

London Modern Slavery Leads Network

Annual Report 2020

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Chair's Foreword



This year was not without its challenges but it is testament to the collective value that members on the London Modern Slavery Leads (LMSL) network place on the need for partnership working and sharing best practice, that we managed to have three LMSL meetings this year, attended by between 35-45 officers. We also managed to set up and have our first meeting for the LMSL and Metropolitan Police data sub-group; alongside the LMSL's first annual conference, organised by the Human Trafficking Foundation (HTF), with more than 150 attendees from councils across London.

In 2018, when the London Borough of Enfield and HTF set about creating a pan-London group, hosted by London Councils, to learn about other councils' activities and share best practice, we would never have imagined its success in spreading awareness and key information, nor the widespread uptake from all councils, and partners in the NHS, as well as the regular input and attendance from the Local Government Association, the Independent Anti-Slavery Commissioner's office, the Mayor's Office for Policing and Crime, and the Home Office.

The LMSL network is proud to have been mooted as an example of good practice by the Mayor's Office, Anti-Slavery Commissioner and Home Office officials and hope our model is able to be replicated across the UK.

We don't yet know the full impact of COVID-19 – in terms of poverty, homelessness, debt and health outcomes. However, these have no doubt all been acute challenges across London and will have a knock-on effect on both potential and actual victims of human trafficking.

While there have been some very exciting developments in boroughs across London in the last year to better tackle modern slavery, including in my own council, there is still a long way to go for local authorities and other statutory bodies to effectively identify all victims and then adequately safeguard and protect them. However, the continuation of this group and the individual activities of its members gives us hope for the future.

I would like to offer my personal thanks to the Human Trafficking Foundation's Tamara and Rachel for their continued passion and commitment, and to all members of the network for their determination to put victims at the centre of everything we do.

Sharon Burgess

Chair of the London Modern Slavery Leads Network

(Head of Safeguarding Adults and Quality for the London Borough of Enfield)

The Independent Anti-Slavery Commissioner's Overview



My [Strategic Plan 2019-2021](#) highlights the importance of working in partnership to tackle modern slavery. Local authorities are a key partner within a multi-agency response to modern slavery and have an important role in identifying potential victims, providing appropriate support and in disrupting perpetrators. In bringing together Single Points of Contact from across each of the London Boroughs, the London Modern Slavery Leads (LMSL) network provides a helpful forum for local authorities and wider organisations to learn about the activities that are taking place in other areas, to share good practice and discuss common challenges with the aim of identifying solutions.

Frontline organisations, including local authorities, have faced unprecedented demand over the past 12 months during the COVID-19 pandemic which has in many ways exacerbated the vulnerability of those who were already vulnerable and is also creating new vulnerabilities to exploitation. This can include situations where individuals are urgently seeking income and may therefore be more willing to take on precarious employment and abusive or undesirable working conditions thinking that it is their best or only option. Despite the significant operational pressures that members of the LMSL network have had to respond to, I am encouraged to see that the commitment from members has remained and that virtual meetings have continued.

Over the past year I am aware that the LMSL network has formed a sub-group to explore further opportunities for sharing data across organisations. This is a welcome development and as I emphasise within my Strategic Plan 2019-2021, we must develop a better understanding of prevalence to allow policy and practice to be informed by more accurate data. I am aware that the LMSL network have also been looking at the role of local authorities in enabling survivors of modern slavery to access housing. Suitable and stable accommodation can be a fundamental part of recovery, but I continue to hear from practitioners how there are often many barriers to securing this in practice. I urge the network to continue to explore possible solutions including the potential of a reciprocal arrangement between local authorities as already exists for victims and survivors of domestic abuse.

This annual report highlights areas of focus for 2021 including prevention activity and child safeguarding. I absolutely agree that efforts to rescue those at risk and prosecute those responsible must be matched by a determined focus on prevention. My office is currently supporting the University of Sheffield in a piece of research to refine a framework for a public health approach to modern slavery. Once developed I hope that this will be a useful tool for the LMSL Network. In quarter 2 of 2020, for the first time there were more children referred into the National Referral Mechanism than adults. We know that a significant proportion of child referrals are being made by local authorities and that many of these referrals are linked to criminal exploitation. Whilst it is positive that these potential victims are being identified, it is clear that further work is needed to ensure that the response to safeguard and protect these children is both consistent and effective, and that perpetrators are brought to justice.

Dame Sara Thornton DBE QPM

Independent Anti-Slavery Commissioner

Context and Purpose

Modern slavery is a heinous crime that affects all communities of all ages, genders and nationalities, becoming a high priority in recent years, with the Government identifying it as ‘the greatest human rights issue of our time’.¹ It continues to be the fastest growing international crime, the second largest source of illegal income for organised criminality and targets the very fabric of our society. It can take many forms, some well-known - such as sexual exploitation, labour exploitation and domestic servitude - others less well recognised, such as organ harvesting, forced marriage and sham marriage.

Evidence of labour exploitation in high street fashion retail factories in Leicester and other parts of the country this year prompted the government to comment this “demonstrated how the abuse of people through this abhorrent crime continues to grow in front of the very authorities who should be eradicating this abuse.”² Meanwhile, criminal exploitation is increasingly visible on our streets and in our courts yet there is still much progress to be made to ensure victims are recognised and adequately protected.

Local Authorities are at the forefront of tackling this crime and supporting survivors to recovery, as statutory modern slavery first responders,³ providers of social housing and safeguarding services for adults and children, and through their disruption activities. London has been identified as a hub for county lines criminal exploitation while its geographical make up is ideal for modern slavery to thrive. It is particularly important that councils in London are supported in their efforts if the UK is to see crimes reduce overall.

The LMSL aims to support councils and the purpose of this report is to identify key activities and outputs of the LMSL Network.

Data

The number of people exploited in UK in modern day slavery is hard to gauge due to its covert nature. Estimates range from 10,000 to 136,000 people, but there is a year-on-year increase that now has overtaken the initial lowest-dominator figure.

In 2019, 10,627 potential victims were referred to the NRM, a 52% increase from the 6,986 referrals in 2018 and 32% (3,391) were female, while 68% (7,224) were male. In the year to March 2020, there were 7,779 modern slavery crimes recorded by the police, a 59% increase from 4,897 in the year to March 2019. However, the second quarter of 2020 saw a quarter-on-quarter decrease (-23%) in NRM referrals which is understood to be influenced by the effects of restrictions implemented in the UK as part of the response to the COVID-19 pandemic; lockdown led to less opportunities for identifying victims and halted some of the proactive police investigations into modern slavery in the Capital.

In 2019, the UK force recording most modern slavery crimes was the Metropolitan Police, accounting for almost 30% of all referrals (3,318). The City of London and London’s 32 Local Authorities referred a total of 754 potential victims to the NRM (67 adults and 687 children) – this is a huge increase on only a few years ago when around one hundred were referred in to the NRM across the whole of London and is testament to the work of all the members on the LMSL and beyond. However, the small number of adult referrals hints at the challenge statutory authorities face to achieve consent from adult victims that are

¹ “The greatest human rights issue of our time”: Theresa May commits to UK leadership on slavery (freedomfund.org)

² 2020 UK annual report on modern slavery (publishing.service.gov.uk)

³ National referral mechanism guidance: adult (England and Wales) - GOV.UK (www.gov.uk)

identified, and a gap in knowledge among frontline professionals best placed to identify potential victims and refer into the NRM.

In 2019, there were 915 individuals supported in Government's NRM safehouse accommodation and 4,247 in NRM outreach support, with 1,030 individuals exiting the Government care contract. This data also intimates the challenges faced by councils, NHS and police due to the small number of victims able to be actually housed in the Government's Victim Care Contract (VCC), which members of the LMSL have identified in their own practice and reported to the LMSL Exec.

Meanwhile in 2019, 68 defendants were proceeded against under the Modern Slavery Act 2015 on a 'principal offence' basis. The number of prosecutions peaked in 2017 at 132 and has since decreased, convictions however, peaked in 2019. In 2019 on an all-offence basis, there were 256 modern slavery offence prosecutions and 72 offences convicted. These numbers do not reflect the significant rise in referral numbers over the last few years but do expose the huge complexity of these cases and the challenges statutory organisations face in ending this crime and preventing further exploitation.

The UK Government Response - Updates

The UK Government committed to eradicating human trafficking and modern slavery, commencing with the passing of the Modern Slavery Act 2015 (MSA). This Act consolidated existing modern slavery and trafficking offences, and also created Trafficking Prevention and Risk Orders, while including the provision of child trafficking advocates for all child victims of trafficking, and gave local authorities a statutory duty, as a First Responder⁴, to notify the Home Office of any individual encountered who they believe to be a possible victim of slavery or human trafficking.⁵

The Home Office was compelled by court order⁶ to create statutory guidance under section 49 of the Modern Slavery Act 2015, consolidating existing guidance and setting out detailed support for victims for the first time. The LMSL Network provided the single collaborative council input into the Home Office's consultation on the statutory guidance throughout 2019. This is an illustration of the importance of the role of the LMSL Network in contributing expertise from local authority and NHS partners.

In March 2020, the Government published the Statutory Guidance. This guidance aims to provide "a clear framework of the support for some of the most vulnerable people in our society, clarifying the roles and responsibilities of frontline staff and local stakeholders, and setting out the support victims are entitled to and how this is accessed."⁷ The Home Office has made clear that they recognise that modern slavery is a rapidly evolving area and that the guidance is likely to be continually updated, which the LMSL Network will continue to support.

The Home Office had also worked with six local authorities on post-NRM housing and support pilots, including two in London. The aim was to develop and disseminate best practice for victims in the NRM to transition into communities and access local services, and this pilot concluded in March 2020. The Home

⁴ <https://www.gov.uk/government/publications/duty-to-notify-the-home-office-of-potential-victims-of-modern-slavery>

⁵ Modern Slavery and human trafficking, including support provisions and safeguarding of victims, is also referred to within the Care Act 2014 and the Homelessness Code of Guidance for Local Authorities. The UK is also a signatory to the Palermo Protocol as well as having committed to the Convention on Action Against Trafficking in Human Beings of 2005, and the UK's international obligations are further established in Directive 2011/36/EU of the European Parliament and Council.

⁶ <https://www.judiciary.uk/wp-content/uploads/2018/11/approved-judgment-k-am-co-2143-2294-2018.pdf>

⁷ 2020 UK annual report on modern slavery (publishing.service.gov.uk)

Office has agreed to provide an update from these pilots in the next reporting year. Meanwhile, individual councils involved in the pilots' initial feedback indicates London is not yet equipped with enough housing to support demand for accommodating survivors exiting support in the NRM, nor with the specialist knowledge to deliver support which is appropriate to trafficking survivors' individual needs.

During 2021 the Home Office plans to now pilot different models within local authorities of multi-agency decision making for child NRM referrals. Drawing on existing safeguarding structures, these will explore whether child victims would be better supported if local authorities were responsible for decisions regarding whether children are victims of modern slavery, rather than by the Home Office's NRM Single Competent Authority staff. At least two councils in London are hoping to be involved in this pilot.

In September 2019, the Home Office also implemented the Recovery Needs Assessment (RNA) to ensure that victims exiting the NRM receive a gradual tailored move-on plan with the aim of establishing longer-term stability by helping victims to transition out of Victim Care Contract (VCC) support and back into a community. In most cases, this will entail transition to mainstream services via local authorities, or the asylum support system. As of 30 June 2020, 1,132 RNAs had been completed detailing support needs required by survivors that could not be met by services outside of the VCC. Of all requests submitted, 17% of RNAs requested all three pillars of support (accommodation, financial support, and support worker contact) from the VCC. The most commonly requested support pillar is support worker contact: 75% of RNAs requested support worker contact, 52% requested financial support, and 6% requested accommodation.⁸ Members of the LMSL have received requests for their council to provide housing, both at this stage in the process and pre-NRM, especially when the victim/survivor has no recourse to public funds.

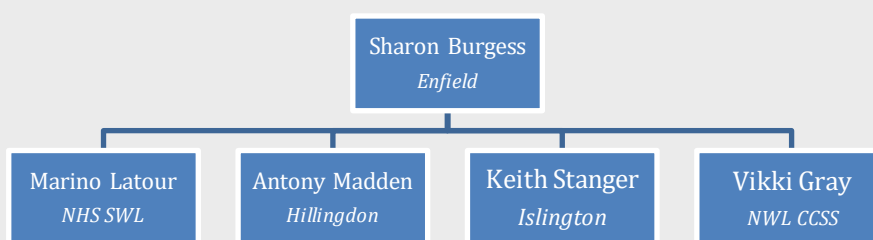
On 22nd September, the Home Office published the Government response to the Transparency in Supply Chains consultation, which committed to an ambitious package of measures to strengthen the transparency legislation in the Modern Slavery Act including extending the reporting requirement to large public bodies such as councils.

The Home Office also released an online modern slavery training module for First Responders and is embarking on an NRM Transformation Programme "to build on our world leading efforts to identify vulnerable victims and provide the support that they need to rebuild their lives. This will ensure that victims are safeguarded and supported based on their individual recovery need, with a focus on supporting the most vulnerable and making good use of existing access to mainstream services". The Home Office has presented on this to the LMSL as well as asked for and received feedback from members on this work – which is possibly the only frontline council input they are receiving at this time.

During COVID-19, councils received extra funding around homelessness but not on modern slavery, although the Home Office provided £1.73 million to the NGOs in the NRM contract, as part of the £750 million package announced by the Chancellor for charities during COVID-19.

⁸ However, one must be cautious about using this data as HTFF's understanding from a Home Office RNA workshop was that the SCA chose those easiest to move-on to request RNAs from. In most cases, the understanding is that survivors moved into asylum accommodation (which is unsupported and eventually requires local authority housing support), so out of context these figures can be misleading.

Architecture and Governance



The LMSL network was delighted to be able to have Sharon Burgess, Head of Adults safeguarding for Enfield Council, continue to chair the LMSL network. This year the LMSL also created an Executive Group to share decision making and chairing. Alongside previous Vice Chair Marino Latour, Safeguarding Adults Lead (NHS SWL) agreeing to continue for 2020, the new additional Vice Chairs who make up the new LMSL Executive Group were agreed as: Antony Madden, Head of Service (Children) for the LB of Hillingdon, Keith Stanger, Head of Community Safety and Crime for the LB of Islington and Vikki Gray, Associate Director of Safeguarding Adults (NWL CCGS). The first meeting in February was hosted by London Councils and the Human Trafficking Foundation remained the secretariat.

The Chair was also invited this year to sit on the MOPAC Slavery Board, while Keith Stanger heads the Community Safety Partnership in London and Marino Latour sits on the Safeguarding Adults National Network (SANN) as the vice chair and Vikki Gray sits on the UK's NHS Anti-Slavery group.

The LMSL invited a number of organisations to sit on the group. These now include MOPAC, the LGA, the Met Police's Vulnerabilities Unit, the Home Office, the office of the IASC and the London Fire Brigade also plans to attend in 2021. To support disseminating awareness of the modern slavery picture across London, the Metropolitan Police have agreed to provide updates on the London modern slavery picture based on crime reports as a fixed item in future LMSL meetings.

Objectives of the LMSL Network

Both the publication of the Modern Slavery Act's statutory guidance alongside the new requirement for public bodies to tackle slavery in their supply chains highlights the need for councils, NHS and police staff to prioritise slavery. With the rising challenge of increasing numbers, the upsurge in 'county lines' cases continuing across the capital, and the huge challenges created by COVID-19, the need for councils and health partners to work together with other statutory partners and recognise that modern slavery is not bound by borough borders or separate departments is ever heightened. The LMSL Network's view is for a pan-London approach to tackling Modern Slavery is essential. By working together to ensure good practice is shared along with trends and learning for improvement we can create better outcomes for survivors. The LMSL Network is committed to this approach.

The data in this report and the practitioner-led data from the LMSL Network meetings has highlighted a host of challenges including:

- supporting departments or local police to identify modern slavery,
- identifying victims but where the victims does not wish to enter the NRM or access support.

- A continued challenge from the previous reporting year is the need for clarification between councils and the NRM victim support providers on who should house a victim pre, during and now post NRM.

The LMSL has provided a forum for speakers including the police, Hestia (the main NRM Victim care subcontractor in London), the Independent Anti-Slavery Commissioner and Home Office to examine these system challenges and explore opportunities to create effective systems, services and responses to modern slavery and human trafficking for councils at both a strategic and operational level. The LMSL Network has developed into a community of practice where expertise can be brought together to prevent, identify and respond to existing, new and emerging issues in relation to modern slavery.

The group is committed to partnership working, prevention of exploitation and slavery and improving the safety of adults and children at risk of modern slavery across London. The group aims to promote a culture that recognises the underpinning principles from Making Safeguarding Personal, as guidance to the Care Act 2014 defines modern slavery as a type of abuse under safeguarding.

The LMSL Group agreed in its Terms of Reference in 2019 to:

- Establish a network of contacts to improve best practice and understanding and raise awareness about modern slavery.
- Promote the work that is occurring nationally and locally, and provide feedback on issues that are apparent within members' boroughs.
- Improve best practice and take forward specific pieces of work, which are of interest to the group, and will improve the safety and response to potential and identified victims of human trafficking and modern slavery.
- Act as an advisory body to members,
- Address challenges faced by local authorities,
- Raise awareness of issues across London,
- Identify trends and collate data
- Provide a collective voice so that short-comings can be identified and addressed,
- Identify opportunities for different types of intervention within the rapidly evolving landscape of modern slavery.
- Be the hub for LMSL in local authorities across London, with the aim of raising awareness about the crime, and setting up structures, tools and pathways that assist councils on how to prevent it, how to recognise it and how to report it and how to support survivors.
- Promote participation of service users and service providers into the development and delivery of modern slavery' initiatives and activities; attention will be given to the need to safeguard those who lack capacity as well as those at risk of trafficking and re-trafficking.

A survey of members found that some of the most useful elements of the LMSL they found included: sharing best practice, hearing from experts, understanding what other councils were doing to respond to modern slavery and understanding their statutory duties.

Comments included:

- *"Keeping updated with where MDS sits in other local authorities and what the police are doing around this centrally"*
- *"[i] used some of the presentations (Care Act & Housing law) in training I delivered across the councils"*

- *“Knowing there is a network available that I could access via email if an issue arose between meetings. Validating our approach.”*

Information from the Group is shared in a variety of way including the below:

- 66% forward information received from the network
- 42% provide presentations to their organisation
- 33% share the minutes from the group
- Others use the information in training

In terms of what areas respondents wanted the LMSL network to focus on for 2020, the emerging priorities were:

- Adult and child safeguarding
- Prevention
- Multi-agency working
- Informative presentations
- Community safety responses

Year 2020 achievements

The LMSL began 2020 meeting face to face, hosted by London Councils Although subsequent meetings have adapted to the challenges of Covid-19 and moved to Microsoft Teams (MST). The attendance over MST has been high testament to the value that boroughs place on this meeting even when pressured with the outbreak of Covid-19. A sub-group also met with the Metropolitan Police’s Vulnerabilities Unit, to work out an effective route and MOU to sharing data.

The network also received regular updates in between meetings relevant to councils such as the Statutory Guidance on section 49 of the Modern Slavery Act, information on changes to the National Referral Mechanism (NRM) referral process, events hosted by the LGA and London Councils such as a learning event on the NRM and child criminal exploitation, free training provided by NGOs, and a call for evidence from the Independent Anti-Slavery Commissioner on county lines and the use of statutory defence.

Relationship building

The LMSL has been a key way of building relationships between boroughs with members sharing their strategies, knowledge and practice with each other and also sharing information and developing relationships with key external partners as well as speakers. By way of example:

- The LMSL enabled the introduction to the new Heads of the Metropolitan Police Vulnerabilities Unit’s Partnership and Referrals Team
- LMSL members were able to hear from and then connect to London main NRM support provider, Hestia, and link them up with housing departments in their boroughs to continue the discussion. It was suggested Hestia work with local authorities to develop clear pathways for survivors from NRM and asylum support into local authority housing. This discussion is being furthered with some boroughs

- The Chair and Secretariat met with the Mayor’s Office for Policing and Crime (MOPAC) in June on working together. One option mooted was to merge MOPAC’s board and the LMSL Network but in the end, it was decided the LMSL and the London Modern Slavery Partnership Board added value in different ways and would remain as two separate groups to protect LMSL autonomy, but MOPAC would be happy to support the LMSL, including raising relevant issues to government bodies and be involved in collecting key performance data from the LMSL data group.

Council Engagement in National Policy

The LMSL has provided national organisations including the Home Office, Local Government Association, and Independent Anti-Slavery Commissioner’s (IASC) Office, with a vital route to receiving frontline council officer feedback. Alongside the LMSL’s vital role in ensuring council input into the Home Office’s Modern Slavery Act Statutory Guidance published this year, the group also fed into other pieces work, including answering a series of questions around housing and victims with high needs for the modern slavery unit; as well as feeding in information to the IASC’s call for evidence⁹ into the use of the Section 45 Statutory defence in criminal exploitation cases. Another area the Home Office asked for feedback revolved around what further training might be needed following the publication of the online first responder training. In response, the LMSL has agreed to set up a sub-group on training needs.

Crucially, it provided a space for council leads to be informed on updates from the Modern Slavery Unit and learn more about the operation of the NRM, including the Recovery Needs Assessment and the NRM Transformation Programme.

Informative Presentations

The LMSL Network heard from a range of expert speakers during the course of 2020. These included presentations from:

- The Independent Anti-Slavery Commissioner (IASC) Dame Sara Thornton
- National Police on the Police Operation Innerste (for unaccompanied children)
- A Presentation on Workers, COVID-19 and Brexit by FLEX’s CEO, Lucila Granada
- The Home Office’s Modern Slavery Unit and Croydon Council on the piloted Independent Child Trafficking Guardians (ICTG)
- The Children’s Society on Child Criminal Exploitation including “County lines” and how to use the NRM in these cases, and on how to use their tools
- The Home Office on how the NRM now works. As well as looking at the questions: what obligations do different actors in the system, including the Secretary of State for the Home Department, have to accommodate victims of modern slavery? And How can we ensure that victims with significant mental and physical health needs are being offered appropriate support outside of the VCC?

Presentation Case example:

Hestia (London NRM support provider) delivered a presentation on their work around support for people post-NRM, and a new project working with clients who have received a positive NRM decision and are looking at a transition out of service.

⁹ <http://www.antislaverycommissioner.co.uk/media/1478/the-modern-slavery-act-2015-statutory-defence-call-for-evidence.pdf>

Three key issues evident in their first month in the role related to Housing: Proving that clients are in priority need for accommodation; Suitability of housing for clients, including issues around complaints and monitoring; and clients being asked to repeat their story.

i.e. When LAs are assessing what houses are suitable as part of the personalised housing plan, they are finding many are in B&Bs surpassing 42 days. Hestia is working with clients in situations where there are clear safeguarding risks but there is no monitoring or check-in from housing advisors working in local authorities. Instead, clients are just left there until secure housing is found and this could be years.

i.e., They referred a case of someone who had been experiencing issues in temporary accommodation with one local authority for 14 months. She had been sexually exploited from traffickers and was in hostel accommodation. She had men coming to her door at 2am and there were issues around drugs and alcohol use in the property. Marijuana smoking in the property caused her child health issues. There were faeces around the house left by other residents. Issues were raised by the client as safeguarding issue but the housing manager said because it wasn't raised in the right department, it wasn't actioned.

i.e., Housing departments not being aware of a Positive Conclusive Grounds (+CG) decision and asking survivors to retell their story (risking re-trauma) rather than recognising the +CG decision as proof of their trafficking experiences.

Challenges facing Hestia in addressing these issues:

- Hestia support is subject to Home Office approval and often will be cut off before clients are supported into suitable housing, even against the recommendations of the caseworker, so often clients are left to face these issues alone
- Unfamiliar with local authority housing structures

Recommendation:

- Link up with LMSL member's housing teams
- Create a clear pathway to support
- Have a SPOC that Hestia can work with to refer into councils

Examples of learning

The aim of the LMSL is to share best practice and also provide lessons in how to do best practice referrals, identify victims and better support victims of modern slavery. Examples of the type of lesson provided included:

- The Home Office provided an outline of how to do a referral and use the new digital NRM, the decision-making and identification process, explained as distinct from the victim care contract as the system for provision of support for those whose claims are being considered as part of the NRM
- The MPS described Project Enterprise, which will bring together the National Crime Agency (NCA), Department for Work and Pensions (DWP), Gangmasters' Labour Abuse Authority (GLAA), London Fire Brigade (LFB) and Local Authorities including Keith Stanger (Islington modern slavery lead). Enterprise will involve linking in agencies to every investigation and looks to improve collaboration between practitioners working in modern slavery.
- West Hertfordshire hospitals had led on the development of Standard Operating Procedures (SOP) and models of practice, including supporting police-led covert operations in Hertfordshire

where victims of MSHT are working within predominantly sex work, but more recently around forced labour. The focus of the SOP is an introduction to health and focus on safe and well for victims and non-victims in covert operations. There has been great success and they recently attended their 20th warrant. They have developed safe and well packs to share these across the local authority in primary care and in the acute trusts to give clinicians guidance and a useful toolkit if faced with an adult victim.

- FLEX had three key actions that can be taken when it comes to prevention labour exploitation: Inform workers about their rights and where to seek help; Carry out proactive health and safety inspections that monitor working conditions; Adopt secure reporting policies to build trust among vulnerable populations and ensure that the most vulnerable groups aren't fearful of reporting abuse and seeking help for fear of immigration consequences

The group members also updated each other on trends they were seeing throughout the year including:

- Greenwich shared they are seeing a trend in which Vietnamese women are found by midwives presenting very late for pregnancy, having babies, being 'looked after' by matriarchal figure under suspicious circumstances and then disappearing.
- Southwark seeing signs of modern slavery in forced marriage situations, for example a vulnerable adult not able to escape the family, but this is not being recognised by police as modern slavery.
- Sexual exploitation appears to be particularly prevalent in East London but it is unclear whether this is due to underreporting in other boroughs
- The Children's Society noted evidence of OCGs operating in supermarket car parks too.

COVID-19 raised a lot of new concerns as well as forcing new ways of working. Some of these shared with the LMSL network include:

- HTF informing the group on safeguards for survivors COVID-19: In light of concerns around moving people in the pandemic, survivors in NRM safe house accommodation were able to remain where they were until 6th August, when exit procedures were meant to continue as normal.
- Information was shared with the LMSL from other UK regions around the targeting of homelessness hotels by traffickers prompted awareness raising among rough sleeping and homelessness teams
- Alarming increase in risk of destitution or homelessness, linked to large number of workers who don't qualify for Government COVID-19 support scheme or sick pay
- The LSML Network recommended pressing this with housing teams where possible as there may be a rise in referrals moving forward and potentially survivors at risk of destitution and homelessness in your local area.
- The Children's Society said they had received reports of children going missing for longer periods of time and further away from home. OCGs were moving to operating indoors rather than on the street because people were expected to be indoors. The Children's Society saw an increase in the use of trap houses.
- COVID-19 has heightened dangers facing young people and they are still being exploited and groomed. Those exploiting do not care about social distancing or the spread of the virus.
- There have been concerns that children and young people are out of school meaning that professionals like teachers are less likely to be able to identify if they need further support.

- Camden and Islington highlighted some of the challenges they are seeing at initial accommodation centres. It is important the health screening questions are trauma sensitive and that GPs have support/access to safeguarding leads. NHS in NW London have been supported by Helen Bamber Foundation.

Good practice examples

Members of the LMSL Group are developing significant good practice models locally. Haringey for example has a new Modern Slavery Coordinator. They are focussing on support from pre-NRM through to long-term support needs being met. Haringey's current workstreams include: 1) developing a referral pathway for victim identification and support 2) collecting data on victims in Haringey 3) training staff to be able to identify potential victims. The Central West London partnership has a new data collection model that worked to include soft intel from a range of agencies including the NHS and NGOs, which has led to proactive intelligence-led campaigns. Westminster has also received funding from Ministry for Housing Communities and Local Government (MHCLG) for a modern slavery and homelessness navigator role and has successfully been operating the Multi-Agency Case Conference approach for one year in collaboration with The Passage. Greenwich meanwhile is carrying out modern slavery training and developing their multi-agency processes. Their borough police have developed pathways from investigation. Training emphasises that police officers need to take ownership and they have SPOCs in all areas in the borough.

Enfield Councils Modern Slavery Strategy

Enfield Council presented on their new model of tackling modern slavery. They have signed up to the Charter Against Modern Slavery and have produced a modern slavery strategy. Funding was also secured to establish London's first Modern Slavery Team which comprises of two investigatory officers from the local authority and support from dedicated police officers comprising of a DCI, DI and two DS. The team completes place-based investigations to help secure criminal convictions. MASH teams will be noting all NRMs. The team also engages in borough-wide awareness raising by doing visits, talking to people to establish community-based links and facilitating training.

The Modern Slavery Team has been operational for one year now. The team have had a very busy first year and have supported the Central Specialist Crime team with five raids in the borough. The team join police colleagues on raids to ensure a holistic approach is provided and to ensure the best outcomes are afforded to all potential victims. We have representatives from health, housing, modern slavery team and other council departments to provide a multi-disciplinary approach. It has proven to be beneficial to have people on the ground from the team and have these pathways and Single Point of Contact (SPOCs) in place within the council.

The Modern Slavery Team have been commended by the Central Specialist Crime Team for the pathways we have established in Enfield and they have been viewed as best practice for supporting potential victims of modern slavery. The team has agreed to train jointly with the police to show other local authorities and BCUs how we operate and to share best practice. The team has established close links with central policy team and we regularly feedback to the Home Office to lobby for change to continue improving outcome for potential victims.

The team has joined forces with Housing to establish a MARAM – a meeting to discuss complex cases of rough sleepers to establish their needs and surrounding risks and to prevent re-trafficking. We also have our action plan regularly scrutinised by our Modern Slavery Board who meet quarterly. We have also created a pathway with the housing and mental health so when victims are identified they are able to be housed quickly and have a fast-tracked approach in supporting with their mental ill health via secondary services.

LMSL Conference

Following examining legislation around housing and safeguarding, it was agreed that in 2020 the LMSL would plan a conference and target it at officers in councils – possibly those based in legal teams and housing – where there are potentially gaps in knowledge around slavery. However, with the release of the Modern Slavery Act Statutory Guidance for section 49 and increasing evidence that councils did not have the resources to engage with the policy, it was decided to focus on the obligations in the Statutory Guidance and to delay the housing conference to 2021.

160+ people attended the conference, which aimed to both outline obligations in the guidance and an understanding of the implications on practice. Examples of good practice interpretations of the guidance in council strategies were included and resources to support councils in developing their policies. Members of the LMSL modelling good practice in London contributed to support shared knowledge, including:

- The Central West London partnership on partnership working
- Croydon Council on successful multi-agency working with the ICTG model (recognising that the Home Office is now seeking to roll this out in the coming year or so)
- Westminster City Council and The Passage on the Multi-Agency Case Conference approach
- Enfield Council on their modern slavery team and interpretation of the Care Act to deliver support to survivors

We received great feedback including the below:

- **“It was brilliant. Intense but brilliant.”**
- **“this has all been so interesting - such hard work going on across the capital which is great to hear”**
- **“Thank you so much for organising this huge event. Really insightful. Congratulations”**
- **“Thank you very interesting and useful,”**
- **“it has been fantastic and I look forward to reading the rest of the presentations”**
- **“It has been a very enlightening morning for me.”**
- **“This is amazing, would like to do a more on county lines”**
- **“This presentation [on CCE by SPACE] really needs to get out there - it's really informative”**
- **“Thanks guys. So much information shared from the speakers - some useful contacts to work with moving forwards and conversations to take place moving forwards.”**

LMSL Data Sub Group

When the LMSL network first met in 2019, the problems around data were immediately identified and the group responded to the challenge by first agreeing to collate data from members. This proved a challenge and in 2019 the Central West London (LBHF, RBKC and WCC) partnership discussed how they collect anonymous data from multi-agency partners and presented samples from their interactive dashboard, which provides a rich picture of modern slavery in the boroughs.

In 2020, the new Vulnerabilities Unit in the Met Police was formed and its then head of Investigations agreed to work with the LMSL Network to share data. This is a really exciting and ground-breaking new development in the relationship between London Councils and the Met Police and paves the way for further work around data next year.

After first sharing more generalised data including the below; the MPS agreed to another meeting to look at data in more detail.

1. East Area (Havering, Redbridge, Barking & Dagenham): 215
2. West area (Hillingdon, Ealing and Hounslow): 178
3. North East (Waltham Forest and Newham): 164
4. North West (Harrow, Barnet and Brent): 151

For the first time, the councils were presented with an in-depth MPS spreadsheet of modern slavery crimes in London, broken down by boroughs as well as other streams, and obtained from referrals into the National Referral Mechanism and Duty to Notify submissions (previously MS1). The total number of crime reports included go back to August 2018 and demonstrated amongst other things, that around March/April (when lockdown measures were implemented), the numbers of crime reports fell. Numbers have not increased back to the highs seen before lockdown yet, but are similar to the numbers being seen last year.

There were 2104 modern slavery investigations reported into the Met from London boroughs in a two-year period, usually following an NRM referral as the Home Office share referrals with the Met. If there is no existing crime report they generate one. Modern slavery police investigations do consider bolstering protection but are primarily focused around prosecution.

The MPS asked LMSL members the following:

- Councils to consider why their referral numbers are low and look at where are low (NRM data shows this. See accompanying spreadsheet and briefing)
- As numbers of modern slavery crimes in London increase it is crucial to consider why, how and where the numbers are rising and work collaboratively to address the issue
- Key Question: How can we build on this picture to understand pan London profile so we can be better equipped to know where these challenges are and then what resources are needed?
- What data do councils have that could contribute to the picture?
- Need to look at how to consider soft intelligence in tandem with the hard data, for example:
 - Local Authority safeguarding data;
 - the NHS Trusts - do not make referrals to the NRM as they are not first responders but do raise internal reports and external referrals to local authority or police
 - Housing colleagues

- MPS emphasised that the key is identifying trends with soft intelligence and police intelligence thus targeting resources better as a result

The Chair of the LMSL Network also asked how data is already being used by LMSL, and answers included:

- Using the data to inform discussions to raise the profile and get it in to priorities - would need more info about the population to do that effectively but this is a start.
- Note it in our Strategic Assessment in Lambeth
- One borough is using the data to create a problem profile of modern slavery. They will then be using for a business case for central funding (rather than out of CSP/SAB funding) to put a better system of support and awareness in place. They will also be using it to target particular wards for awareness raising and intervention

Challenges

The LMSL was able to share and, in some cases, problem solve various challenges and concerns that arose, including:

Data-sharing

- The majority of boroughs have highlighted an issue around robust information to evidence the need for funding and to inform proactive approach. Across London, NRM data shows low numbers of referrals by the Local Authorities and there is no published data showing cases referred by other First Responders within each borough

Training

- NRM referral forms often lack the detail needed to progress an investigation
- A need for training frontline local authority staff
- All local police officers in Basic Command Units (BCUs) need training on modern slavery and options for support and will expand training to local teams once the specialist team is trained

Children

- A standardised response to county lines from the Met Police to reduce variation between processes across boroughs
- The challenge of how to respond to young trafficking victims arriving into social care in first 72 hours and how-to relationship-build and safeguard

Survivor Support

- Adult victims not wanting to enter the NRM because of no guarantee for future rights and support, leaving them in exploitative work and limited options, especially for those with NRPF
- The lack of housing options for councils, for victims both pre, during and post NRM, alongside the expectation of the Victim Care Contract for councils to house victims even during the NRM period
- Delays in accessing support for survivors on referral into the NRM
- A need for a pathway for survivors leaving the NRM and requiring support from the local authority
- A need to develop information around the number of survivors receiving NRM support in respective boroughs, meaning there is no way to assess the need for resource to meet longer-term support needs

- The challenge of court backlogs being significant because of the halt during the pandemic. Modern slavery trials expected for this year have been delayed

Next Steps

The LMSL network will continue to work to develop and build on its successes from the last year and continue to establish a network, promote and share good practice work occurring locally and nationally, while acting as a collective voice to address challenges and raise awareness across London.

One notable proposal in the annual survey from members was the need to include the voice of the service user. Over 70% of respondents in our last survey said they would like to have greater input of a survivor voice. HTF has been working with Survivor Alliance and Hestia to set up a new London survivor network. They have had several meetings in the last year, including most recently where 22 survivors attended. There is a possibility to explore developing a relationship, should they want it, with this group to ensure more survivor voices are heard in the work of the network.

As this report is published, London is still in the grip of the UK's COVID-19 crisis, although a vaccine has started to be rolled out. The long-term impacts of this on modern slavery should not be underestimated and the LMSL plans to keep an eye on how this situation continues to progress.

The incredible success of the LMSL and HTF online webinar in November 2020 and the repeated request of attendees for other similar events, means that the LMSL Network and HTF hope to create a repeat event later in 2021.

Alongside this, the creation of the Data subgroup and sharing of data from the MPS marks a new pathway of multiagency working and data collection between councils in London and the Met Police, and the LMSL Network and Police are currently draft a Memorandum of Understanding between the key stakeholders and plan another meeting early in 2021. There is also a plan to set up a sub-group around training to improve consistency.

A number of critical next steps include a plan for the LMSL Chair to write to the Home Office to ask for more involvement from the Ministry for Housing, Communities, and Local Government (MHCLG) and a possible workshop next year with their colleagues in both departments and the LMSL network.

The Chair also plans to invite the Director of Housing to the LMSL Network going forward as well as for the group to decide if it wants to create a cross-border sharing protocol around housing, as exists for domestic violence, which would be supported by the IASC.

Appendix

Figure 1.

Graph to show adult and child NRM referrals made by London councils in 2019.

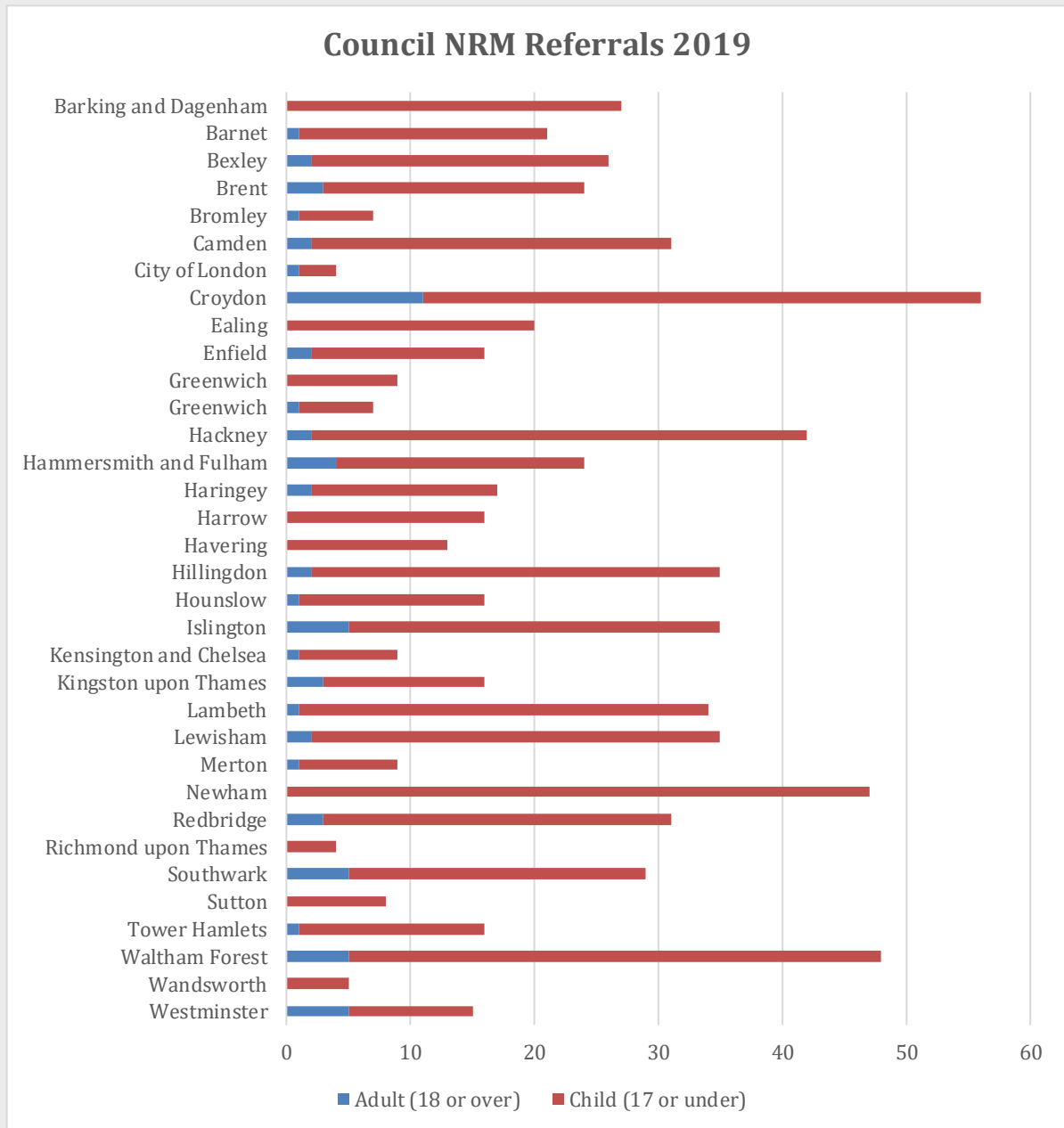


Figure 2.

Graph to show total NRM referrals made by London councils in 2018 and 2019.

Council NRM Referrals 2018 & 2019

