its standards and to develop a business culture that is void of modern slavery; yet, in practice, it needs mechanisms to ensure accountability. The Act could also signpost to other pieces of legislation that enable the disruption of modern slavery in ‘creative’ ways.
(e.g. freezing bank accounts for the financial crime aspect).

A few delegates reported that they found domestic servitude visas particularly troubling, and this is another aspect of the Modern Slavery Act that could be strengthened to alleviate potential negative consequences associated with the visas. The visa binds those who hold it to their employers, making them particularly vulnerable to exploitation.

3) embedding responses into political agendas

Delegates cited poor international recognition of the problem of modern slavery and, hence, the need to raise its profile globally. This will involve securing international legal abidance to the various protocols that protect against modern slavery. Once international recognition is increased, it will be easier to facilitate joint approaches to tackling the problem.

There is also a need to embed modern slavery responses across all political agendas in the UK. Theresa May has been crucial in bringing modern slavery into the spot-light, but momentum she has created needs to continue. Delegates suggested that to do so will involve generating wider public understanding of modern slavery as an issue that threatens human decency – one that politicians cannot possibly ignore.

4.2 empowering the front-line

1) intelligent policing

Delegates made a distinction between intelligence-led policing and intelligent policing, stressing the need to establish practices that reflect the latter. Intelligence policing means being strategically focused (with whatever is done) and being a learning organisation. The JSTAC cannot function without local intelligence and, more broadly, forces need to share best practice to build a solid evidence base for interventions. Some delegates suggested applying best practice from child sexual exploitation responses in the first instance.

Intelligent policing enables the enhancement of the response to modern slavery. Delegates highlighted several examples of best practice that are central to intelligent policing. These included debriefings, for example in line with Lancashire’s 7-Minute Debriefs\(^\text{11}\), and creating a central hub where good practice can be shared across forces. Best practice also includes engaging in proactive responses, assessing business frameworks as a starting point. This involves a focus on monetary transactions and the flows of financial capital. Delegates explained that it is important to understand that modern slavery revolves around commodities, just like any other business, and evidence needs to be layered around those commodities, even if they are human beings. Delegates agreed that modern slavery investigations require a wide range of police skills, as they are complex and intersect with many different types of crime. Investigators need to be tenacious and brace themselves for a long-term investigation.

Enhancing capacity through training is crucial to establishing intelligent policing. Delegates agreed that the cross-border and intersectional nature of modern slavery is currently not taught. Moreover, officers are not generally made aware of the different ways in which vulnerabilities can manifest. Responding to modern slavery intelligently requires a shift in mind-set. The next generation of front-line officers need to know the latest approaches for responding to modern slavery. Delegates cited front-line staff as being

\(^\text{11}\) Based on techniques established by the United States Federal Bureau of Investigation, seven-minute debriefs focus on capturing attention spans and relaying both new information and reminders about already-known information. For more information: http://www.lancashire safeguarding.org.uk/media/14351/WHAT-ARE-7-MINUTE-BRIEFINGS.pdf
the biggest source of intelligence, but they need to have the confidence to identify and respond to what they witness in the community.

2) putting victims first

Delegates stressed the importance of placing safeguarding at the centre of responses to modern slavery. This involves enhancing our understanding of the complexity of disclosure and identification. Common barriers to disclosure and identification include: grooming, social isolation, debt bondage, spiritual possession, and a denial of having been trafficked. The existence of these barriers can cause victims to change their stories.

Several delegates highlighted the importance of understanding that a victim's initial statement will likely change as they begin to trust their first responders. Later on, stories typically include more detail. The more victims trust, the more they will tell. Therefore, the first statement should not be taken as evidence when later statements have also been given. Forming a trusting relationship is crucial when responding to modern slavery, but this can be challenging to do. Small actions go a long way. When victim expectations are either not met or not handled professionally, there can be serious negative consequences. Victims can end up backing up and putting their trust in others instead, including people who might exploit them again (or who have already exploited them). Re-focusing on establishing trust will involve streamlining the current system. The stress involved in going through such a complicated process can be disempowering for victims. Trust must also be established between different agencies involved in the response, so that victims do not have to continually repeat their story and risk re-traumatisation.

Part of the trust-building process involves giving the victims agency. Delegates offered examples of how this can be achieved, such as: using a victim's name (rather than referring to them as a victim) and keeping victims informed throughout the investigation, the latter being crucial to facilitating a sense of ownership of the process. Keeping victims informed has been particularly challenging when cases have been transferred between forces or departments. Some delegates from outside of the law enforcement sector suggested that the focus of police officers is often more on managing their own records than on sharing information.

Delegates also highlighted the need to improve specialist victim care and to innovate in that regard, as well as to “fix” certain problems with the NRM (e.g. to address issues such as the long wait time for decisions).

3) partnerships

Establishing effective, successful partnership working was a core recommendation for overcoming the challenges of responding to modern slavery. The conference brought together delegates from a wide range of sectors and one of its aims was to build a foundation on which these partnerships could be built. Delegates agreed that, in order to make things happen, stakeholders need to have the humility to come together, placing egos aside, to share intelligence and best practice. There was an expression of hope and commitment to working together to form new partnerships after the conference concluded.

Delegates agreed that partnerships between the police, the CPS, NGOs and businesses are crucial to improving the response to modern slavery. Partnerships require bidirectional commitment and respect to be effective. For instance, there were suggestions that attitudes of the police towards the CPS need to change. The CPS is the end-user of police work, and modern slavery cases are some of the hardest to prosecute. While victimless prosecutions are possible, they are difficult to achieve in practice. They rely on the police liaising with the CPS to ensure that the right type of evidence is collected and that there is an awareness of the evidence that is lacking (e.g. NHS or school records). Delegates suggested that the police should liaise with the CPS early on in investigations.
Another recommendation was that NGOs should create a best practice model for victim safeguarding, to guide and inform the police. The importance of establishing partnerships with businesses was highlighted, both from the point of view of improving business accountability, but also celebrating business best practice in responding to modern slavery. For example, The Co-Operative has taken great strides to respond to the issue by providing paid work experience to victims of modern slavery.

Delegates also called for partnerships between police forces and the Police and Crime Commissioners (PCCs). The PCCs can play a key role in ensuring that Chief Constables are aware of the scale and extent of modern slavery and the most appropriate responses. Those PCCs who are already engaged with the issue should encourage other PCCs to incorporate responses to modern slavery into their Police and Crime Plans. PCCs also have an important role to play in establishing vital networks for information sharing, whilst also holding their forces to account on issues of modern slavery.

Partnerships are also important for improving co-ordination between the police, the community and local authorities, in terms of the safeguarding and identification of victims. Other partnerships for the police to nurture will be with agencies such as the Department of Education, the National Crime Agency, housing services, healthcare services, agriculture, and immigration. Whilst efforts are being made to strengthen these links, opportunities to identify victims are being missed. Delegates also highlighted the importance of forming partnerships between NGOs, to encourage more collaborative working, and partnerships with policing and other relevant agencies around the world to help raise modern slavery’s international profile.

Establishing all the above partnerships would represent an ideal response to the need for collaborative, multi-agency working, but delegates also stressed that the ability to build and maintain them relies on budget and resources. In some cases, it might be more practical to tap into existing partnerships that could translate to modern slavery. One example was that the existing partnership response to the threat of OCGs could be adapted to incorporate more specialists on modern slavery.

5. summary of recommendations

The following is a summary of recommendations made by delegates at the conference. These recommendations are premised on enhancing the response to modern slavery. Recommendations include those for: law enforcement, first responders, Police and Crime Commissioners (PCCs), prosecutions, the private sector, increasing partnership engagement, working with the public, and public policy.

5.1 recommendations for law enforcement

To improve responses to modern slavery, the most important aspect is to enhance the law enforcement response. This involves improving investigative strategies, increasing the quality of victim interactions,
increasing training capacity, and augmenting the intelligence picture. Recommendations for law enforcement were:

1) **improve investigative strategies by:**

   - Involving the Crown Prosecution Service (CPS) early on in an investigation. Should any issues present, liaising with the head of the CPS Complex Case Unit.
   - Striving for evidential layering
   - Being mindful of the evidence that is missing from investigations (e.g. school records or health records)
   - Adapting and understanding the vulnerabilities of victims through a cultural lens and an appreciation that the life experiences of victims can be fundamentally different to our own
   - Taking more than one account of a victim’s story and understanding that the story will likely change as levels of trust increase. It is best not to take the first statement as final evidence.

2) **increase the quality of victim interactions by:**

   - Thinking about what you are asking and why, as well as how invasive you are being in your questioning
   - Ensuring that victims do not feel that they are in trouble
   - Speaking to individuals in private, using an interpreter where appropriate
   - Referring to the Modern Slavery helpline (08000 121 700) where queries arise
   - Placing the building of trust at the heart of the interactions
   - Avoiding stereotype traps (e.g. the assumption that people can only be ‘trafficked’ if they cross international borders)
   - Keeping victims informed about the progress of their cases on a regular basis.

3) **increase training capacity in order to:**

   - Recognise victims and offenders as well as increase the frequency of initial recognition
   - Use new investigating techniques
   - Facilitate a shift in officer perception towards a better understanding of cultural differences and the impacts of globalisation
   - Increasing front-line officer awareness
   - Understand the role that police have in Reparation Orders and Discretionary Leave to Remain cases
   - Increase knowledge of the National Referral Mechanism (NRM), particularly in relation to victim entitlements.

4) **augment the intelligence picture by:**

   - Enabling further research into the nature and scale of modern slavery
   - Increasing the frequency and quality of debriefs, to help the police to learn from best practice and share what does and does not work
   - Putting response theories to the test – e.g. how well does the ‘beyond border agency’ approach work in practice?
   - Learning from best practice in child sexual exploitation investigations.
5.2 recommendations for first responders

First responders have the ability to greatly enhance responses to modern slavery. Recommendations for first responders were:

- Use a victim-focused approach that places safeguarding first
- Enable information sharing related to ensure a high standard of victim care
- Use the Children’s Act to properly safeguard children
- Understand that traditional definitions do not necessarily apply; the reluctant victim defies our perception of criminality
- Give victims the benefit of the doubt and believe their accounts.

5.3 recommendations for Police and Crime Commissioners (PCCs)

PCCs play a vital role in responding to modern slavery. Delegates recommended that PCCs:

- Incorporate modern slavery into PCCs’ police and crime plans
- Ensure that Chief Constables are aware of modern slavery
- Establish vital networks for information sharing
- Hold forces accountable for their responses to modern slavery

5.4 recommendations for prosecutions

Modern slavery prosecutions can be improved by:

- Increasing the frequency of victimless prosecutions
- Increasing the amount of collaborative work with police during investigations
- Working towards a better understanding of the nature of modern slavery
- Educating juries to counter any pre-conceived notions, including stereotype traps

5.5 recommendations for the private sector

These recommendations focus on the private sector’s important role in responding to modern slavery:

- Gain a better understanding of modern slavery’s link to business
- Increase business involvement in police efforts to counter modern slavery – e.g. by increasing cooperation for financial tracking and improving transparency
- Increase business accountability
- Cut off the supply chain by enabling police to do cross border/boundary work
- Celebrate businesses who are making steps to eliminate modern slavery from their supply chains
- Frame responses to modern slavery in terms of corporate social responsibility

5.6 recommendations for increasing partnership engagement

Delegates cited partnership engagement as crucial to responding to modern slavery. Recommendations to increase partnership engagement were:

- Facilitate the mobilisation of PCCs
• Decrease individual agendas in favour of increasing collaboration
• Ameliorate victims’ journeys within and between services, by streamlining information sharing and minimising the number of times they have to tell their stories
• NGOs to create a best practice model to guide police through victim interactions, and ensure that it put into practice
• Tap into existing partnerships (e.g. those that tackle organised and serious crime) and include modern slavery specialists
• Have a single point of contact in partnerships
• Expand partnerships to include the weight of the civic architecture – e.g. fire, environment, health and local authority structures)
• Form a central hub to share good practice
• Learn from partnership practice that is already established

5.7 recommendations for working with the public

Working with the public is central to enhancing the response to modern slavery. This involves:

• Increasing public awareness and education
• Enhancing the public’s ability to identify modern slavery during their day-to-day activities – e.g. car wash facilities, nail salons.

5.8 recommendations for public policy

These below recommendations focus of public policy mechanisms to enhance the response to modern slavery:

• Decrease the frequency of age assessments and the time taken do any assessments, to minimise the adverse impacts of having to wait for the result
• Streamline victims’ journeys through the system, by enabling inter-agency work
• Regulate NGOs so that a minimum standard of care exists
• Improve the NRM as it does not protect victims enough – e.g. under the NRM, victims have to prove they have been victimised.
• Professionalise responses to modern slavery, but not so much as to limit them – e.g. potentially develop checklists of what-to-do in police responses to modern slavery.
• Secure funds to help safeguard victims and to secure the modern slavery helpline
• Strengthen the Modern Slavery Act by incorporating clear guidelines for businesses on how to operate to help prevent modern slavery
• Address the tensions and any contradictions between modern slavery and immigration policy
• Increase policing resources to help combat modern slavery
• Push questions forward in terms of how European Union security relations (as they relate to modern slavery) will be maintained post-Brexit
• Empower immigration officers to recognise the vulnerabilities of modern slavery victims
• Strive for global ratification of the International Labour Organisation’s Forced Labour Convention, 1930.
6. useful links

https://sustainabledevelopment.un.org/?menu=1300

https://www.gov.uk/government/speeches/defeating-modern-slavery-theresa-may-article


www.antislaverycommissioner.co.uk/media/1073/globalplusslaveryplusindexplus2016.pdf


http://www.lancashire safeguarding.org.uk/media/14351/W HAT-ARE-7-M INUTE-BRIEFINGS.pdf