



MAYOR OF LONDON POLICE & CRIME PLAN 2021-2025

Anti-Slavery London Working Group
Consultation Submission

Signatories:

AFRUCA Safeguarding Children, Anti-Slavery International, Anti Trafficking and Labour Exploitation Unit (ATLEU), Anti-Trafficking Monitoring Group (ATMG), Bakhita Centre for Research on Slavery, Exploitation and Abuse, BASNET, Caritas Bakhita House, Croydon Community Against Trafficking, East European Resource Centre, Ella's, Emerge Worldwide, Every Child Protected Against Trafficking (ECPAT UK), Focus on Labour Exploitation (FLEX), Helen Bamber Foundation, Hestia, Hibiscus Initiatives, Hope at Home, Hope for Justice, Housing for Women, The Human Trafficking Foundation, Kalayaan, Latin American Women's Rights Service (LAWRS), Love146, The Passage, Rahab, SJOG Hospitaller Services, The Salvation Army, Shiva Foundation, Shpresa Programme, Street Talk, Tamar, The Traveller Movement, Unseen UK & Modern Slavery Helpline, VITA

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ABOUT US

The Human Trafficking Foundation coordinates the Anti-Slavery London Working Group (LWG), consisting of over 90 statutory and non-statutory member organisations. The LWG comes together to identify gaps in the response to modern slavery in the capital and works collaboratively to address these challenges.

The LWG is a group of expert, largely frontline, stakeholders working in pan-London services, from within statutory and non-statutory sectors. Members include NGOs, diaspora community groups, NHS professionals, the Metropolitan Police Central Specialist Crime Team for Modern Slavery, Government bodies, (including the Home Office and Department for Levelling Up, Housing and Communities) law firms and academics. The Mayor's Office for Policing and Crime (MOPAC) is also a member of this group.

The LWG is the only pan-London Anti-Slavery partnership of its kind. Members can raise issues they've encountered in London, (for example in relation to a survivor's case) and the LWG shares expertise, good practice and tools and works together to develop solutions. The LWG also provides collective feedback to consultations and to calls for evidence. The LWG contributed to the Mayor's consultation on the Police and Crime Plan for London 2017-2021ⁱ and called on the London Mayoral Candidates to prioritise modern slavery if elected in May 2021. All five of the major candidates, including Sadiq Khan, signed the pledge which agreed he would focus on a strategic response to modern slavery; a survivor-first approach; prioritising partnership working; training for first responders and promoting equality, diversity and inclusion.ⁱⁱ

This consultation submission for the Mayor of London's Police and Crime Plan 2021-25 was put together by a group of non-statutory members of the LWG with contributions by some statutory organisations.

EXECUTIVE SUMMARY

MOPAC held a consultation with the LWG in December 2021 to hear their views on the draft police and crime plan (PCP). The following document is a summary of these and subsequent discussions and are the views of participating members of the LWG. The format is based on the four priorities outlined in the draft police and crime plan, along with monitoring and evaluation which it was felt was essential for ensuring progress is made.

Overall, the view of the LWG is that the priorities in the draft PCP are correct and we welcome that exploitation is mentioned explicitly throughout the plan and especially under the fourth priority: Protecting People from Exploitation and Harm. We welcome the prioritisation on building trust in the criminal justice system as it remains a challenge both for victims and survivors of exploitation, and for third sector organisations who have received an inconsistent response to cases of modern slavery from the Metropolitan police.

The main concern of the LWG is that none of these priorities will be possible without secure reporting policies and procedures in place, allowing safe reporting for victims of crime who have insecure immigration status. People cannot be protected from exploitation and harm, have trust or confidence, or access support if they are concerned that once they contact the police their details will be shared with the Home Office and they are at risk of detention or removal. We know in relation to modern slavery, human trafficking and exploitation that perpetrators use threats of detention and deportation as a means of controlling victims and preventing them from escaping their situation and seeking help. Especially given the super-complaint on policing and immigration statusⁱⁱⁱ, the Mayor of London has an opportunity to be a leader in this area and set a precedent by enacting secure reporting policies and procedures so that victims of any crime feel safe to report without repercussions due to their immigration status. This really would 'make our city a safer place for everyone.'

An additional element that could be strengthened within the PCP is Partnerships. Collaborative working is key in preventing crime and ensuring that there are no gaps for victims to fall through. One agency alone cannot be expected to be an expert in responding to the needs of all victims of crime. Working in partnership with organisations which have knowledge of particular cultures or specialist insights into specific community practices can strengthen the response for both victims and agencies; as can hearing directly from the victim themselves and taking their wishes into consideration.

Tightening partnership working would also help to create a more consistent approach across the city. Currently individual Basic Command Units (BCU) respond differently to each form of modern slavery. Whilst acknowledging that approaches should be adaptive to the local context, and that funding will play a part in this, inconsistency of approach creates another barrier to effective partnership working across boroughs and ultimately the experience of victims.

It's vital that the PCP is implemented, not solely by the Central Specialist Crime Team for Modern Slavery, who are already experts in this field, but ensuring there is an appropriate, trauma-informed consistent response across all BCUs and the justice and probation teams. Based on modern slavery and exploitation being a crime which transcends area boundaries, we would also encourage the Metropolitan Police to work with other forces to strengthen information sharing, collaboration and consistency. The LWG welcomes working with MOPAC and the Metropolitan Police in partnership to tackle modern slavery and exploitation in the capital.

BACKGROUND

Modern Slavery is set out in the Modern Slavery Act (2015) and Statutory Guidance and can be thought of as an umbrella term that encompasses human trafficking, slavery, servitude, and forced or compulsory labour.^{iv}

Human Trafficking consists of three components:

- the act - *recruitment, transportation, transfer, harbouring and receipt of an individual.*
- the means - *threat or use of force, abduction, fraud, deception, coercion or the abuse of power and vulnerability.*
- and the purpose – *the exploitation, such as sexual exploitation, forced labour, criminal exploitation, domestic servitude and organ harvesting.*

For child trafficking, the 'means' is not necessary as children cannot consent to their own exploitation.

In 2020, there were 10,613 potential victims referred to the National Referral Mechanism (NRM)^v – the government's framework for identifying victims of modern slavery in the UK. Almost half of these referrals were children. As was also the case in the previous year, the Metropolitan Police accounted for almost 30% of all referrals made into the NRM in 2020, highlighting the scale of the issue in London. With its transport links and gravitational draw, London is the UK hot-spot for modern slavery. Particular trends include people who are homeless being repeatedly recruited for forced labour, and children criminally exploited for 'county lines' drug trafficking. Behind every one of these statistics is a person; therefore, preventing and addressing modern in the capital slavery must be a priority.

REDUCING AND PREVENTING VIOLENCE

The LWG welcomes the priority around the reduction and prevention of violence. We suggest that the word violence is amended to 'abuse' or it is made clear that violence does not need to be of a physical nature.

'Preventing Violence with a Public Health Approach'

The LWG welcomes a public health approach to preventing violence and abuse. The Independent Anti-Slavery Commissioner worked with the University of Sheffield and Public Health England to develop research^{vi}, which includes a report, an interactive framework and a guide for Anti-Slavery partnerships to address modern slavery through a public health lens, and we encourage MOPAC to work to incorporate this into their learning and approach.

'Preventing and reducing violence affecting young people'

Preventing and reducing violence affecting young people speaks to the rise of child criminal exploitation (CE) and so-called 'county lines' in the capital and we welcome a robust response to this and the Mayor's determination 'to end the criminal exploitation of young Londoners.' Whilst acknowledging that the PCP is a strategic overview, more detail is required on how exactly the MPS will 'crack down on organised criminals preying on young people.'

The LWG would welcome an independent review of the Rescue and Response programme to evaluate the difference it has made and clarity on MOPAC's response to criminal exploitation once the project ends this year. We would also welcome an expansion of this work more broadly to respond to criminal exploitation as a whole, as children and young people are also exploited for weapon offences, financial and benefit fraud or other criminal activity. The 'county lines' focus of the rescue and response team also tends to exclude young people exploited in the drugs industry that remain localised within London. There needs to be more joined up working and a recognition that exploitation often involves multiple typologies.

We recommend amending the following sentence to ensure tackling exploitation remains at the centre of the response to child criminal exploitation: 'MOPAC and the VRU will intensify focus on understanding and addressing the relationship between drugs, violence *and exploitation* in London'. We would also request that criminal exploitation is a key component within the brief of the London Drugs Commission.

With regards to the 'gender responsive approach' to young people impacted by violence, the LWG would like the PCP to not only address the less-visible needs of young women and girls involved in CE, but also the sexual exploitation of boys and young males which is often concealed by victims and overlooked by statutory services. It's vital that it is not only girls who are seen as vulnerable in relation to gang violence and boys as criminals. Child exploitation is a form of child abuse and children can never consent to their own abuse. The PCP must ensure that all children who are exploited receive safeguarding responses regardless of their gender and there needs to be a child protection response first and foremost.

'The Mayor's Helping Londoners into Good Work mission'

The LWG welcomes the 'Helping Londoners into Good Work mission' to 'support Londoners who have been disproportionately impacted by the pandemic to gain skills and to access good jobs.' We know that the pandemic increased the risk of exploitation, including labour exploitation, with vulnerable people forced into desperate situations. The LWG would recommend the mission includes information about workers' rights and identifying unscrupulous job offers, helping people to avoid exploitation.

INCREASING TRUST AND CONFIDENCE

The LWG welcomes Increasing Trust and Confidence as a priority. The experience of the frontline organisations in the group is that victims and survivors of modern slavery often do not trust the police and authorities. This is even more pertinent if the victim is black, is from a minoritized ethnic background, has insecure immigration status, has had previous negative interactions with the police, or historic criminal convictions. If the Mayor wishes to increase trust and confidence, victims a) need to be believed and b) need to be viewed as victims. Far too often, the LWG comes across cases where the police have not believed a victim's experience of modern slavery or have created an environment in which victims do not feel comfortable to disclose their experiences; police have interrogated them for hours; arrested them for criminal acts they were forced to commit under modern slavery; or referred them to the Home Office for 'immigration offences' when they've come forward for support.

Case Example:

B is a survivor of international and domestic trafficking. She came to the UK in 2006, worked for 10 years for an exploitative employer as a live-in domestic worker. The employer had complete control over B's visa applications. B was dismissed and found live-in work with another employer who was also exploitative. B was unaware her latest visa application had been refused. A passer-by contacted the police with concerns B was being abused. The police arrived, interviewed B in front of her trafficker, then ran an immigration check on her which revealed she was undocumented so she was arrested, put in a cell and later transferred to Yarlswood detention centre. B instructed a legal firm whilst in detention who asked The Salvation Army to complete a NRM referral for her. She was then released into safe accommodation. She later came to Kalayaan via a homelessness charity as she ended up destitute and homeless following a negative CG decision which relied heavily on the answers she gave the police whilst in front of her trafficker. B suffers from hypervigilance and anxiety.

Secure Reporting

The main request from the LWG is to include a clear commitment within the PCP for the creation of 'secure reporting policies and procedures' to ensure details about a victim's immigration status are not shared with the Home Office if they come forward to report a crime. Removing this barrier would give confidence to victims who do not feel able to access safety and support because they have insecure immigration status. Referrals to the Home Office should only be made in cases where a victim consents and wishes to claim asylum or enter the NRM.

Not only would an innovative safe reporting system mean people are able to report crimes and access support without fear, it may also help improve conviction rates for perpetrators and protect people who are undocumented from exploitation in the first place as exploiters won't be able to use the threat of immigration enforcement so easily against them.

An innovative safe reporting system is desperately needed and would speak to the commitment to *Promote and lead a survivor-first approach that ensures protection and safe reporting for victims and witnesses of crime* in the pledge signed by the Mayor during his re-election campaign. The Mayor of London has an opportunity to be a leader in this area and make London safer for all.^{vii}

Example of good practice:

In 2006, the Amsterdam police realised they were facing difficulties carrying out their police duties of fighting crime and protecting people in areas of the city with a high number of undocumented migrants, due to the lack of trust these groups had on the police. As a result, police started making contact with the communities in those areas to establish a relationship of trust that would make it possible for undocumented people to report crimes and for the police to gather intelligence from these groups.

Every three to six months, the same police officers would host large meetings where the community could speak freely about their experience with law enforcement to understand the barriers they faced in engaging with the agency. These meetings served as a way for police officers to reflect on their role and to identify which strategies should be taken forward. In 2013, this system was expanded across the city of Amsterdam through a pilot called "safe in, safe out", in which undocumented people could report crime without having the police act upon their immigration status. After a year, the police conducted a review of the pilot to assess if it should be continued, concluding that it should. In 2016, this policy was instated at national level; however, application is inconsistent, with some police officers still acting against it.

Victim first and foremost

There were 10,613 victims of modern slavery referred to the NRM in 2020 and 49% had an element of criminal activity as part of their exploitation. This is a huge issue for all police forces, but mainly the MPS as a third of all victims are in London. This requires its own response and a shift in police mentality where victims of criminal exploitation are viewed as victims first and foremost. The LWG believes a clear agreed definition of criminal exploitation would help with this.

Regardless of the form of exploitation, the LWG spoke of a 'culture of disbelief' within the police when responding to cases of modern slavery. This speaks to a lack of understanding of the vulnerabilities and drivers of modern slavery and the means used to control people. It also refers to modern slavery being viewed through an immigration lens and demonstrates a lack of understanding of the grooming process and the fact that children cannot consent to their own exploitation.

An example is that safeguarding partners in health and children's social care report concerns regarding the differential treatment of separated or unaccompanied children received from law enforcement, particularly when participating in multi-agency safeguarding measures, missing and disbelief of age.

Case Example:

M is 16 years old boy from Albania who came into the care of Children's Services in a London Borough. He presented with various child trafficking indicators including concerns about a debt, physical injuries and suspicion he was being used to carry drugs. His social worker reached out to the safeguarding partners in the police and health to arrange an emergency strategy meeting with a view of determining next steps, including safeguarding and referral into the NRM. They found it impossible to get the police to attend the meeting and were not engaging regarding further steps in line with their statutory duties under the Working Together to Protect Children guidance. The officers made various discriminatory comments regarding M and other migrant children in that local authority's care. M went missing shortly after and his social workers expressed significant concerns he had likely been re-trafficked. They remain frustrated at the lack of investigative steps in this missing investigation. Social workers expressed continuous issues in what they deemed to be a 'culture of disbelief' amongst their law enforcement colleagues, particularly regarding the age of migrant children, the allegations of exploitation not being investigated and not taking seriously when migrant children go missing.

Use of language

Language and narrative have a huge role to play in increasing trust and confidence. A shift to believing victims and identifying them as such can only work if it goes hand in hand with a shift in narrative and the use of language used both to the victim and when referring to the victim. Members of the LWG have multiple examples of occasions where police officers have used language in front of a victim and/or a professional involved in their care that implies they do not believe them as well as examples where it is written on NRM forms that they do not believe that the person they are referring to is a victim. First Responders need to be made aware through training that they are referrers and not decision makers; referrals to the NRM should be made when there are indicators of modern slavery present and not based on the First Responder's personal belief.

The use of language can directly influence outcomes for victims; for example, a shift from the use of the term 'plugging' to acknowledge the realities of 'coerced internal concealment'; or a move away from 'money mules' toward 'financially exploited children' can influence the response victims receive. In addition, the use of words such as 'claims' rather than 'states' on an NRM form is likely to cause their referral to be rejected and shows the officer has no trust in the victim, leading them to have no confidence in the police in return. The use of language needs to play a central role in training and police guidance in order to change the narrative for victims.

Taking time to build trust

We know that when police officers do believe an adult victim of modern slavery, they often struggle in their role as First Responders to gain the victim's consent to enter the NRM. Survivors need time to develop trust before disclosing their situation, recognising themselves as victims or agreeing to support. It's vital for the police to work closely with third sector partners to give victims and survivors time to develop rapport before they trust a First Responder with their experiences and future. Methods such as keeping consistency with the designated officer in charge of the case can help build trust as a victim does not have to continually provide information to a number of different people. However, this should be carefully balanced with accessibility as police shift patterns can lead to long gaps in communication flow from victim to police.

Multi-agency working should be embedded within the MPS' processes and clear referral pathways drawn up and agreed. Not only will this help build trust for victims and survivors but also help increase the confidence partners have in each other. In many cases, primary needs need to be addressed before a victim feels able to make a decision about their future. A vital component of this is suitable emergency accommodation, which in London is in short supply. Whilst there are charitable organisations providing safehouse accommodation for women, there are a lack of services for transgender, non-binary and male victims; the latter of which currently make up the majority of reported cases. The LWG recommends that MOPAC consider funding the equivalent to the Safe Space project in the West Midlands, a safehouse

which addresses victims' immediate needs and allows time for discussing all their options before they decide whether to enter the NRM.

Case Example:

Paul met a woman through a dating app. On their first date, she invited him to stay at her flat. He accepted but as soon as he got there he was trapped by two men. He was assaulted, forced to take drugs and was sexually abused. He was kept in a bedroom where he was forced to have sex with other men who came to the property. "Men came and went all day long". One night there was just one of the men at the house so Paul escaped. He slept rough until he gathered the courage to go to the police station.

The police opened a case but Paul felt that he was not being believed. The police did not refer him to the NRM. Paul was supported by a homelessness charity and by the local authority who referred him to the NRM. Paul had a severe breakdown while waiting for the Reasonable Grounds Decision. He tried to commit suicide several times and did not attend his appointments with the police as he didn't think they believed him. As a result, the police closed his case. Paul received positive Reasonable Grounds Decision and is now receiving support under the Modern Slavery Victim Care Contract.

Information sharing

For partners to have trust and confidence in the police, we need to see a consistent approach across all BCUs. The LWG works closely with the Central Specialist Crime Team and supports the training they are rolling out to officers in the BCUs. The LWG has also worked with them to try and improve information sharing between NGOs and the MPS. This is a continued process and the LWG has raised that this requires a two-way dialogue and relies on trust and confidence in the police's response. To improve this, once an NGO has provided information about a case of modern slavery, they would find it helpful for non-sensitive information to be shared back with them so they are aware of what is happening with the information they have fed into officers and can update the victim if necessary.

Two-way information sharing also leads to a clearer picture of modern slavery in the capital. We welcome that the Central Specialist Crime Team is now sharing anonymised modern slavery data with the London Modern Slavery Leads council network to help inform local authority response. This has been revolutionary for demonstrating to councils that the crime is happening within their borough. In return, we hope partners can help the police by putting context to the trends being identified in the data.

BETTER SUPPORTING VICTIMS

First Responder Training

The police and local authorities, among other specific agencies, are First Responders and have a duty to make a referral to the NRM when they encounter suspected victims of modern slavery, (anonymously when an adult does not consent). In the pledge, signed by the Mayor of London during his re-election campaign, he agreed to *Promote the need for well-trained first responders across London*. The LWG would like to see this commitment laid out in the PCP. Ensuring officers understand modern slavery and the control methods used, as well as truly understanding the NRM process and best practice for making a referral, will lead to better supporting victims and a higher prosecution rate. Specific training should be provided regarding the statutory duties to protect and support children as well as ensuring agency specific obligations to multi-agency working.

Members of the LWG would be able to support with delivering this training and multi-agency attendance at training is helpful for strengthening partnership working and awareness of the roles of different organisations.

Criminal Justice Process

Based on MPS data, correct as of November 2021, between December 2019 – November 2020, there were 2,539 modern slavery offences recorded by the MPS. Half of the offences were marked as Investigation Complete: No Suspect Identified. Only 95 (less than 4%) resulted in a charge. The lack of prosecutions for modern slavery is common across all police forces and requires a change in approach.

The LWG welcomes the support of pre-recorded evidence and would like to see this used for all modern slavery offences, protecting victims from having to see their exploiter face to face or being cross-examined when they are not the person on trial. Protecting the mental health and well-being of victims and ensuring they are supported throughout the criminal justice process is paramount to successful prosecutions.

NGOs can support the police with this work. Victim Navigators and similar advocate roles bridge the gap between victims and law enforcement, explaining processes and jargon and accompanying victims to appointments and to court. Justice and Care found 89% of victims supported by their navigators engaged with the police^{viii}. Hope for Justice has similar data; between 2013-2021, 73% of victims supported by their Independent Modern Slavery Advocates (IMSA) engaged with reporting and criminal investigation. Since 2013, 100% of victims supported by an IMSA attended court when requested to do so and all but two cases (one of which was discontinued on a point of law) led to successful prosecution when the IMSA was supporting the victim with this process^{ix}. This data demonstrates how vital victim support is in modern slavery

prosecutions and without this support means less traffickers behind bars. More funding for IMSAs could turn around the low prosecution rate across London.

The LWG would like to support the Victims' Commissioner with her work 'to better understand victims' experience of the police response to modern slavery and identify how it can be improved' and we would encourage consultation with survivors of modern slavery as well as their parents/carers in cases that involve children or those with high needs, to inform this project.

Disruption Tactics

Identifying modern slavery suspects who are senior within organised crime gangs is acknowledged as a challenge. There are civil orders such as Slavery and Trafficking Prevention and Risk Orders which are currently under used which can disrupt exploitation. The LWG would welcome research on the efficacy of risk orders to see how effective they are and whether police have the capacity to follow up on breaches. Beyond the legal disposals available, law enforcement must ensure they adopt contextual safeguarding approaches, working together with other safeguarding partners, to disrupt and prevent exploitation.

An increase in modern slavery charges could change the narrative of exploitation, deter offenders and increase the confidence of victims that their traffickers will be convicted if they press charges. Some police forces have found that drug dealing, driving offences and other charges serve as a productive disruption tactic for traffickers and ensure a swift conviction, whilst also pursuing modern slavery offenses.

The MPS now has more of a focus on countering Organised Immigration Crime in relation to modern slavery offences. As well as people becoming trapped in debt bondage or being deceived as to the nature of their journey, those arriving in the UK illegally are drawn into exploitative practises due to being isolated from support and their inability to take on legitimate work. More robust targeting of the illicit criminal finances that underpin modern slavery is likely to have a significant disruption effect. Working together, law enforcement and private industry partners can identify a more effective proactive approach to using financial intelligence within modern slavery.

Trauma-informed Approach

Not all victims are able or willing to engage with an investigation and for them justice may have other meanings, such as compensation, long-term support or leave to remain. A trauma-informed approach helps victims to identify their options and make decisions which are best for them and we welcome the commitment under 'Reducing the Number of Young People and Adults being Exploited or Harmed' for City Hall to 'work with partners to embed a trauma-informed approach to victims of crime and all groups at higher risk of exploitation and harm.' However, more details are required to understand what this entails and how it will be monitored/reviewed.

It is vital to consider that victims of modern slavery may have suffered multiple forms of exploitation and abuse and the MPS and partners should avoid an approach that focuses solely on the 'presenting' exploitation. For example, a survivor of domestic servitude may have also experienced sexual abuse or sexual exploitation during their ordeal but may not have yet disclosed this additional information.

As mentioned under Building Trust and Increasing Confidence, the use of language is of utmost importance. This involves using language that the victim understands, whether this is avoiding acronyms and technical jargon or ensuring a professional DBS checked interpreter is present for every verbal communication and there are clear translations for all written communication and alternative provision if the individual cannot read. Use of nonverbal communication methods should also be utilised where appropriate to ensure messaging has been understood and improve the chances of the information shared being retained.

The LWG welcomes the commitment under the PCP for MOPAC to 'continue to work with partners... to embed and extend support for child victims of sexual abuse and exploitation' although again it would be useful to have more detail to understand what this entails. The LWG welcomes the service extension of 'The Lighthouse' to March 2022^x and would request a commitment to fund this ground-breaking and critical service further, as well as consideration to pilot its expansion to cover further geographical areas in London. The issue of transitional safeguarding and often a 'cliff-edge' of support for young people when they turn eighteen also needs to be addressed through multi-agency partnerships and joined up working so that systems are in place to ensure young people are treated in light of their vulnerability rather than their age.

Embedding support is also vital for adult victims of exploitation as well as children and young people. There are good practice examples of Multi-Agency Case Conferences in London which use a MARAC style approach to responding to cases of modern slavery. This multi-agency working and adoption of formal processes means that agencies are more prepared when cases arise and are not reliant on individual professionals to lead a response. They can also bring in expert organisations if the victim has specific cultural or learning needs. Funding for this type of approach may increase the likelihood of cooperation and convictions, as would funding more partnership working across the capital.

PROTECTING PEOPLE FROM EXPLOITATION AND HARM

The LWG welcomes 'Protecting People from Exploitation and Harm' as a key priority for the PCP and would like to begin by seeing policing within communities so that people can interact with officers as individuals and not as criminals or victims. The LWG would also encourage the Mayor to engage in meaningful consultation with victims and survivors of modern slavery to be informed by their lived experience.

Know your rights

Exploitation is a continuum, with modern slavery at the far end. To protect people from exploitation, we need to look to the other end and workers' rights. Ensuring people know their rights and entitlements is one step closer to them being in a position to exercise them and thus helping to protect them from exploitation.

Key to protecting people from exploitation and harm is raising awareness about these rights, what this means in practice and where to access support if they're not being met. This could also involve education in schools about criminal and sexual exploitation so that children are aware of the dangers and know how to report if they have concerns.

Addressing root causes

Prevention involves addressing the root causes of exploitation, and in many scenarios, it stems from poverty. For example, Government cuts to early help and youth centres have left more children vulnerable to exploitation and MOPAC could address these gaps with infrastructure and funding. Increasing funding for mental health support would also help protect people from exploitation and harm and access support following exploitation.

Some members of the LWG felt that the Mayor cannot protect people from exploitation and harm without addressing the demand for the exploited services. Examples of this were addressing the demand for drugs or sexual services, although not all members of the LWG are in agreement with the latter.

One key area the Mayor could lend support to is speaking out for the protection and restoration of the terms of the original Overseas Domestic Worker visa. Introduced in 2012, the original ODW visa provided this group of workers with certain fundamental rights in the UK, including the right to change employer and renew their visa so long as they had an employer willing to hire them. Crucially this allowed workers to challenge abusive working conditions and take steps to leave should conditions not improve. LWG member Kalayaan has produced evidence over the past 10 years which has consistently demonstrated that reported rates of abuse are significantly lower for workers on the original ODW visa than those who have entered the UK under subsequent visa regimes. Currently, conditions for workers need to deteriorate to the point of modern slavery for workers to be able to access protection via the NRM, whereas we need to protect workers before modern slavery occurs. Additionally, Kalayaan reports that when workers had rights to challenge abuse, more workers reported their employers to the authorities which sent a strong message the UK does not tolerate abuse and can lead to increased prosecutions.

Missing Children

The LWG welcomes the contextual safeguarding approach being taken to child exploitation in the PCP. The single Child Exploitation London Protocol is mentioned as a future action in the PCP, but appears to have already been published as The London Child Exploitation Operating Protocol 2021^{xi}. The LWG would like to understand what monitoring is in place to measure the impact of this document.

Missing episodes for children are an indicator of exploitation and harm which needs to be addressed. Missing episodes are being dismissed as 'normal' for certain children; a recent Human Trafficking Foundation report found that pre-conceived ideas on an individual child's behaviour, constructed through unhelpful stereotypes leave them without support in critical hours and opportunities to identify potential exploitation are missed. Young people who go missing with a pending criminal matter are frequently referred to as an absconder rather than a vulnerable missing person, despite the fact it is highly likely that someone who is being criminally exploited has pending criminal matters.

Return Home Interviews must be offered consistently to children and vulnerable adults after every missing episode and where there are concerns of exploitation. Research has shown independent services may be more appropriate to commission these services rather than statutory agencies.^{xii} Law enforcement must have capacity to carry out good quality prevention interviews even in cases of multiple missing episodes. Children identified as modern slavery victims, potential victims or at risk of exploitation should always be considered as 'high risk' in the context of the missing investigation and the first few hours considered critical.

Communication is vital in circumstances where a child is missing and this can be strengthened through communication both across BCUs and with neighbouring forces, such as requesting input into s.47 meetings, communication with British Transport Police and risk assessing new placement areas of children and young people.

Online Abuse

The LWG welcomes the recognition that it is vital that 'the MPS and all services are now focused on online crime and online harm as business as usual.' We know that a significant amount of recruitment for exploitation happens online, whether this is personal interaction through social media or exploitative job offers posing as legitimate adverts. The MPS and agencies should build conversations about online risks and exploitation into their investigative/assessment processes.

MONITORING AND EVALUATING

Measuring the impact of the PCP is vital. The LWG recommends greater use of qualitative data to measure outcomes rather than relying solely on traditional quantitative datasets and statistics to measure success. As part of partnership working, data can be collected from across a variety of organisations to get a fuller picture of the scale of the issue, change in trends and what is working.

We would also suggest reviewing other contextual approaches and exploring what is already working both in London and nationally to expand good practice. When measuring to see if responses have improved, we would recommend consulting with marginalised communities and victims with recent experience of police engagement who will be able to provide real examples of progress and challenges.

KEY RECOMMENDATIONS

1. Implement a safe reporting system for victims to report crimes without being referred to the Home Office, unless they request this
2. Amend the word 'violence' to 'abuse' in the priority 'Reducing and Preventing Violence'
3. Incorporate the learnings from the Public Health Approach to Modern Slavery report into the public health approach to tackling abuse
4. Produce an independent review of the Rescue and Response programme and clarify the mayor's response to criminal exploitation once the project ends
5. Amend the following sentence to ensure tackling exploitation remains at the centre of the response to county lines: 'MOPAC and the VRU will intensify focus on understanding and addressing the relationship between drugs, violence and exploitation in London'
6. Include criminal exploitation as a key component within the brief of the London Drugs Commission
7. Include the sexual exploitation of boys and young males in criminal exploitation in the 'gender responsive approach'
8. Include information about workers' rights and identifying unscrupulous job offers in 'The Mayor's Helping Londoners into Good Work mission'
9. Address and shift the policing culture in training and protocol to start from a position of believing a person is a victim
10. Consult with marginalised communities, victims and relevant professionals on proposed protocols for trauma-informed police interaction and what this will look like

11. Ensure children from migrant backgrounds do not face discrimination in policing responses and involvement in multi-agency mechanisms
12. Include the importance of the use of language as a central role in training and police guidance in order to change the narrative for victims
13. Fund Multi-agency partnership work which can be imbedded within the MPS processes
14. Fund safe house accommodation for victims of modern slavery in London to ensure there is appropriate pre- NRM housing and support for female, male, trans and non-binary victims
15. Continue funding 'The Lighthouse' and consider piloting further geographical cover
16. Develop a system for providing updates to NGOs that have shared information about a case to encourage future information sharing
17. Include a commitment for First Responder training in the police and crime plan
18. Fund advocate or navigator roles to support victims through the criminal justice system
19. Research the efficacy of modern slavery and human trafficking risk orders to see how effective they are and whether police have the capacity to follow up on breaches
20. Fund gaps in mental health and youth centres to address some of the root causes of child exploitation
21. Offer prevention interviews to children after every missing episode
22. List children as 'high risk' missing where there are concerns of exploitation
23. Use qualitative data to measure outcomes
24. Review existing approaches to protecting people from exploitation to replicate good practice
25. Consult marginalised communities and victims with recent experience of police engagement to help measure improvement and understand their views on what works
26. Pledge support for migrant domestic workers by making a public commitment for the full restoration of the terms of the original Overseas Domestic Workers visa

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- ⁱ London Working Group submission for PCP 2017, <https://bit.ly/3rzek5k>
- ⁱⁱ London Mayoral Candidates Modern Slavery Pledge, 2021 www.humantraffickingfoundation.org/news/2021/3/22/london-mayoral-candidates-pledge-to-prioritise-modern-slavery
- ⁱⁱⁱ Safe to Share? Super Complaint, 2020 <https://bit.ly/3loDbQI>
- ^{iv} Modern Slavery Act, 2015 <https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>
- ^v NRM Statistics <https://www.gov.uk/government/collections/national-referral-mechanism-statistics>
- ^{vi} Independent Anti-Slavery Commissioner Public Health Approach, 2021 <http://www.antislaverycommissioner.co.uk/news-insights/new-research-on-refining-a-public-health-approach-to-modern-slavery/>
- ^{vii} Opportunity Knocks, 2020 <https://www.labourexploitation.org/publications/opportunity-knocks-improving-responses-labour-exploitation-secure-reporting>
- ^{viii} Victim Navigator Interim Evaluation, 2021 <https://justiceandcare.org/wp-content/uploads/2021/09/Victim-Navigator-Interim-Evaluation-July-2021.pdf>
- ^{ix} The Fight Against Modern Slavery and Human Trafficking, 2017 <https://www.antislaverycommissioner.co.uk/media/1268/the-fight-against-modern-slavery-and-human-trafficking.pdf>
- ^x The Lighthouse <https://learning.nspcc.org.uk/services-children-families/the-lighthouse>
- ^{xi} MPS Child Exploitation Operating Protocol, 2021 <https://cscp.org.uk/wp-content/uploads/2021/03/The-London-Child-Exploitation-Operating-Protocol-2021-MPS.pdf>
- ^{xii} Return Home Interviews, 2019 <https://tce.researchinpractice.org.uk/wp-content/uploads/2020/02/The-First-Step-How-return-home-interviews-can-improve-support-and-safeguarding-for-missing-young-people.pdf>