



Modern slavery in the UK: the role and impact of multi-agency collaboration

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Modern slavery in the UK: the role and impact of multi-agency collaboration

Ben Brewster

A thesis submitted in partial fulfilment of the requirements of
Sheffield Hallam University
for the degree of Doctor of Philosophy

October 2019

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ABSTRACT

This thesis presents findings from research into the role and impact of five place-based multi-agency anti-slavery partnerships in the UK. The research uses a single case-study approach with multiple embedded units of analysis. It draws upon data from five geographic regions of the UK as the basis of a comparative analysis that involves the full spectrum of statutory and non-statutory organisations that undertake anti-slavery work. The thesis focuses, in particular, on the role of partnerships in victim identification and support, while simultaneously discussing issues and drawing upon existing discourse associated with policy, legislation and the macro conditions that impose barriers on such efforts. The research finds a developing landscape of anti-slavery partnership work, progressed, primarily, by statutory organisations such as the police and local government in each of the five regions. It identifies that within those regions, a range of activities are being undertaken that aim to support law enforcement, improve detection rates of victims, and work around limitations in national victim support provisions by raising awareness, providing training to public-facing staff and implementing local processes and practice. Overall, it concludes that although there is much to applaud in the range and scope of activity being undertaken by local partnerships, more work is needed across the board to evaluate their impact moving forward.

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GLOSSARY

ACRONYMS AND ABBREVIATIONS

CPS	Crown Prosecution Service
FBO	Faith Based Organisation
GLAA	Gangmasters and Labour Abuse Authority
HMICFRS	Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services
HMRC	Her Majesty's Revenue and Customs
IASC	Independent Anti-Slavery Commissioner
LA	Local Authority
LGA	Local Government Association
MARAC	Multi-Agency Risk Assessment Conference
MASH	Multi-Agency Safeguarding Hub
MSHT	Modern Slavery Human Trafficking
MSA	Modern Slavery Act
MS	Modern Slavery
NAO	National Audit Office
NCA	National Crime Agency
NGO	Non-Governmental Organisation
NRM	National Referral Mechanism
OPCC / PCC	Office of the Police and Crime Commissioner / Police and Crime Commissioner
POLKA	Police Online Knowledge Area
SERAC	Slavery and Exploitation Risk Assessment Conference (also sometimes used to refer to Sexual Exploitation Risk Assessment Conference)
SPOC	Single Point of Contact
UK	United Kingdom
UKVI	United Kingdom Visas and Immigration
UN	United Nations

CASE STUDY REGIONS

The primary study refers to five geographic units of analysis. Each region is pseudonymised and summarised below. A full explanation of their selection and the project's overarching methodology can be found in Chapter 5.

Region 1
(Large Metropolitan)

Region 1 is a large geographic region consisting of multiple metropolitan boroughs, with a combined population of over 2 million. One of its boroughs is considered to be one of the largest and most densely populated cities in the country.

Region 2
(Devolved)

Region 2 is a devolved region of the UK. It has a population of around 2 million and covers the largest area of any region included in the study. It consists of both densely populated urban areas and low-density rural areas.

Region 3
(Rural North)

Region 3 is one of the largest non-devolved regions of the UK by geographic area. Region three is also considered to be one of the country's most affluent, with below average unemployment. As a largely rural area, it also boasts large agricultural and tourist industries.

Region 4
(Rural South)

Region 4 is a rural area in the south of the UK. It has a large agricultural industry and a population of around 1 million – similar to region 3, though as it is roughly 50% smaller than region 3, has a higher population density.

Region 5
(Coastal South)

Region 5 consists of two counties in the south of the UK with a combined population of over 1.5 million. Region 5 is coastal, with an economy reliant on the tourism and agricultural industries.

1 INTRODUCTION

“This is the great human rights issue of our time... I am determined that we will make it a national and international mission to rid our world of this barbaric evil.”¹

At the end of 2013, then Home Secretary Theresa May delivered the draft Modern Slavery Bill to parliament, declaring that the legislation would be the first of its kind in Europe. The Act would consolidate law enforcement powers around the issue of modern slavery and focus the UK’s national efforts to stop it at its source, helping to bring more perpetrators to justice, and in the process protect and support those who fall victim.² The Modern Slavery Act, which eventually came into force in 2015, simultaneously drove modern slavery to the top of the policing agenda and directed national public and media attention toward the issue.

Since then, modern slavery has been increasingly thrust into the public consciousness. Reports of labour exploitation in businesses such as nail-bars, car-washes and takeaway restaurants, sex exploitation in pop-up brothels and emerging forms of child exploitation in county-lines drug trafficking gangs have all become increasingly pervasive in both the national and local media.³ In response, the police and other statutory organisations have been forced to scale up their

¹ Theresa May, “My Government Will Lead the Way in Defeating Modern Slavery,” *The Sunday Telegraph*, June 30, 2016, <https://www.telegraph.co.uk/news/2016/07/30/we-will-lead-the-way-in-defeating-modern-slavery/>.

² Home Office, “Draft Modern Slavery Bill,” no. June (2013), https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/266165/Draft_Modern_Slavery_Bill.pdf.

³ Sarah Boseley, “App Sounds Alarm for Slavery at UK Hand Carwash Sites,” *The Guardian*, April 7, 2019, <https://www.theguardian.com/world/2019/apr/07/app-sounds-alarm-for-slavery-at-uk-hand-carwash-sites>; Annie Kelly, “From Nail Bars to Car Washes: How Big Is the UK’s Slavery Problem?,” *The Guardian*, October 18, 2018, <https://www.theguardian.com/global-development/2018/oct/18/nail-bars-car-washes-uk-slavery-problem-anti-slavery-day>; Vikram Dodd, “Children as Young as Seven ‘Being Enslaved by UK Drug Gangs,’” *The Guardian*, July 5, 2019.

efforts to prevent and investigate modern slavery, and to identify and support its victims.

Set against this backdrop, the following thesis documents the background, methodology and results of the first UK study to show in-depth *why* multi-agency partnership approaches are an important element of anti-slavery work, and how they impact upon anti-slavery work in practice. The project identifies that while partnerships are present in almost all areas of the UK, they are currently underrepresented in the national anti-slavery agenda and policy discourse, and their role undervalued. In response, the study utilises a case-study approach to its methodology, positioning multi-agency partnerships as a single case, with five regional place-based partnerships providing multiple units of analysis. The research culminates in the establishment of a conceptual framework that both encapsulates core elements of ongoing anti-slavery partnership work and provides a future framework for improving effective processes and practice.

1.1 WHAT IS MODERN SLAVERY?

“Modern slavery and human trafficking can range in scale and complexity from an individual forced to undertake domestic duties in a private household for little or no pay (domestic servitude) to much more substantial, sophisticated, criminal activity such as transporting hundreds of victims across national borders for the purpose of sexual or labour exploitation.”⁴

The issue at the centre of this study is modern slavery. But what is it? What threats and risks does it pose, and what harm does it cause to those affected by it? This introduction sets the scene for the wider study by introducing the global issues of modern slavery and human trafficking, moving from their historical roots in the transatlantic slave trade of the 16th century, through to modern forms of extreme exploitation in the present day.

⁴ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking,” 2017, www.justiceinspectorates.gov.uk/hmicfrs.

1.1.1 DEFINITIONS

In order to fully understand and appreciate the extent and impact of modern slavery, it is first necessary to consider what it is, how it manifests, and the scope and extent to which it impacts victims. This section will review the dominant discourse on modern slavery towards establishing a working definition that will be used throughout the rest of the study. While the primary research focuses on the UK, international perspectives will be included, providing an additional dimension to highlight the different ways slavery is viewed and framed, and facilitating discussions in subsequent sections on the scale, nature and impact of slavery around the world.

The word 'slavery' itself invokes images of the trans-Atlantic slave trade, and the trafficking of African slaves for exploitation on sugar and tobacco plantations in the Americas.⁵ While these practices ended, formally, in the nineteenth century and despite the fact that slavery has been abolished globally since, it remains ingrained within the supply chains that fuel the global economy. The production of the goods we consume and services we use are riddled with suffering and exploitation in much the same way as sugar and tobacco was between the 16th and 19th centuries.⁶ The trans-Atlantic slave trade, because of this comparison, is now commonly used as a historical touchstone, and a tool to conjure evocative imagery and stimulate the need for action by a new wave of 21st century abolitionists.⁷

But modern definitions do draw upon earlier work. For instance, the Harvard-Bellagio guidelines on the legal parameters of slavery, formed in 2012, are adapted from the 1926 Slavery convention definition. The 1926 convention states that 'slavery is the status or condition of a person over whom any or all of the powers

⁵ James A. Rawley and Stephen D. Behrendt, *The Transatlantic Slave Trade: A History* (University of Nebraska Press, 2005), <https://doi.org/10.1007/s13355-016-0430-7>.

⁶ Karen Bravo, "Trans-Atlantic Slavery and Contemporary Human Trafficking," *Open Democracy*, 2014, <https://www.opendemocracy.net/beyondslavery/karen-bravo/transatlantic-slavery-and-contemporary-human-trafficking>.

⁷ Bravo.

attaching to the right of ownership are exercised'.⁸ The revised guidelines define modern slavery as the possession and control of a person, in such a way as to deprive that person of his or her liberty, with the intent of exploiting that person through their use, management, profit, transfer or disposal. Usually this exercise will be achieved through means such as violence or threats of violence, deception and / or coercion.

By the Harvard Bellagio guidelines, and recent legislative developments in countries such as the UK and Australia, modern slavery is now used as an umbrella term to encapsulate the crimes of human trafficking, forced and extreme forms of exploitative labour, sexual exploitation, criminal exploitation and domestic servitude.

However, until fairly recently, the modern manifestation of slavery was almost exclusively referred to under the labels of 'Human Trafficking' or, in the case of the USA - 'Trafficking in Persons'. Perhaps the most pervasive and commonly used reference and definition today comes from the United Nations (UN) Palermo Protocol. The protocol, formally referred to as the UN Protocol to Prevent Suppress and Punish Trafficking in Persons, came into force in 2003 and states that 'Trafficking in persons' refers to:

"The recruitment, transportation, transfer, harbouring or receipt of persons, by means of threat or use of force or other forms of coercion, or abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purposes of exploitation." ⁹

The protocol establishes three prerequisite conditions for trafficking in persons; the act, the means, and the purpose. The 'act' refers to *what* is being done. This

⁸ Bellagio-Harvard Guidelines, "Bellagio-Harvard Guidelines on the Legal Parameters of Slavery," 2012, <http://www.law.qub.ac.uk/schools/SchoolofLaw/FileStore/Filetoupload,651854,en.pdf>.

⁹ United Nations, "United Nations Convention against Transnational Organized Crime and the Protocols Thereto," 2000, <http://www.osce.org/odihr/19223?download=true>.

may involve the recruitment, transfer or movement, harbouring, or receipt of an individual person. The 'Means' refers to *how* the act is being facilitated. This can be through the use of threats or force, coercion, abduction or the giving of payment or benefits to the individual(s). The final element, the 'purpose' is the means of exploitation that the 'act' and 'means' are being conducted in service of. This is most commonly done through forced labour or sexual exploitation (such as forced prostitution) but can include the removal of organs and other exploitative practices. Within the conditions of the protocol, instances where children are involved acts are still considered as trafficking even if there is no evidence of coercion, deception or any other of the 'means' previously identified.¹⁰ This definition remains applicable across all UN signatories, including the UK.

Recently however the legal terminology used around human trafficking in the UK, as a specific example, has changed. Since the initial draft of the Modern Slavery Bill in 2013, vocabulary across most disciplines has shifted to focus on 'modern slavery'. The final version of the bill, the Modern Slavery Act 2015 is discussed, along with its implications, in section 3.3. Australia has since implemented its own modern slavery bill, while it's been mooted that other nations may also follow suit.¹¹

At this point it is perhaps sensible to pose the question as to whether there is a fundamental conceptual difference between the ideas of (modern) slavery and human trafficking. While globally, trafficking is still perhaps the more pervasive term, the definitional landscape is somewhat clouded, and the terms are often used interchangeably.¹² Free the Slaves, a leading global advocacy organisation, states that in a practical sense, "trafficking is when someone is moved from one

¹⁰ United Nations.

¹¹ The Parliament of the Commonwealth of Australia, "Modern Slavery Bill 2018" 2018 (2018), https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bId=r6148; Carole Gilbert and Benedict Wray, "Modern Slavery Legislation – Canada May Follow the Global Trend," Norton Rose Fullbright, 2018, <https://www.nortonrosefulbright.com/en/knowledge/publications/ee653db4/modern-slavery-legislation---canada-may-follow-the-global-trend>.

¹² Janie Chuang, "Exploitation Creep and the Unmaking of Human Trafficking Law," *American Journal of International Law* 106, no. 4 (2014): 609–49.

place to another for the purpose of enslavement. While slavery “is the exploitation that happens when they arrive.”¹³ However, in many jurisdictions the legal definition of trafficking means or at least infers slavery, as movement is often not a prerequisite for anti-trafficking laws to be applicable. Statistically speaking, figures suggest that only around 20% of people who are enslaved are exploited outside their home countries, while the remaining 80% fall victim to some form of domestic ‘trafficking’.¹⁴

In the US, the physical movement of individuals is also de-emphasised in the legal terminology. The definition instead focuses on “the act of compelling or coercing persons for labour, services, or commercial sex acts.”¹⁵ This is also reinforced by the US Department of Justice (USDOJ) who reiterate that human trafficking crimes do not require any “smuggling or movement of the victim” in order to be considered as such. This is also a common narrative in the UK, where human trafficking has been described as: “the movement of a person from one place to another into conditions of exploitation, using deception, coercion, the abuse of power or the abuse of someone’s vulnerability.”¹⁶ It is possible to be a victim of trafficking even if you give consent to be moved. Although trafficking often involves an international cross-border element, it is also possible to be a victim of domestic human trafficking within your own country.

Given the core context of this study, and its focus primarily on the UK – the definitions contained within the Modern Slavery Act 2015 are perhaps the most applicable. The Act itself, while acting as an umbrella to consolidate these separate offences, differentiates human trafficking from the offences of slavery, servitude and forced labour. While on the one hand the human trafficking offence mirrors the concepts provided by the Palermo protocol, the offence of ‘slavery, servitude and

¹³ Free the Slaves (n.d.)

¹⁴ Free the Slaves.

¹⁵ United States Department of Justice, “INVOLUNTARY SERVITUDE, FORCED LABOR, AND SEX TRAFFICKING STATUTES ENFORCED” (2000), <https://www.justice.gov/crt/involuntary-servitude-forced-labor-and-sex-trafficking-statutes-enforced>.

¹⁶ Sally Lipscombe and Jacqueline Beard, “Human Trafficking: UK Responses,” *House of Commons Library*, 2014, 3, <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN04324#fullreport>.

forced labour’ requires only the ‘means’ (i.e. use for force, threat or coercion etc. and service elements (i.e. labour, domestic service, sexual service, begging etc.). However, in the case of children it is only necessary to prove the service aspect.¹⁷

The diverse nature of exploitation means that it frequently takes multiple forms. Victims are often manipulated, controlled and coerced in a number of different ways, and it can be hard to distinguish and draw a clear distinction between the offences of trafficking and slavery when observing real cases.¹⁸ As a result, the term ‘modern slavery’ will be used to encompass everything that falls within the remit of human trafficking, slavery, servitude and forced labour throughout this study, mirroring current discourse in the UK. As the project focuses on the UK specifically, it will also broadly follow the definition contained within the Modern Slavery Act 2015, the specific provisions of which are presented and discussed in chapter 3.

1.1.2 THE NATURE OF EXPLOITATION

Estimations suggest that modern slavery is a growing and increasingly prominent international problem, with figures indicating that it is the second largest and fastest growing criminal enterprise worldwide with the exception of narcotics trafficking.¹⁹ The ways in which individuals are exploited as victims of modern slavery are broad, and they adapt to continually evolving demands for labour and services, fuelled by changes in the economic, political and social environment. Victim demographics are also diverse, similarly impacted by change based on shifts in the global economic and political landscapes, and traffickers and

¹⁷ Legislation.gov.uk, “The Modern Slavery Act 2015,” 2015, <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>.

¹⁸ Kate Roberts et al., “The Slavery and Trafficking Survivor Care Standards,” *Human Trafficking Foundation*, 2018, <https://static1.squarespace.com/static/599abfb4e6f2e19ff048494f/t/5bcf492f104c7ba53609aeb0/1540311355442/HTF+Care+Standards+%5BSpreads%5D+2.pdf>.

¹⁹ Jennifer S. Nam, “The Case of the Missing Case: Examining the Civil Right of Action for Human Trafficking Victims,” *Columbia Law Review* 107, no. 7 (2007): 1655–1703.

exploiters prey on the socio-economic precarity of the individuals and groups made vulnerable by these shifts.²⁰ The broad nature of the problem contributes to its status as a largely clandestine and unknown issue, typified by some referring to the true number of modern slaves globally as the ‘dark number’.²¹

The ways in which people are exploited can range from that of a sexual nature, through forced prostitution, to a wide range of forced and exploitative labour practices, forced criminality and more obscure practices such as human organ harvesting. Common practices in the UK include the exploitation of victims in forced labour across the agricultural, fishing, construction and service industries where they are not only forced to work on farms, in car washes or nail-bars, but also to commit welfare fraud and even forced into illicit businesses cultivating cannabis.²² But the specifics of these forms of exploitation vary geographically, changing in line with the presence of local industry, and demand for specific forms of labour.

At the core of modern slavery is the existence of exploitative relationships between two or more people, involving three constituent elements. These elements are: the facilitation of economic exploitation, the abuse of an individual’s human rights, and the use of violence, in either prospect or reality, to maintain control over a person.²³ This includes when individuals are “forced to work”, through coercion or threat, “owned or controlled by an employer”, using mental or physical abuse (or the threat of), bought and sold as property, or “physically constrained”, or with restrictions placed on their movement.²⁴

²⁰ Kevin Bales, Laurel E. Fletcher, and Eric Stover, “Hidden Slaves: Forced Labor in the United States,” *Berkeley Journal of International Law* 23 (2004): 47–111; Kevin Bales and Ron Soodalter, *The Slave Next Door* (Berkeley: University of California Press, 2009).

²¹ Maarten Cruyff, Jan van Dijk, and Peter G. M. van der Heijden, “The Challenge of Counting Victims of Human Trafficking: Not on the Record: A Multiple Systems Estimation of the Numbers of Human Trafficking Victims in the Netherlands in 2010–2015 by Year, Age, Gender, and Type of Exploitation,” *Chance* 30, no. 3 (2017): 41–49, <https://doi.org/10.1080/09332480.2017.1383113>.

²² Gary Craig et al., “Contemporary Slavery in the UK,” *Joseph Rowntree Foundation* (York, 2007), <https://www.jrf.org.uk/sites/default/files/jrf/migrated/files/2016-contemporary-slavery-uk.pdf>.

²³ Craig et al.

²⁴ Anti-Slavery International, “What Is Modern Slavery?,” accessed January 18, 2018, <https://www.antislavery.org/slavery-today/modern-slavery/>.

The nature of exploitation is also gendered. While women are more commonly found to be victims of sexual exploitation and men labour exploitation, on the whole, slavery disproportionately affects women. Figures from the International Labour Organisation (ILO) suggest that 71% of the 40.3 million people it estimates are currently living in conditions of slavery, are women - a staggering 28.6 million in total.²⁵ The sectors where exploitation occurs are also stratified based on gender. Men for instance often fall victim in areas such as agriculture, manufacturing and construction, whereas women are more likely to be exploited through domestic servitude, the service industry and sex-work.²⁶ This reflects the embedded societal hierarchy which has historically, and in many cases continues to, oversee the structural discrimination of women by men.²⁷

But slavery's connection to the socio-economic, political and social environment does not stop with shaping the types of exploitation victims face. In reality, slavery forms part of a broader system of oppression that facilitates the commoditisation and exploitation of the environment, animals and, of course, people, as part of the hierarchies humans impose upon one another and the natural world around them.²⁸ For example, fieldwork conducted by Kevin Bales has established clear linkages between ecocide: the deliberate and systematic destruction of the environment, and slave-driven trade.²⁹ In places like Brazil and the Bay of Bengal, illegal deforestation is, more often than not, facilitated using slave and bonded labour. These newly cleared areas are used in service of agriculture, creating shrimp farms and cattle pastures, and illegal mining for earth minerals like Coltan

²⁵ International Labour Organization, "Global Estimates of Modern Slavery: Forced Labour and Forced Marriage," *Alliance* 8.7, 2017, https://www.ilo.org/wcmsp5/groups/public/---dgreports/--dcomm/documents/publication/wcms_575479.pdf.

²⁶ Katharine Bryant, "Global Estimates of Modern Slavery: We Need to Talk about Gender," Plan International UK, 2017, <https://plan-uk.org/blogs/global-estimates-of-modern-slavery-we-need-to-talk-about-gender>.

²⁷ Nick Grono, "Women and Girls Should Be at Heart of Efforts to Tackle Modern Slavery," *CNN*, 2018, <https://edition.cnn.com/2018/01/17/opinions/grono-women-and-girls-slavery/index.html>.

²⁸ Murray Bookchin, *The Ecology of Freedom: The Emergence and Dissolution of Hierarchy* (Cheshire Books, 1982).

²⁹ Kevin Bales, *Blood and Earth: Modern Slavery, Ecocide, and the Secret to Saving the World* (Spiegel & Grau, 2015).

– a precious metal used in the production of electronics. This environmental destruction has direct implications on the natural world. It significantly reduces mangrove forests and other trees that house insects, animals and birds, whilst also playing a vital role in scrubbing carbon dioxide from the air, replacing them with, often illicit, industries, themselves extremely damaging to the environment, and fuelled by the continued enslavement of humans.³⁰

It really is hard to truly convey the true extent and diversity of ways through which people who are trafficked and enslaved are exploited. Around the world this exploitation ranges from that of a sexual nature to forced labour, including: organ removal, begging, forced marriage, benefit and welfare fraud, and drug cultivation and trafficking.³¹ These extreme forms of exploitation are known to be commonplace across diverse range of sectors including the food industry, agriculture, manual labour, fishing and construction.³² From the caste systems of Mauritania that see people socially stratified into domestic servitude from birth, and the bonded labour of India's brick kiln industry, the enslaved child prostitutes of Thailand, right through to the child criminal exploitation in the UK's 'country lines' drug trafficking gangs, modern slavery continues to proliferate and prosper in disparate ways around the globe.³³

Though the demand for slave labour varies depending on the social, political, economic and other conditions in a given location, it is often most easily

³⁰ Bales.

³¹ Anti-Slavery International, "What Is Modern Slavery?"

³² Bridget Anderson and Julia O'Connell Davidson, *Trafficking - a Demand Led Problem?, Save the Children*, 2002, [http://lastradainternational.org/Isidocs/11 Trafficking - a demand led problem.pdf](http://lastradainternational.org/Isidocs/11%20Trafficking%20-%20a%20demand%20led%20problem.pdf).

³³ Max Haller and Anja Eder, *Ethnic Stratification and Economic Inequality around the World: The End of Exploitation and Exclusion?*, 1st ed. (Routledge, 2015), <https://libgen.pw/item/adv/5a1f05683a044650f51050dc%0Ahttps://libgen.pw/download/book/5a1f05683a044650f51050dc>; Doreen S. Boyd et al., "Slavery from Space: Demonstrating the Role for Satellite Remote Sensing to Inform Evidence-Based Action Related to UN SDG Number 8," *ISPRS Journal of Photogrammetry and Remote Sensing* 142 (2018): 380–88, <https://doi.org/10.1016/j.isprsjprs.2018.02.012>; Orlando Patterson and Xiaolin Zhuo, "Modern Trafficking, Slavery, and Other Forms of Servitude," *Annual Review of Sociology* 44 (2018): 407–39, <https://doi.org/https://doi.org/10.1146/annurev-soc-073117-041147>; Childrens Society, "What Is County Lines?," 2018, <https://www.childrenssociety.org.uk/what-is-county-lines>.

demonstrated as a simple issue of supply and demand. In the developing world, this often manifests itself as ‘unskilled’ labour where low cost agricultural workers and miners are in high demand. As a result, hereditary chattel slavery, serfdom and debt bondage are commonplace, and victims are regularly forced to live under the direct threat of physical violence.³⁴ In more developed countries, while forced labour through agricultural and other blue-collar industries is still commonplace, victims are also often exploited in the service sector in businesses such as nail-bars, hand car-washes and takeaway restaurants.³⁵ Such businesses have also been uncovered as fronts for other forms of criminality, including money laundering, cannabis cultivation and the trafficking of other narcotics.³⁶ Sexual exploitation, particularly of women and girls, through forced commercial prostitution and rape is also globally pervasive. In places like Burma, Cambodia and Mexico it’s far from uncommon for young girls, to be kidnapped, recruited under false pretence or purchased from poverty stricken rural areas and forced to work in commercial sex house. Undercover journalists such as Siddharth Kara and Lydia Cacho have provided first-hand accounts of these practices revealing them to be nothing short of horrifying.³⁷

³⁴ Bales, *Blood and Earth: Modern Slavery, Ecocide, and the Secret to Saving the World*.

³⁵ National Crime Agency, “Types of Modern Slavery Crime,” n.d., <http://www.nationalcrimeagency.gov.uk/crime-threats/human-trafficking/types-of-human-trafficking>; The National Crime Agency, “NCA Strategic Assessment: The Nature and Scale of Human Trafficking in 2014,” 2014, <http://www.nationalcrimeagency.gov.uk/publications/656-nca-strategic-assessment-the-nature-and-scale-of-human-trafficking-in-2014/file>.

³⁶ David Gadd and Rose Broad, “Troubling Recognitions in British Responses to Modern Slavery,” *The British Journal of Criminology* 58, no. 6 (2018): 1440–61, <https://doi.org/10.1093/bjc/azx082>; Matt Hopkins and Nikki Shelton, “Identifying Money Laundering Risk in the United Kingdom: Observations from National Risk Assessments and a Proposed Alternative Methodology,” *European Journal on Criminal Policy and Research* 25, no. 1 (2018): 63–82, <https://doi.org/10.1007/s10610-018-9390-5>.

³⁷ Siddharth Kara, *Sex Trafficking: Inside the Business of Modern Slavery* (Columbia University Press, 2010), <https://doi.org/10.1353/hrq.2011.0034>; Lydia Cacho, *Slavery Inc.: The Untold Story of International Sex Trafficking* (Soft Skull Press, 2014).

1.2 WHAT CREATES DEMAND FOR SLAVES?

Kevin Bales has argued that the highest determinant of demand for enslaved individuals is the availability of substitutes.³⁸ When considering forced labour that is the absence of readily available forms of 'cheap', legal workers, resulting in an increased demand for slave labour – fuelled by the overarching demand for cheap products and services by end consumers. The relatively low cost of slave labour, in comparison to the legal alternative, means that 'consumers' of slave labour are relatively insensitive to variations in its cost. To facilitate the availability and use of slave labour, traffickers and slave-masters prey on the vulnerable. That is, those who exist in a state of socio-economic precarity.³⁹ People whose economic prospects are poor, are unemployed, and those without family or education are often considered some of the most vulnerable or at-risk. In Europe, this is perhaps most easily exemplified by the social and economic problems, in addition to the legislative vacuum, that emerged as a result of the fall of communism that began towards the end of the 1980s.⁴⁰ In that particular case, the resulting environment created a fertile landscape for exploiters, exhibiting many 'push factors', such as civil unrest, government corruption and conflict, and of course poverty.⁴¹ Many of the communities and individuals that originate from EU ascension states, despite having full legal status to work in places like the UK and other comparatively prosperous EU states, remain in positions of precarity, instability and uncertainty.⁴² The truth is, there is a huge disparity in wealth between the most economically prosperous countries and those which are not. This disparity

³⁸ Kevin Bales, *Disposable People: New Slavery in the Global Economy* (Berkeley: University of California Press, 2012).

³⁹ Hannah Lewis et al., *Precarious Lives: Forced Labour, Exploitation and Asylum* (Bristol: Bristol University Press, 2015), <https://policy.bristoluniversitypress.co.uk/precarious-lives-1>.

⁴⁰ Jeff Haynes, "Tracing Connections between Comparative Politics and Globalisation," *Third World Quarterly* 24, no. 6 (2003): 1029–47, <https://doi.org/10.1080/01436590310001630053>.

⁴¹ Kevin Bales, "What Predicts Human Trafficking?," *International Journal of Comparative and Applied Criminal Justice* 31, no. 2 (2011): 269–79, <https://doi.org/10.1080/01924036.2007.9678771>.

⁴² Lewis et al., *Precarious Lives: Forced Labour, Exploitation and Asylum*.

provides the allure of comparatively ‘well-paid’ yet insecure employment and leads many to take dubious migration opportunities that ultimately lead to exploitation.⁴³

The UK’s recent ‘Brexit’ vote to leave the EU has created new concerns in this regard. The vote threatens to effectively stem the flow of legal labour from within the EU, creating a vacuum that could be filled, in part, by those willing to illegally traffick workers from overseas, or force vulnerable existing UK residents into exploitative, and for some, slave labour. Such a scenario increases both demand and supply. It removes the ability of those from traditional ‘source’ countries like Romania and Bulgaria to seek legal employment in the UK, and simultaneously increases the demand for them in the UK itself.⁴⁴ The same research notes that the confusion caused around legal status as a result of triggering Article 50 has itself increased uncertainty.⁴⁵ Workers are now even less aware of their rights, while eventually, a proportion are likely to be classed as criminals just by virtue of being in the UK illegally. This potentially reinforces existing issues with victims being wrongfully prosecuted under immigration offences despite claiming to be victims of modern slavery; an issue which will be covered in more detail here in later chapters.⁴⁶ Similar trends have also been noted elsewhere. For example, Danailova-Trainor and Belser observed that the rate at which women are trafficked for the purposes of prostitution is influenced by the rates of female youth unemployment in their home countries.⁴⁷ This indicates how a lack of

⁴³ Seo-Young Cho, “Modelling for Determinants of Human Trafficking,” *Social Inclusion (Special Issue “Perspectives on Human Trafficking and Modern Forms of Slavery”)*, no. 3 (2012): 2–21, <https://doi.org/10.2139/ssrn.2117838>.

⁴⁴ Genevieve LeBaron and Laya Behbahani Jean Allain, Andrew Crane, “Forced Labour’s Business Models and Supply Chains,” *Joseph Rowntree Foundation*, 2013, <https://www.jrf.org.uk/report/forced-labour’s-business-models-and-supply-chains>.

⁴⁵ Article 50 is a clause of the Treaty on European Union that is invoked when a member wishes to withdraw. Article 50 was invoked by the United Kingdom following the results of the ‘Brexit’ referendum in 2017.

⁴⁶ Amelia Gentleman, “Trafficking Victims ‘Being Wrongly Sent to Immigration Detention Centres,’” *The Guardian*, 2017, <https://www.theguardian.com/world/2017/nov/15/trafficking-victims-being-wrongly-sent-to-immigration-detention-centres>.

⁴⁷ Gargana Danailova-Trainor and Patrick Belser, “Globalization and the Illicit Market for Human Trafficking: An Empirical Analysis of Supply and Demand,” *International Labour Organisation*, 2006, http://www.childtrafficking.com/Docs/globalization_0870.pdf.

genuine employment opportunities can also be a clear facilitating factor of enslavement and exploitation.

While demand provides a simple explanation as to why modern forms of slavery continue to thrive, the factors that continue to drive this demand are too complex and nuanced to simply derive direct causal linkage between one specific factor and the outcome: slavery. A limited amount of work has tried to unpick these ‘determinants’ of slavery. For instance, significant correlation has been made between historical racial inequality, contemporary forms of slavery, and ethnic fragmentation, while others have signposted restrictive immigration law and the pervasion of neoliberal labour market deregulation as significant drivers.⁴⁸ In other cases, factors such as legalised prostitution appear to have more complex impacts, managing to potentially increase and reduce demand. Legalisation, it has been observed, simultaneously reduces demand for trafficked women due to the presence of a legal alternative, whilst also increasing the overall market for prostitution, meaning that demand for forced sex-workers can increase, but potentially representing a lower proportion in total.⁴⁹ Overall, the clandestine nature of trafficking makes it hard to establish a clear relationship between these phenomena, and further research is needed to truly understand the precise significance of these determinants.

Like any business, the behaviour of traffickers *can* be rationalised using simple economics. Trafficking and slavery present high-profit opportunities, paired with

⁴⁸ Rodrigo R. Soares, Juliano J. Assunção, and Tomás F. Goulart, “A Note on Slavery and the Roots of Inequality,” *Journal of Comparative Economics* 40, no. 4 (2012): 565–80, <https://doi.org/10.1016/j.jce.2012.02.001>; Graziella Bertocchi, “Slavery, Racial Inequality, and Education,” *IZA World of Labor* 122 (2015), <https://doi.org/10.15185>; Randall K. Q. Akee et al., “Ethnic Fragmentation, Conflict, Displaced Persons and Human Trafficking: An Empirical Analysis,” in *Migration and Culture, Frontiers of Economics and Globalization*, ed. Gil S. Epstein and Ira N. Gang, vol. 8 (Emerald, 2010), <https://www.iza.org/publications/dp/5142/ethnic-fragmentation-conflict-displaced-persons-and-human-trafficking-an-empirical-analysis>; Hannah Lewis and Louise Waite, “Asylum, Immigration Restrictions and Exploitation: Hyper-Precarity as a Lens for Understanding and Tackling Forced Labour,” *Anti-Trafficking Review*, no. 5 (2015): 49–67, <https://doi.org/10.14197/atr.20121554>.

⁴⁹ Seo Young Cho, Axel Dreher, and Eric Neumayer, “Does Legalized Prostitution Increase Human Trafficking?,” *World Development* 41, no. 1 (2013): 67–82, <https://doi.org/10.1016/j.worlddev.2012.05.023>.

relatively low comparative risk.⁵⁰ Punishment for trafficking and slavery across many countries continues to involve only short prison sentences and little to no economic punishment.⁵¹ This is particularly true of countries outside the EU, and means that sexual and labour exploitation are potentially very lucrative pursuits. Estimates suggest that traffickers can turn over three to 500 times their original investment on each victim. In some countries it is not uncommon for a small two dollar investment in a child to turn into \$10,000 if that child is subsequently sold on to a brothel.⁵² While commodities like narcotics can be sold only once, a person being exploited in conditions of slavery can be sold over and over again for huge profit.

1.3 MODERN SLAVERY IN THE UNITED KINGDOM

Like every other country on earth, the UK has a modern slavery problem, and human trafficking, and now modern slavery have, in recent years, been pushed up the UK's national policing agenda.⁵³ This perhaps, is most prominently evidenced through the introduction of the Modern Slavery Act in 2015; itself acting as a key focussing event for the upscaling of national anti-slavery efforts. In terms of the numbers of individuals affected, the Home Office suggest there are around 13,000 victims of modern slavery currently living in the UK.⁵⁴ In terms of actual reported instances of modern slavery, between in 2018 6,993 potential victims were referred to the NRM, a 36% increase on 2017's figure of 5,142, and more than

⁵⁰ Elizabeth M. Wheaton, Edward J. Schauer, and Thomas V. Galli, "Economics of Human Trafficking," *International Migration* 48, no. 4 (2010): 114–41, <https://doi.org/10.1111/j.1468-2435.2009.00592.x>.

⁵¹ Bales, *Disposable People: New Slavery in the Global Economy*.

⁵² Matthew Robb, "International Child Sex Trafficking: Ravaged Innocence," *Social Work Today* 6, no. 5 (2006): 22–25.

⁵³ Baroness Butler-sloss, Frank Field, and John Randall, "Establishing Britain as a World Leader in the Fight against Modern Slavery," *Modern Slavery Bill Evidence Review* (Kent: Langford, 2013), [http://www.frankfield.co.uk/upload/docs/Modern Slavery Bill Evidence Review.pdf](http://www.frankfield.co.uk/upload/docs/Modern%20Slavery%20Bill%20Evidence%20Review.pdf).

⁵⁴ HM Government, "Modern Slavery Strategy," 2014, <https://www.gov.uk/government/publications/modern-slavery-strategy>.

double the amount recorded in 2015 – a year that saw modern slavery initially rise to the summit of the national policing agenda.⁵⁵

In truth, most practitioners, and those engaged with the anti-slavery movement, acknowledge that all of these numbers offer, at best, only a rough guide when it comes to estimating prevalence. The problem of quantifying what is in effect a hidden crime is far from insignificant, and well documented.⁵⁶ For instance, the figures used by the Global Slavery Index (GSI), figures which estimates there may be as many as 136,000 victims currently in the UK, have come in for significant scrutiny due to their small scope and the suitability of the methodology employed, while the Home Office themselves admit that their own official estimates probably represent only the ‘tip of the iceberg’.⁵⁷

What *can* be recognised with certainty is that the variety and nature of ways through which individuals are exploited in modern slavery are extremely varied, and they evolve constantly in response to external conditions. As a result, the type of exploitation seen reflects the demands for specific goods and services, and the rise of new forms of criminality. The next, and final, section of this chapter explores in more detail the types and nature of exploitation exhibited here in the UK.

⁵⁵ National Crime Agency, “National Referral Mechanism Statistics – End of Year Summary 2018,” 2019, <https://nationalcrimeagency.gov.uk/who-we-are/publications/282-national-referral-mechanism-statistics-end-of-year-summary-2018/file>; National Crime Agency, “National Referral Mechanism Statistics – End of Year Summary 2016,” 2017.

⁵⁶ Kristiina Kangaspunta, “Collecting Data on Human Trafficking: Availability, Reliability and Comparability of Trafficking Data,” in *Measuring Human Trafficking: Complexities and Pitfalls*, ed. Ernesto U. Savona and Sonia Stefanizzi (New York: Springer, 2007), 27–36, https://doi.org/10.1007/0-387-68044-6_4; Alexis A. Aronowitz, “Overcoming the Challenges to Accurately Measuring the Phenomenon of Human Trafficking,” *Revue Internationale de Droit Pénal* 81, no. 3 (2010): 493–511, <https://doi.org/10.3917/ridp.813.0493>.

⁵⁷ Anne T. Gallagher, “The Global Slavery Index Is Based on Flawed Data – Why Does No One Say So ?,” *The Guardian*, 2015, <https://www.theguardian.com/global-development/poverty-matters/2014/nov/28/global-slavery-index-walk-free-human-trafficking-anne-gallagher>; Anne T. Gallagher, *The International Law of Human Trafficking* (Cambridge University Press, 2011), <https://doi.org/10.1017/CBO9780511761065>; BBC News, “Modern Slavery and Trafficking ‘in Every UK Town and City,’” BBC, 2017, <https://www.bbc.com/news/uk-40885353>.

1.3.1 THE TYPE AND NATURE OF EXPLOITATION

The UK Home Office currently acknowledges 17 discrete types of modern slavery, as defined under the umbrella of offences contained within the Modern Slavery Act 2015. These are divided across four categories: labour exploitation, domestic servitude, sexual exploitation and criminal exploitation.⁵⁸ The typology covers everything from labour exploitation by single offenders, to domestic servitude by relatives and non-relatives, forced sex-work, CSE, sham marriages, forced begging and forced gang related criminality.

However, despite a seemingly organised and comprehensive framing of the issue by law enforcement, and the positive steps taken in the Modern Slavery Act 2015, many argue that government policies on migration, asylum, welfare and labour do more fuel the proliferation of exploitative and unfree labour than the Modern Slavery Act does to prevent it.⁵⁹ Despite posturing a hard stance against forced labour and trafficking, the UK's current policy on migration and labour; continued deregulation of the labour market and the intensification of anti-immigration policies and asylum, in some respects, indirectly promotes the exploitation of refugees and asylum seekers.⁶⁰ As a result, exploitative labour practices occur due to the interactions between wider labour law and restrictive migration and welfare policies. Many posit that rampant unchecked forms of capitalism, such as the neo-liberal labour market, create a fertile environment for unfree labour to thrive.⁶¹ The political and economic conditions resulting from Britain's decision to

⁵⁸ Christine Cooper et al., "A Typology of Modern Slavery Offences in the UK," Home Office, 2017, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/652652/typology-modern-slavery-offences-horr93.pdf.

⁵⁹ Peter Dwyer et al., "Forced Labour and UK Immigration Policy: Status Matters," *Joseph Rowntree Foundation* (York, 2011), <https://www.jrf.org.uk/report/forced-labour-and-uk-immigration-policy-status-matters>; Hannah Lewis et al., "Hyper-Precarious Lives: Migrants, Work and Forced Labour in the Global North," *Progress in Human Geography* 39, no. 5 (2015): 580–600, <https://doi.org/10.1177/0309132514548303>.

⁶⁰ Mick Wilkinson, "Demonising 'the Other': British Government Complicity in the Exploitation, Social Exclusion and Vilification of New Migrant Workers," *Citizenship Studies* 18, no. 5 (2014): 499–515, <https://doi.org/10.1080/13621025.2014.923702>.

⁶¹ Genevieve LeBaron and Nicola Phillips, "States and the Political Economy of Unfree Labour," *New Political Economy* 24, no. 1 (2018): 1–21, <https://doi.org/10.1080/13563467.2017.1420642>.

leave the EU may further exasperate this issue; creating conditions under which modern slavery can thrive by reducing the flow and pool of legal labour, and it is this labour that sectors such as hospitality and agriculture rely on.⁶² Despite this, few truly acknowledge the extent to which migrants and refugees are susceptible to forced and exploitative labour.

Those that *are* impacted by forced labour often find themselves caught in complex sub-contracting chains, operated by unlawful and unscrupulous agents. Complicated webs which make it incredibly difficult see just exactly who works for whom. These opaque supply chains are hard to audit and monitor, and ultimately make it even more difficult to safeguard the basic labour and human rights of the workers and potential victims embedded within them.⁶³ Frameworks have been put forward by organisations such as the International Labour Organisation (ILO) to tackle these issues, but these have also been criticised for focusing too heavily on the challenge of coercion in bilateral relationships between employers and employees, when in reality many are exploited in complicated and often obfuscated global chains of subcontracting.⁶⁴

The exploitation that stems from slavery is inherently tied up with social, political and legal status, migration, gender and economic systems. The breakup of the Soviet Union and the subsequent ascension of many of those former eastern bloc states to the EU has created a raft of willing workers with precarious social and economic backgrounds, but crucially, with full legal status to work within the EU.⁶⁵

Without doubt, the most globally pervasive and most frequently reported forms of exploitation that result from trafficking are sexual exploitation and forced labour. But across Europe the picture varies significantly across member states,

⁶² Steve French, "Between Globalisation and Brexit: Migration, Pay and the Road to Modern Slavery in the UK Hospitality Industry," *Research in Hospitality Management* 8, no. 1 (2018): 23–31, <https://www.ajol.info/index.php/rhm/article/view/176707>.

⁶³ Lewis et al., *Precarious Lives: Forced Labour, Exploitation and Asylum*.

⁶⁴ Genevieve Lebaron, "Subcontracting Is Not Illegal, but Is It Unethical? Business Ethics, Forced Labor and Economic Success," *The Brown Journal of World Affairs* 20, no. 2 (2014): 237–50; Bales, *Blood and Earth: Modern Slavery, Ecocide, and the Secret to Saving the World*.

⁶⁵ Lewis et al., *Precarious Lives: Forced Labour, Exploitation and Asylum*.

and the UK picture differs from that of Europe more broadly. In the EU, EUROSTAT suggest that 78% of trafficking cases involve some form of sexual exploitation, and 15% forced labour.⁶⁶ In the UK however, the National Crime Agency currently conflate figures for criminal exploitation and labour exploitation, meaning that those forced into criminality by their exploiters – including for the purposes of cannabis cultivation, are grouped alongside forced labour in the service, agricultural and other industries, inflating labour figures. The NCA's figures from 2018 suggest that 57% of UK referrals (including of minors) are for labour exploitation, and 28% for sexual exploitation.⁶⁷

In the UK, victims are trafficked from a wide variety of countries, with Albanian, Nigerian, Vietnamese and domestic UK victims featuring among the most prolific origin locations for those who are enslaved within the UK. These victims are transported for a wide variety of different purposes; the most popular examples being sexual, labour and criminal exploitation, in addition to domestic servitude.⁶⁸ Clearly, these figures give an overwhelming body of evidence to suggest that modern slavery is a complex, trans-national issue that requires a similarly global and comprehensive response.⁶⁹ This is also reflected by policies set by the European Commission, who have set human trafficking as one of its strategic priorities for EU member states.⁷⁰

⁶⁶ European Commission, "Data Collection on Trafficking in Human Beings in the EU," 2018, https://ec.europa.eu/home-affairs/sites/homeaffairs/files/what-we-do/policies/european-agenda-security/20181204_data-collection-study.pdf.

⁶⁷ National Crime Agency, "National Referral Mechanism Statistics – End of Year Summary 2018."

⁶⁸ National Crime Agency, "National Referral Mechanism Statistics - End of Year Summary 2017," 2018, <http://www.nationalcrimeagency.gov.uk/publications/national-referral-mechanism-statistics/2017-nrm-statistics/884-nrm-annual-report-2017/file>.

⁶⁹ Glynn Rankin and Nick Kinsella, "Human Trafficking – The Importance of Knowledge Information Exchange," in *Intelligence Management*, ed. Babak Akhgar and Simeon J Yates (London: Springer, 2011), 159–80; Europol, "The Internet Organised Crime Threat Assessment," 2015, <https://www.europol.europa.eu/content/internet-organised-crime-threat-assessment-iocta-2015>.

⁷⁰ European Commission, "Report on Trafficking in Human Beings in the EU," 2018, https://ec.europa.eu/home-affairs/sites/homeaffairs/files/what-we-do/policies/european-agenda-security/20181204_data-collection-study.pdf.

1.4 OBJECTIVES

Having outlined a working definition of modern slavery and identified its many guises, the remainder of this introduction is devoted to explaining the primary focus and objectives of the study, and the approach employed to achieve those objectives. Thus, in chapters 2, 3 and 4 the emphasis is on reviewing existing literature and theoretical approaches to the principal areas of investigation: (i) the nature and effectiveness of victim protection; and (ii) police attempts to track down and address the problem of modern slavery and human trafficking. These chapters will demonstrate how, despite a number of promising efforts to scale up anti-slavery response the UK, a number of key deficiencies in policing and multi-agency practice remain.

This introductory chapter will conclude by setting out the research questions and objectives fundamental to this study. A fifth chapter will then outline the methods to be employed in the study's execution, chapters six to eleven present a discussion of the study's findings, while the final chapter, twelve, provides a summary of the overall findings, their significance, and provides recommendations for future work and considerations for both policy and practice. The literature review which directly follows this introduction is comprised of three chapters, and further sets the scene for the study. These chapters introduce key concepts and review existing policy and practice related to modern slavery in the UK.

In this pivotal preliminary chapter the concept of modern slavery itself has been introduced and the global picture contextualised. The scale and nature of modern slavery is discussed alongside an assessment of the factors that drive the demand for slave labour, and the many disparate forms of criminality and exploitation to which those who fall victim to it are exposed. While latter sections focus on issues specific to the UK; including an analysis of the types of exploitation common to the region.

Throughout the remainder of the study, the problem of modern slavery is addressed from two interwoven sides – victim protection and threat reduction, in order to address the following research questions:

- How are multi-agency partnerships being used to combat modern slavery across the UK?
- What impact do those partnerships have on the measures taken to identify and support victims?
- What impact do those partnerships have on efforts to suppress and disrupt traffickers and slave masters?
- What key challenges are there to be overcome to ensure the success of multi-agency partnerships and, more broadly the efforts to effectively eradicate modern slavery?
- What are the key principles of effective multi-agency approaches used in response to modern slavery?

The first of these sides considers the perspective of victim protection, querying the level of service, protection and support offered to victims. The second aspect is the capacity of police to pursue and suppress the threat posed by traffickers and slave-masters; the criminal justice perspective. Later chapters cover the application of multi-agency partnerships in response to human trafficking; introducing and analysing the role of non-policing organisations from both of the aforementioned perspectives. The final chapter will introduce and critically discuss the response to modern slavery in the UK; including the national infrastructure and an assessment of the progress that has been made – particularly in relation to the Modern Slavery Act 2015.

PART 1 – THE LITERATURE REVIEW

2 MULTI-AGENCY PARTNERSHIPS

2.1 INTRODUCTION

Following the preceding chapter's general introduction to the issue of modern slavery, this chapter seeks to introduce the concept of multi-agency partnership working. Throughout, it reviews a number of prominent applications of multi-agency working, highlighting deficiencies, challenges and presumed benefits of working in partnership with other organisations before reviewing the current literature around their use within the anti-slavery movement specifically. The chapter also serves to highlight how a lack of rich qualitative study inhibits a sufficiently nuanced and authenticated understanding of multi-agency anti-slavery work, paving the way for a detailed piece of research that seeks to understand in detail the nature, dynamics and organisation of place-based multi-agency anti-slavery approaches to fill the current evidence gap.

Globally, efforts to effectively tackle, and eventually end, modern slavery and human trafficking continue to build momentum. Against this backdrop, the need for effective collaboration and cooperation between different organisations and bodies has emerged as a central element of the anti-slavery landscape, both in the UK and beyond.

These partnerships exist at across a number of different levels, from international networks, to cooperation between local organisations in individual towns and cities. Networks are driven by a range of actors, from international organisations, to faith groups, local councils and police forces. At the international level, the UN's Alliance 8.7 brings together a range of UN bodies, international NGOs, and the International Labour Organisation (ILO) to drive global action against slavery in service of the UN sustainable development goals.⁷¹ Other initiatives from faith groups such as the Catholic Church's Santa Marta Group and Church of England's Clewer Initiative have also increased in quantity and visibility at national and

⁷¹ Alliance 8.7, "Alliance 8.7," accessed January 13, 2019, <https://www.alliance87.org>.

regional levels.⁷² While the mission of these various collaborations varies in scope and objective, they attempt to leverage the skills, experience and role of multiple component partners in some form of anti-slavery activity; ranging from grass-roots activism, right through to establishing large international coalitions that aim to influence governments into national action. Some of these approaches act as strategic knowledge-sharing platforms, while others have more operational foci - attempting to mobilise frontline practitioners and members of the community to raise awareness and ultimately identify and prevent instances of exploitation. Such work further evidences the growing profile and impetus of partnerships related to public-policy programmes; and specifically, global anti-slavery efforts. But how are these partnerships organised? Who is involved? What activities do they undertake, and what impact do they have?

Multi-agency partnerships are not a concept unique to the anti-slavery movement. Partnerships have played a vital role in the upscaling of response to a number of social and justice issues in the past. Therefore, to set the scene for the use of multi-agency working in response to modern slavery, this chapter introduces the concept in general, explains the rationale for its application and discusses a number of pertinent examples from the UK's recent past. The final aspect of this chapter looks into the existing literature around the role of multi-agency partnerships in the UK's anti-slavery movement specifically, considering their role in the achievement of criminal justice outcomes, and also as a mechanism to aid in the identification, recovery and support of victims.

⁷² Santa Marta Group, "Santa Marta Group," accessed January 12, 2019, <http://santamartagroup.com>; The Clewer Initiative, "The Clewer Initiative," accessed January 12, 2019, <https://www.theclewerinitiative.org>.

2.2 WORKING IN PARTNERSHIP

Multi-agency partnerships have, since the 1990s, been increasingly put forward as a means of achieving public policy goals, and a credible alternative to large bureaucratic public service organisations.⁷³ Huxham conceptualises this as ‘collaborative advantage’, positing that when effective partnerships have the potential to be greater than the sum of their respective parts.⁷⁴ These partnerships, regardless of the public programme or agenda to which they are affiliated, typically involve organisations from across the public and private spheres - including government bodies, businesses, community groups and non-profit organisations.⁷⁵

Partnerships are not an especially new concept when it comes to providing safeguarding and support for individuals in response to vulnerability-based crime either. In fact, the statutory requirement for the formation of multi-agency partnerships in the UK can be seen as far back as 1989 and the introduction of the Children Act 1989. This Act, as its title suggests, stipulated the need for inter-agency collaboration between public organisations in relation to issues concerning the safeguarding of children and young people.⁷⁶ Since then, multilateral cooperation between the public, private and third sectors has increasingly been advocated for in response to a number of social issues. These include, community safety, social inclusion, neighbourhood regeneration, and, more recently, Child Sexual Exploitation (CSE), as well as in response to major incidents and disasters.⁷⁷

⁷³ Vivien Lowndes and Chris Skelcher, “The Dynamics of Multi-Organizational Partnership: An Analysis of Changing Modes of Governance,” *Public Administration* 26, no. 2 (1998), <https://onlinelibrary.wiley.com/doi/abs/10.1111/1467-9299.00103>.

⁷⁴ C Huxham, “Creating Collaborative Advantage,” *Management Learning* 28, no. 3 (1997): 381–83, <https://doi.org/Doi.10.1177/1350507697283015>.

⁷⁵ Lowndes and Skelcher, “The Dynamics of Multi-Organizational Partnership: An Analysis of Changing Modes of Governance.”

⁷⁶ Legislation.gov.uk, “Children Act 1989,” 1989, <https://www.legislation.gov.uk/ukpga/1989/41/contents>.

⁷⁷ Rita Cheminais, *Effective Multi-Agency Partnerships: Putting Every Child Matters into Practice* (London: Sage, 2009), <https://doi.org/10.4135/9781446288269>; Home Office, “National Referral Mechanism Pilots: Slavery Safeguarding Lead Guidance,” 2015, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/475716/2015-

It has also been suggested that partnerships offer avenues to empower social groups that, traditionally, are seen as maligned, excluded or under-represented, paving the way for their application against other issues such as modern slavery.⁷⁸

Public service austerity has functioned historically as a key motivator of multi-agency partnership development, with partnerships looked upon as an opportunity to 'do more with less', enabling organisations to share overheads, reduce effort duplication and bring together organisations that offer complementary services.⁷⁹ But despite successes in some areas and the promise of increased efficiency and effectiveness' they are also recognised to suffer endemic issues with information sharing; fragmented and duplicated needs assessment processes, poor levels of coordination and service integration, absences in responsibility among participating agencies, and unclear channels of accountability.⁸⁰ Issues of trust within partnerships have also been cited. For instance, observations made in one partnership setting focused on urban regeneration, identified that participation was often limited to high-ranking members of staff when trust between partners was deemed to be low, with the opposite being true when trust was deemed to be high.⁸¹ The same study also highlighted that participation often relied on social connections, friendships and personal trust, making it difficult for new partners to break in.

Perhaps one of the highest profile applications of multi-agency working comes from the field of child protection, and the use of Multi-Agency Safeguarding Hubs (MASH) and Local Safeguarding Children Boards (LSCBs). Unlike the UK's network

10-30_SSL_guidance_v1_0.pdf; Jyoti Laxmi Mishra, David K. Allen, and Alan D. Pearman, "Information Sharing during Multi-Agency Major Incidents," *Proceedings of the Association for Information Science and Technology* 48, no. 1 (2011): 1–10, <https://doi.org/10.1002/meet.2011.14504801039>.

⁷⁸ Cheminais, *Effective Multi-Agency Partnerships: Putting Every Child Matters into Practice*; Home Office, "National Referral Mechanism Pilots: Slavery Safeguarding Lead Guidance"; Mishra, Allen, and Pearman, "Information Sharing during Multi-Agency Major Incidents."

⁷⁹ Lowndes and Skelcher, "The Dynamics of Multi-Organizational Partnership: An Analysis of Changing Modes of Governance."

⁸⁰ Cheminais, *Effective Multi-Agency Partnerships: Putting Every Child Matters into Practice*.

⁸¹ Lowndes and Skelcher, "The Dynamics of Multi-Organizational Partnership: An Analysis of Changing Modes of Governance."

of anti-slavery partnerships, LSCBs do have a number of statutory objectives. These are set by the Children Act 2004, and include coordinating the activity of all bodies represented on the LCSB related to the protection and welfare of children, and to ensure the effectiveness of these bodies for those purposes.⁸²

There are a number of things that LCSBs and anti-slavery partnerships have in common. Both establish the importance and role of agencies such as housing, health, the social care services and immigration enforcement, the voluntary and private sectors, and, of course, the police, in the protection of those individuals who are considered at risk.⁸³ Moreover, across all their applications, multi-agency partnerships have sought to bring together, and combine the skills, responsibilities and expertise of practitioners from a number of different agencies. The partnerships bring these individuals, and the agencies they represent, together to share aims, information, tasks and responsibilities, towards addressing some of society's most pervasive and problematic issues.⁸⁴

⁸² Legislation.gov.uk, "Children Act 2004," 2004, <https://www.legislation.gov.uk/ukpga/2004/31/contents>.

⁸³ HM Government, "Working Together to Safeguard Children," 2015, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/592101/Working_Together_to_Safeguard_Children_20170213.pdf; The UK Border Agency was superseded by UK Visas and Immigration (UKVI), UK Immigration Enforcement and UK Border Force in 2013. For the purposes of this article they are discussed collectively under the title of "UK Immigration Enforcement" unless a specific agency is being referenced.

⁸⁴ Cheminais, *Effective Multi-Agency Partnerships: Putting Every Child Matters into Practice*.

2.3 ANTI-SLAVERY PARTNERSHIPS

Increasingly, multi-agency partnerships have been signposted as vital components of the UK's response to modern slavery. The Home Office Modern Slavery Strategy cites partnerships as an essential tool to increase frontline professionals' awareness of indicators and warning signs, improving the coordination of international activity, and enhancing working relationships with the private sector.⁸⁵ Furthermore, the UK's former Independent Anti-Slavery Commissioner, Kevin Hyland, who resigned in 2018, set the development of a strategic plan for partnerships as a top priority, targeting five key areas including:

- the development of regional partnership models to promote best practice;
- the development of partnerships with groups representing 'vulnerable' or hard-to-reach communities (such as homeless charities and diaspora community organisations);
- improving data collection and information sharing with international partners,
- raising awareness among the public, and;
- the development of academic partnerships to promote the use of research to plug key policy and evidence gaps.⁸⁶

Despite this visible support and advocacy for partnership work, there remains no statutory requirement for anti-slavery partnerships, and little acknowledgement from the Home Office of their role. In fact, Gardner has argued that, while national implementation of modern slavery responses are, for the most part, joined-up, and coupled with policy, policy solutions, and political advocacy, often they are

⁸⁵ HM Government, "Modern Slavery Strategy."

⁸⁶ Kevin Hyland, "Independent Anti-Slavery Commissioner: Letter of Resignation," 2018, <https://www.gov.uk/government/publications/independent-anti-slavery-commissioner-letter-of-resignation>; Independent Anti-Slavery Commissioner, "Strategic Plan 2015-2017," 2015, https://www.antislaverycommissioner.co.uk/media/1075/iasc_strategicplan_2015.pdf.

not translated into practical solutions at the local level.⁸⁷ Due to this, implementations are often inconsistent and very localized across the country. Formal guidance advising on the effective implementation of those responses, particularly related to multi-agency work, is also limited. But this is improving, and a number of useful resources are available in the absence of any formal statutory support. For instance, the National Audit Office's 'reducing modern slavery' report, 'Stolen Freedom' and the Local Government Association's guide to modern slavery (developed in conjunction with the IASC) all provide reference materials and some guidance on multi-agency work for those willing to seek it out.⁸⁸ While more recently an interactive toolkit, developed by the IASC and University of Nottingham, provides a pool of guidance and examples of promising practice for the formation and operation of anti-slavery partnerships.⁸⁹ The guide includes information on everything from membership, to objectives, resourcing, and establishing performance criteria.

Due to the relative autonomy afforded to local stakeholders, outside of those required to meet statutory requirements, partnerships have emerged somewhat organically – responding to local needs and driven by local anti-slavery entrepreneurs. But this also means there is inconsistency in organisation, naming conventions and focus. For instance, the terms 'network' and 'partnership' are often used interchangeably in practice – despite public policy and local governance scholars making clear differentiations between partnerships as an organisational structure, and networks as a mode of governance.⁹⁰

⁸⁷ Alison Gardner, "An Idea Whose Time Has Come? Modern Slavery, Multiple Streams Approach and Multi-Layer Policy Implementation," *Journal of Human Rights Practice* 10, no. 3 (2018): 461–81, <https://doi.org/10.1093/jhuman/huy022>.

⁸⁸ National Audit Office, "Reducing Modern Slavery," 2017, <https://www.nao.org.uk/wp-content/uploads/2017/12/Reducing-Modern-Slavery.pdf>; HMICFRS, "Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking"; Local Government Association, "Tackling Modern Slavery: A Council Guide," 2017, <https://www.local.gov.uk/modern-slavery-council-guide>.

⁸⁹ University of Nottingham, "Anti-Slavery Partnerships Toolkit," Independent Anti-Slavery Commissioner, 2018, <https://iasctoolkit.nottingham.ac.uk>.

⁹⁰ Lowndes and Skelcher, "The Dynamics of Multi-Organizational Partnership: An Analysis of Changing Modes of Governance."

Unlike the examples cited previously which highlight the role partnerships play in a safeguarding context, research by Gardner, Brickell and Gren-Jardan has highlighted that the actions of anti-slavery partnerships in many areas of the UK actually go far beyond safeguarding.⁹¹ In fact, their research shows that the most common activities anti-slavery partnerships engage in are not related to safeguarding activities at all. Instead, intelligence acquisition, training, and awareness raising feature as the most common activities. With survivor support, and victim identification and referral placing sixth and seventh on the list, respectively.

2.3.1 PARTNERSHIP INVOLVEMENT

The relative infancy of the current manifestation of the anti-slavery agenda means there is little academic evaluation or analysis of the role, impact and effectiveness of collective partnership approaches that aim to address modern slavery.⁹² Research around the involvement of different organisations in anti-slavery partnerships is also quite limited, with only one study of note by Gardner, Brickell and Gren-Jardan really unpicking the membership and actions of partnerships in any detail.⁹³ Gardner et al.'s study is of particular interest as it provides an overview of the national anti-slavery partnership picture, detailing the membership, activities and priorities of partnerships across the country. It also provides a basis of comparison for the regional units of analysis detailed in later

⁹¹ Alison Gardner, Claire Brickell, and Tatiana Gren-Jardan, "Collaborating for Freedom: Anti-Slavery Partnerships in the UK," *University of Nottingham / Independent Anti-Slavery Commissioner*, 2018, https://www.antislaverycommissioner.co.uk/media/1186/collaborating-for-freedom_anti-slavery-partnerships-in-the-uk.pdf.

⁹² The Centre for Social Justice, "It Happens Here: Equipping the United Kingdom to Fight Modern Slavery," 2014, [http://www.centreforsocialjustice.org.uk/UserStorage/pdf/Pdf reports/CSJ_Slavery_Full_Report_WEB\(5\).pdf](http://www.centreforsocialjustice.org.uk/UserStorage/pdf/Pdf%20reports/CSJ_Slavery_Full_Report_WEB(5).pdf) files/1464/fullrec.html; Sarah Edwards and Rachel Annison, "All Change: Preventing Trafficking in the UK," *The Anti-Trafficking Monitoring Group*, 2012, https://www.antislavery.org/wp-content/uploads/2017/01/atmg_all_change_prevention.pdf.

⁹³ Gardner, Brickell, and Gren-Jardan, "Collaborating for Freedom: Anti-Slavery Partnerships in the UK."

chapters of this study and allows questioning of whether certain identified phenomena are symptomatic of broader national trends.

Their study found a variety of organisations involved in partnerships. Typically, these involved the police, local authorities, the NHS and one or a number of NGOs as the most common members. The aforementioned study disclosed that nationally more than 50 different types of organisation were engaged in partnerships, ranging from the public, private, community, faith and voluntary sectors. Other prevalent organisations included the Fire service, Gangmasters and Labour Abuse Authority (GLAA), immigration enforcement, and tax authorities (HMRC).

The same work also highlighted difficulties in engaging the most appropriate and essential local partners, showing that different areas - especially those in less metropolitan localities were not 'able to access the same levels of voluntary and community sector support'.⁹⁴ This meant that police and local authorities were unable to leverage the specialist expertise charities that work in proximity of high-risk groups such as the homeless, or additional victim accommodation and care outside of the central government care contract with the Salvation Army. Gardner et al. also highlighted feedback from partnerships that demonstrates the extended importance of voluntary sector organisations, identifying them as being well placed to develop trust-relationships with at-risk groups and victims, and providing specialist support.⁹⁵

⁹⁴ Gardner, Brickell, and Gren-Jardan, 15.

⁹⁵ Gardner, Brickell, and Gren-Jardan, "Collaborating for Freedom: Anti-Slavery Partnerships in the UK."

2.3.2 MONITORING AND EVALUATION

The performance and impact of partnerships, as with the other aspects of the national response, remains a grey area. A government commissioned independent review into the effectiveness of the Modern Slavery Act 2015 by barrister Caroline Haughey does however shed some light on the effectiveness of the Act's implementation. The resulting report, timed roughly a year after the Modern Slavery Act 2015 came into force, cited the potential significance of partnerships' contribution at a local level, and provided a number of associated recommendations towards improving their impact.

From a partnerships perspective specifically, Haughey's report (discussed in detail in section 4.1) drew attention to inconsistencies in the collection and synthesis of data and intelligence from different partners, and called for improvements that built upon pre-existing relationships that were evident in some geographic regions between police, local authorities and other partners, including the voluntary sector, in relation to CSE.⁹⁶ Despite being a criminal justice focused evaluation, the report also cited the specific need for enhanced cooperation between police and other statutory agencies, as well improved levels of NGO coordination in order to increase the quantity and quality of victim referrals.

Since 2014, modern slavery has been identified nationally as a significant adult social care risk, placing the issue firmly within the remit of Safeguarding Adult Boards.⁹⁷ The active participation of Local Adult Safeguarding Boards (LSABs) in anti-slavery partnerships has been cited as a key vector through which these agencies can work alongside others, such as the police. Across some areas of the UK partnerships have played a key role in the establishment of local processes and action plans, and the roll-out training and awareness campaigns, ensuring that

⁹⁶ Caroline Haughey, "The Modern Slavery Act Review: One Year On," *Home Office*, 2016, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/542047/2016_07_31_Haughey_Review_of_Modern_Slavery_Act_-_final_1.0.pdf.

⁹⁷ Legislation.gov.uk, "Care Act 2014" (2014), <http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>.

frontline professionals are sufficiently aware of the indicators of issues such as forced and child labour, and domestic servitude.⁹⁸

The need for collaboration between partners is further necessitated by the role played by organisations such as the Salvation Army, the NGO organisation that holds the central UK government contract for housing modern slavery victims within the NRM. In social care settings, partnerships have been cited as beneficial in helping to identify improvements in joint-working, practice and in the development of local policy, procedure, guidance and training. This reinforces the notion that safeguarding is “everyone’s business” and highlights a number of benefits potentially attributable to anti-slavery partnerships.⁹⁹

Despite the aforementioned positives, existing work has also identified serious deficiencies in the evidence and tools being used to monitor the effectiveness of partnerships.¹⁰⁰ Many of the means currently used to evaluate partnerships are often anecdotal, and, in some cases entirely non-existent. Consequently, the requirement for significant improvements to data collection and analysis has been identified in order to ensure there is a more complete, evidence-based picture to attribute, tangibly, the successes and impacts of partnership working in response to modern slavery. This is reinforced by findings from the UK’s National Audit Office which posited that without effective oversight of anti-slavery efforts, the government stands no chance of achieving its goal of significantly reducing the prevalence of modern slavery in the UK.¹⁰¹

The Home Office’s Strategic Centre for Organised Crime has also expressed the need to understand the emerging picture of serious and organised crime

⁹⁸ Craig et al., “Contemporary Slavery in the UK.”

⁹⁹ Department of Health and Social Care, “Statutory Guidance to Support Local Authorities Implement the Care Act 2014,” 2016, <https://www.gov.uk/guidance/care-and-support-statutory-guidance>; Adi Cooper and Claire Bruin, “Adult Safeguarding and the Care Act (2014) – the Impacts on Partnerships and Practice,” *The Journal of Adult Protection* 19, no. 4 (2017): 209–19, <https://doi.org/10.1108/JAP-03-2017-0009>.

¹⁰⁰ Ruth van Dyke, “Monitoring and Evaluation of Partnerships in England and Wales,” *Anti-Trafficking Review*, no. 8 (2017): 131–46, <https://doi.org/10.14197/atr.20121788>.

¹⁰¹ National Audit Office, “Reducing Modern Slavery.”

partnerships more generally. The notion that the police cannot effectively counter modern slavery in isolation is a fairly widely accepted notion. After all, the primary function of police is law-enforcement, with victim protection falling under the remit of local authorities and NGOs, reinforcing the need to “establish effective partnership arrangements with a range of agencies to co-ordinate local activity and build up intelligence”.¹⁰² Despite the fact this work is clearly ongoing around the UK, not all forces whose practices were reviewed during the 2017 Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) inspection showed evidence of formalised partnership working. While in those that did show evidence, it was often considered patchy, and did not effectively facilitate efforts to understand local threats and risks.¹⁰³

The Haughey report identified that, at a regional level specifically, some forces have established “excellent working partnerships” with partner stakeholders, fulfilling roles that encourage information and intelligence sharing from frontline workers, such as those who inspect manufacturing, or other establishments, that use low-skill labour.¹⁰⁴ The report also cites “immeasurable” benefit in the value of these stakeholders when it comes to working directly with victims, particularly in instances where they may be reluctant to talk to police directly, and in situations where local authorities are able to provide remedial safeguarding.¹⁰⁵ However, other work has established that while in some regions partnerships are mature, this is not a ubiquitous trend, and across the majority of regions, partnership working on the whole was still in its infancy.¹⁰⁶

¹⁰² Haughey, “The Modern Slavery Act Review: One Year On,” 10.

¹⁰³ Haughey, 10.

¹⁰⁴ Haughey, 17.

¹⁰⁵ Haughey, 17.

¹⁰⁶ Gardner, “An Idea Whose Time Has Come? Modern Slavery, Multiple Streams Approach and Multi-Layer Policy Implementation.”

2.3.3 PARTNERSHIP MODELS

While this study primarily focuses on regional anti-slavery partnerships, as perhaps the most pervasive partnership model operating within the UK, other partnership arrangements are being employed around the country. At the National level, the aptly named 'National anti-trafficking and modern slavery network' was formed to focus on raising awareness nationally. The network was established by West Yorkshire Police and Crime Commissioner (PCC) Mark Burns-Williamson, the Association of Police and Crime Commissioners (APCC) lead for Modern Slavery, in January 2016. The network was set-up to provide a forum for PCCs across the UK to coordinate efforts on modern slavery, establishing an environment where discourse could take place, promoting the inclusion of modern slavery into police and crime plans, raising awareness of specific issues, and providing a forum for sharing effective practices.¹⁰⁷ Findings by HMICFRS have also tried to reinforce the position of PCCs in the anti-slavery agenda, highlighting the importance of their role in driving change, improving performance, and funding partnership activities with other statutory and non-statutory organisations; including the rollout of training, and the appointment of regional Modern Slavery coordinators.¹⁰⁸

As highlighted previously, regional partnerships are among the most common and pervasive form of multi-agency working currently being employed. Despite this, a national mapping exercise has discovered that their existence is not quite ubiquitous, and although many places had arrangements in place, their complexity and participation levels varied significantly around the country.¹⁰⁹ These findings are also supported by HMICFRS who discovered that, in many forces, activities

¹⁰⁷ Office of the Police & Crime Commissioner for West Yorkshire, "National Anti-Trafficking and Modern Slavery Network," 2016, <https://www.westyorkshire-pcc.gov.uk/get-involved/campaigns/human-trafficking/national-anti-trafficking-and-modern-slavery-network.aspx>.

¹⁰⁸ HMICFRS, "Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking."

¹⁰⁹ Gardner, "An Idea Whose Time Has Come? Modern Slavery, Multiple Streams Approach and Multi-Layer Policy Implementation."

that target partnership engagement with organisations from other statutory and non-statutory organisations were “at best, embryonic”, with some forces demonstrating no evidence of having formalised partnership arrangements in place at all.¹¹⁰ A common complaint, and reason for the fragmented nature of many partnerships is due to a lack of resources, with many statutory and voluntary organisations subject to funding cuts under government austerity measures since 2010, making it difficult to meet existing statutory requirements, without undertaking additional unfunded responsibilities.¹¹¹ As a result of this largely ‘hands-off’ approach from the Home Office, local practitioners are left to seek out their own resources and define process and procedure themselves, leaving scope for unnecessary duplication.¹¹²

Despite this trying environment, cooperation between police and other organisations *has* manifested in a number of promising practices. During their inspections, HMICFRS identified that in one specific region police carried out joined inspections of high-risk businesses such as hand car-washes in collaboration with the Health and Safety Executive (HSE) and the Department of Work and Pensions (DWP).¹¹³ The operations were conducted as hand-car washes have been highlighted nationally as one of the business types known to be common sites of exploitation. Multi-agency visits enabled these businesses to be screened for non-compliance across a number of areas, including potentially exploitation employment practices in addition to health and safety and environmental health practices. While in another region, police continue to work closely with businesses to raise awareness of modern slavery indicators among frontline workers in industries such as banking and job agencies who may encounter victims directly,

¹¹⁰ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking,” 33.

¹¹¹ Vivien Lowndes and Alison Gardner, “Local Governance under the Conservatives: Super-Austerity, Devolution and the ‘Smarter State,’” *Local Government Studies* 42, no. 3 (2016): 357–75, <https://doi.org/10.1080/03003930.2016.1150837>; National Audit Office, “Financial Sustainability of Local Authorities,” 2014, <https://www.nao.org.uk/report/financial-sustainability-of-local-authorities-2014/>; National Audit Office, “Reducing Modern Slavery.”

¹¹² Gardner, “An Idea Whose Time Has Come? Modern Slavery, Multiple Streams Approach and Multi-Layer Policy Implementation.”

¹¹³ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking.”

or in the case of banks specifically, be able to identify accounts showing suspicious or fraudulent activity that might indicate exploitation.¹¹⁴

However, partnerships have been seen to be experiencing a number of problems that are not solely connected to resourcing. For one, it has been posited that the national framing of the modern slavery problem (through the Modern Slavery Act 2015) as a criminal justice issue does not necessarily align with the required partnership response, and the role of many of the partners involved in those partnerships. Many of the statutory and non-statutory organisations who frequently engage within regional partnerships undertake roles associated with victim safeguarding and human rights protections – which currently, are not adequately framed within the national strategy.¹¹⁵

¹¹⁴ HMICFRS.

¹¹⁵ Gardner, “An Idea Whose Time Has Come? Modern Slavery, Multiple Streams Approach and Multi-Layer Policy Implementation.”

2.4 SUMMARY

Key Findings:

- Multi-agency approaches have been used to achieve ‘collaborative advantage’ in response to a number of pervasive and problematic societal issues, including Child Sexual Exploitation (CSE) and domestic abuse.
- Since the introduction of the Modern Slavery Act in 2015, an organic national network of multi-agency partnerships has emerged in response to modern slavery.
- These partnerships are largely unfunded and lack statutory guidance or footing, and are often driven forward by a small number of key individuals in each region.
- The police are key on this agenda, and are the most common coordinators and chairs of multi-agency partnerships around the country.
- Despite an appreciation that multi-agency partnerships can play an important role in anti-slavery work, there is relatively little published about how they are organised, how they operate and how they assist partners to identify and support potential victims, and assist in the police in pursuing perpetrators.
- There is also a lack of central government oversight or partnerships which inhibits a true appreciation of the effectiveness of partnerships and the activities they undertake.
- Limits in the amount of existing literature available establish clear scope for a focused qualitative study that seeks to understand the nature, dynamics and organisation of place-based multi-agency anti-slavery work.

In this chapter, the concept of multi-agency collaboration has been introduced as a means of achieving collaborative advantage, particularly in response to modern slavery. The roles and membership of partnerships have been highlighted and a number of promising practice areas identified. Despite some success however, it is still widely acknowledged that, nationally, the UK's partnership work is inconsistent, with little evidence that most forces have processes in place to evaluate the effectiveness of partnership activity, due in no small part due to a lack of direct resourcing.¹¹⁶ Currently, local bodies receive little in the way of support or resource to implement measures around modern slavery and the burden of translating national policy and priorities into local action and intervention is therefore largely dependent on the proactivity of specific individuals, or individual institutions.¹¹⁷ Lowndes and Squires have referred to these as 'special people', describing them as individuals that make collaboration work through their ability to build relationships across organisational boundaries and instil a culture of proactivity within others.¹¹⁸

In many cases this reliance on the efforts of a few dedicated 'special people' continues to contribute to inconsistencies and problems around slavery prevention, victim identification, support and recovery. Despite this, some promising practices have been highlighted and the nature of both these positives and developing areas will be reviewed in more detail in the following chapter, focusing on reviewing the progress of the national modern slavery response.

Further, while the Haughey and HMICFRS reports have touched upon partnerships and some areas of effective practice, there lacks an overarching appreciation of their specific role in anti-slavery work. In particular, additional work is needed to show how multi-agency approaches are aiding the police and other statutory

¹¹⁶ HMICFRS, "Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking."

¹¹⁷ Alison Gardner, "Thinking Globally, Acting Locally: Is Local Public Policy Anti-Slavery's Missing Link," UoN Blogs, 2017, <http://blogs.nottingham.ac.uk/rights/2017/03/23/walkfree2/>; Gardner, "An Idea Whose Time Has Come? Modern Slavery, Multiple Streams Approach and Multi-Layer Policy Implementation."

¹¹⁸ Vivien Lowndes and Sharon Squires, "Cuts, Collaboration and Creativity, Public Money and Management," *Public Money and Management* 32, no. 6 (2012): 401–8, <https://www.tandfonline.com/doi/abs/10.1080/09540962.2012.728779>.

organisations to meet their responsibilities, to overcome challenges that would not be possible in isolation, or conduct activities that are in some way enhanced through working within a multi-agency setting. While Gardner et al.'s report provides an excellent starting point from which understanding around place-based multi-agency anti-slavery work can be developed, there remains scope for a more detailed and in-depth qualitative study to focus in on the nature, dynamics and organisation of place-based multi-agency work to fill gaps in the understanding of the work being done in this regard, and its impact.

3 THE UK ANTI-SLAVERY INFRASTRUCTURE

In this penultimate literature review chapter, the mechanisms and measures employed in the UK to combat slavery are discussed. This is primarily divided into three subsections, focusing firstly on the UK's victim support process – the National Referral Mechanism, the Home Office Modern Slavery Strategy, and finally, the Modern Slavery Act 2015. Within this chapter the role of these measures is described, focusing on a number of key provisions within each of them that bear importance to the discussion to follow in the presentation of the research results.

The chapter goes on to summarise how, despite a number of promising steps seen since the introduction of the Modern Slavery Act 2015, and iterative revisions to the National Referral Mechanism, there are a number of key issues that continue to challenge the development of an effective UK response – particularly related to providing ongoing support and care for identified potential victims, the numbers of which have continued to increase year-on-year since 2015.

3.1 THE NATIONAL REFERRAL MECHANISM

The NRM, introduced in 2009, is the mechanism used to meet the UK's commitment and obligation to the 2005 Council of Europe Convention on Action against Trafficking in Human Beings regarding the identification and protection of victims.¹¹⁹ The NRM provides the framework through which modern slavery victims in the UK are formally identified and referred for national support.¹²⁰ The framework was designed to help identify victims – towards ensuring that, once

¹¹⁹ Council of Europe, "Council of Europe Convention on Action against Trafficking in Human Beings" 7, no. 7 (2012): 1–30.

¹²⁰ Home Office, "National Referral Mechanism Guidance: Adult (England and Wales)," n.d., <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales#access-to-support>.

identified, they are provided access to appropriate levels of care, including access to suitable levels of accommodation and support.¹²¹

The NRM process itself takes place in two main phases, referred to as the 'reasonable grounds' and 'conclusive grounds' decisions. Upon the initial identification of a potential victim, the referring organisation, with the consent of that suspected victim, completes an NRM referral form. The form is subsequently passed to, what the government refers to as, a competent authority for review, that is, a trained decision maker who is tasked with deciding whether there are 'reasonable grounds' to suspect that the individual in question is in fact a victim of modern slavery. Currently this is done centrally by the Home Office, and UKVI in instances where victims from outside of the European Economic Areas (EEA) are involved. The Home Office and UKVI aims to make initial reasonable grounds decisions within five days. Upon receipt of a successful reasonable grounds decision, victims are provided with a minimum of 45 days of ongoing support and reflection regardless of legal status while the conclusive grounds decision is reached.¹²² While in the reflection period victims are entitled to provisions including accommodation, medical care, counselling and emotional support, immigration advice, and education and employment guidance.¹²³

¹²¹ Home Office.

¹²² The National Crime Agency, "The National Referral Mechanism," accessed September 26, 2018, <http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism>.

¹²³ Stop the Traffik, "Human Trafficking: What Is It?," n.d., <https://www.stopthetraffik.org>.

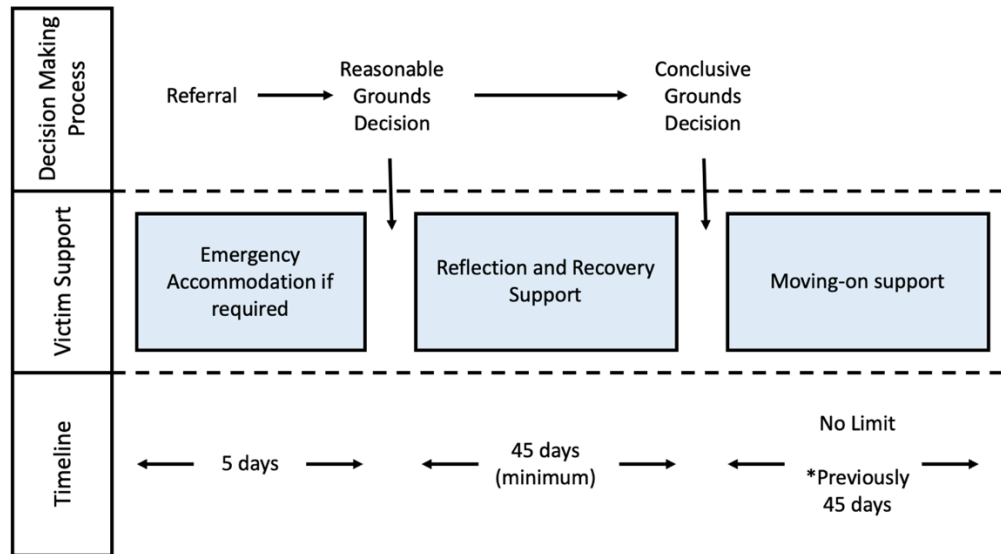


Figure 1: The National Referral Mechanism

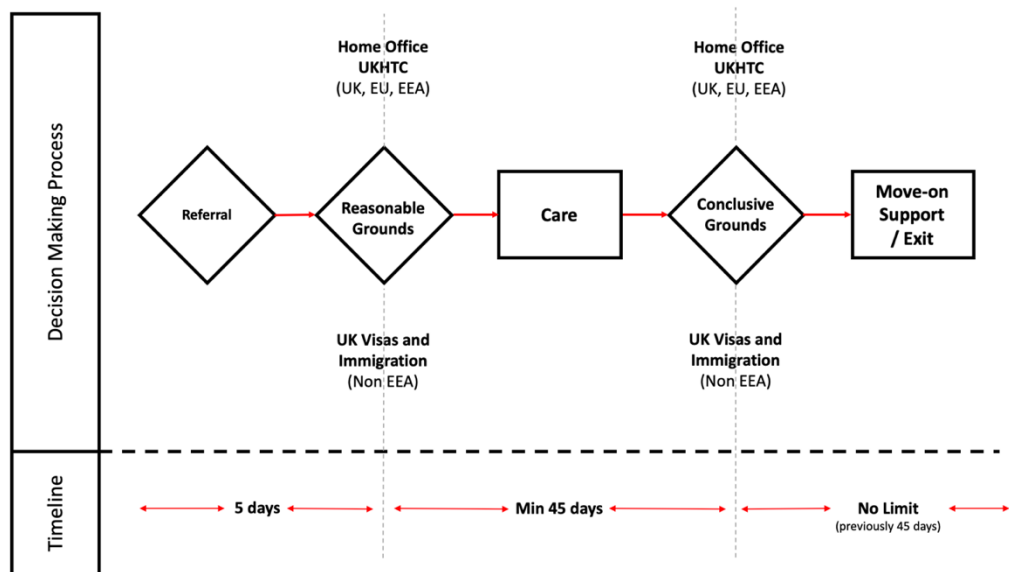


Figure 2: The NRM Decision Making Process

Within the conclusive grounds decision-making process, it is the competent authority's responsibility to decide 'conclusively' whether an individual is a victim of trafficking or slavery based on the information available. Until recently, victims that received successful conclusive grounds decisions typically had just two weeks of additional ongoing support and accommodation, following an initial 45, in

which to re-integrate themselves into the community.¹²⁴ Following revisions announced by the Home Office at the end of 2017, this period was subsequently extended to a further 45 days, before even more recently being dropped entirely.

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Following the latest revisions, support is now provided through an ongoing needs-based assessment process, or for as long as the victim requests it – with no defined minimum.¹²⁶ Due to the temporal proximity of this latest amendment, there is no data available to assess the implementation or impact of this change. However, a recent cost-benefit analysis by the University of Nottingham suggests that extensions to the minimum victim support period are actually likely to decrease the net cost to the public purse by significantly enhancing the ability and likelihood that victims can contribute to the national economy post NRM.¹²⁷ Prior to the potential for indefinite ongoing support, many victims, particularly those who are not British nationals, who often have little knowledge of state welfare systems and have little in the way of personal support structures were considered to be at extreme risk of destitution and further exploitation.¹²⁸

Since the enactment of the Modern Slavery Act 2015 (see section 3.3) the number of referrals to the NRM across the UK has increased year-on-year.¹²⁹ While increasing figures could be used as a metric to indicate improvements in the

¹²⁴ Home Office, “National Referral Mechanism Guidance: Adult (England and Wales).”

¹²⁵ Sarah Newton, “Modern Slavery Victims to Receive Longer Period of Support,” Home Office, 2017, <https://www.gov.uk/government/news/modern-slavery-victims-to-receive-longer-period-of-support>.

¹²⁶ Kate Roberts, “UK Survivors Win the Right to Long Term Support,” Anti-slavery International, 2019, <https://www.antislavery.org/win-uk-slavery-survivors/>.

¹²⁷ Andrea Nicholson et al., “The Modern Slavery (Victim Support) Bill - A Cost Benefit Analysis,” *University of Nottingham*, 2019, <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/the-modern-slavery-victim-support-bill-a-cost-benefit-analysis.pdf>.

¹²⁸ Gary Craig, “The UK’s Modern Slavery Legislation: An Early Assessment of Progress,” *Social Inclusion* 5, no. 2 (2017): 16, <https://doi.org/10.17645/si.v5i2.833>.

¹²⁹ National Crime Agency, “National Referral Mechanism Statistics - End of Year Summary 2017”; National Crime Agency, “National Referral Mechanism Statistics – End of Year Summary 2014,” 2014, <http://www.nationalcrimeagency.gov.uk/publications/502-national-referral-mechanism-statistics-end-of-year-summary-2014/file>.

efforts and ability of police and other statutory organisations to identify victims, an independent government commissioned review by barrister Caroline Haughey has highlighted that much work is still to be done. In the review Haughey suggests that if the “police service had responded strongly to the Modern Slavery Act 2015” then referral numbers would be much higher than those currently reported.¹³⁰ Currently, though there is an upward trend, increases have in the main been incremental. Though these figures are rising, there is no reliable baseline or indication of just how many victims are out there, making evaluation of any measures based on numbers alone impossible.¹³¹ Figures representing the number of national referrals made between January 2014 and June 2017 are included in Figure 3.

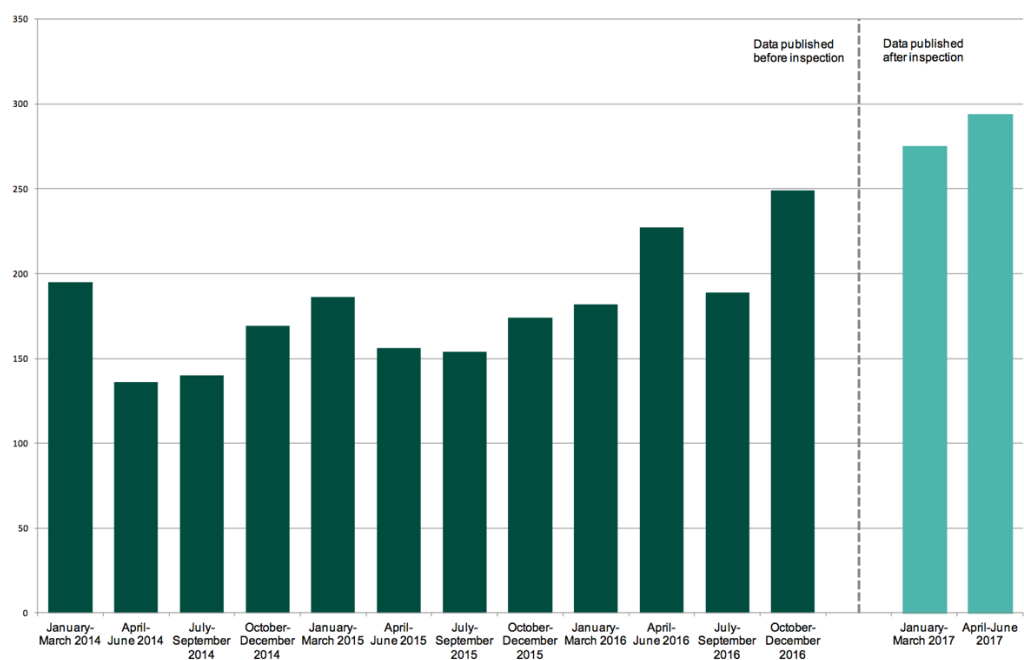


Figure 3: National NRM Referrals - January 2014 - June 2017¹³²

¹³⁰ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking,” 46.

¹³¹ National Audit Office, “Reducing Modern Slavery.”

¹³² HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking,” 47.

In the calendar year 2016, 2,527 adult victims in total were referred through the UK's NRM, representing a 51% increase overall compared to the figures from 2014 when the modern slavery strategy was first introduced.¹³³ While in 2018, 6,993 victims were referred to the NRM overall, a 36% increase on the 5,142 referrals made over the duration of 2017.

The NRM figures provided above, alongside widely acknowledged issues with gaps in the knowledge of staff as to the NRM process, and the indicators of modern slavery more generally, cause significant concerns that victims continue to remain hidden. As a result, victims are denied access to the support and protections legally available to them and the crimes to which they are being subjected continue on, unpunished.¹³⁴ There is also little data or evidence available to make an educated guess as to why referral numbers are increasing. Is it due to increased levels of awareness and intervention? or an increase in overall prevalence? The Home Office does not know.¹³⁵ Current data also conflates referrals based around labour and criminal exploitation making meaningful distinctions based on NRM data related to trends in exploitation impossible. Figures from the emerging 'county lines' child trafficking trend are also now included in the NCA's numbers and account for a large percentage of child referrals, distorting analyses further.

Due to continued gaps in data recording, and little in the way of formal monitoring and evaluation, there are also no metrics available to suggest when the number of referrals is expected to fall. As a result, the (perceived) prevalence of modern slavery cannot serve as the underlying qualifier of success of the modern slavery strategy, or the measures being implemented around the country that stem from it. There are also other concerns on this front. Currently, a huge disparity exists between forces with the highest and lowest numbers of referrals. Since 2009, six forces returned fewer than 10 referrals (until 2017), while those with the highest returned more than 900.¹³⁶

¹³³ National Audit Office, "Reducing Modern Slavery."

¹³⁴ HMICFRS, "Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking."

¹³⁵ National Audit Office, "Reducing Modern Slavery."

¹³⁶ National Audit Office.

Police, other stakeholders, commenters and advocacy organisations have also continued to express unease over the amount of time available to reach conclusive grounds decisions and prepare court cases. Again, referring to Haughey’s review one officer remarked during interview that 45 days was nowhere near enough time to “decompress” what could amount to “10 years of incarceration”.¹³⁷ The same review also identified low levels of awareness regarding the potential to extend the 45-day period of support available to victims, often rendering them homeless and destitute. The relative success of increasing numbers of NRM referrals has also emphasised the apparent lack of victims who wish to engage, as victims can elect to not have their case referred to the police. However, first responder organisations, such as the Salvation Army, who are responsible for a significant proportion of referrals, should still adhere to the Duty to Notify, which would result in police being notified of referral in their area, only with personal information about the victim omitted.

3.1.1 NRM REFORM

In October 2017, the Home Office unveiled plans to reform certain aspects of the NRM; including extensions to the period of ‘moving-on’ support for victims, additional drop in services, and improvements to access and awareness of other transition services. Under the new standards victims have 45 days of post conclusive grounds care, up from 14, in addition to six months of ‘drop in’ aftercare.¹³⁸ In 2019, the limited on post-decision support for survivors was removed entirely after increasing pressure from a coalition of UK anti-slavery NGOs, the Anti-Trafficking Monitoring Group (ATMG). The ATMG have long argued that the existing model of survivor support with its 14, and then 45-day limit does not provide survivors with a credible long-term pathway out of exploitation, leaving many vulnerable to further exploitation after support cuts-off.¹³⁹ The

¹³⁷ Haughey, “The Modern Slavery Act Review: One Year On,” 25.

¹³⁸ Newton, “Modern Slavery Victims to Receive Longer Period of Support.”

¹³⁹ Roberts, “UK Survivors Win the Right to Long Term Support.”

decision was reached as a result of a landmark legal case, which determined that limiting survivor aftercare put the UK in breach of the Council of Europe Convention Against Trafficking in Human Beings requirement to provide support for as long as victims need or want it. The case, involving victims of sexual exploitation and forced cannabis cultivation, from Albania and Vietnam respectively, successfully argued that stripping victims of financial assistance and other forms of support after 45 days, regardless of circumstances, indicated a clear failure to provide proper needs-assessment to victims.¹⁴⁰

While a welcome move, there remain attempts to further strengthen the support provisions available to survivors. The Modern Slavery (Victim Support) Bill current being progressed through parliament proposes to extend the minimum period of support to 12 months.¹⁴¹ These new proposals, led by Frank Field, are underpinned by research from the University of Nottingham's Rights Lab which estimate that extending survivor support would provide victims with improved opportunity to become economically active, with lower risks of homelessness and further exploitation, and leaving them more able to assist law enforcement in prosecutions against perpetrators. Not only that, but the same research suggests that the public purse would have benefitted by up to £21.3m had all victims that were successfully referred in 2017 been able to access a minimum of 12 months of support.¹⁴²

¹⁴⁰ Duncan Lewis Solicitors, "Home Office Concedes That Their 45 Day Policy for Providing Support for Victims of Trafficking Is Unlawful," 2019, [https://www.duncanlewis.co.uk/news/Home_Office_concedes_that_their_45_day_policy_for_providing_support_for_victims_of_trafficking_is_unsatisfactory__\(28_June_2019\).html](https://www.duncanlewis.co.uk/news/Home_Office_concedes_that_their_45_day_policy_for_providing_support_for_victims_of_trafficking_is_unsatisfactory__(28_June_2019).html).

¹⁴¹ Lord McColl of Dulwich, "Modern Slavery (Victim Support) Bill," *House of Lords*, 2017, <https://publications.parliament.uk/pa/bills/lbill/2017-2019/0004/18004.pdf>.

¹⁴² Nicholson et al., "The Modern Slavery (Victim Support) Bill - A Cost Benefit Analysis."

3.1.2 THE NRM PILOT

Following criticism of the existing NRM process, pilots were established in two areas of the UK in 2015 - West Yorkshire and the South West (consisting of Avon and Somerset, Devon and Cornwall, Dorset, Gloucestershire and Wiltshire).¹⁴³ The pilot sought to address identified deficiencies related to low levels of awareness, the quality and timeliness of decision making and absences in information sharing. While the pilots were originally scheduled to run for just one year, between August 2015 and July 2016, they were extended for additional eight months until March 2017 so that more evidence could be gathered.¹⁴⁴ Since then, despite publishing an evaluation of the pilots in late 2017, the Home Office is yet to implement any changes to the core NRM process.¹⁴⁵

The NRM pilot itself, while retaining the main stages of the existing process, introduced two new roles; Slavery Safeguarding Leads (SSLs) and Multi-disciplinary decision-making panels (MDPs). Across the pilot areas SSLs were appointed from various statutory agencies, including police, local authorities, UKVI, the NHS, GLAA and others. The SSLs facilitate three key functions: 1) making reasonable grounds decisions on cases referred to them by frontline workers; 2) helping and advising on the NRM process and the identification of potential victims; and 3) raising awareness of modern slavery within their respective organisations.¹⁴⁶ The end-goal being that the time-taken to reach a reasonable grounds decision should be reduced to 48 hours, down from the original pre-pilot target of five days.¹⁴⁷

¹⁴³ Nicola Ellis, Christine Cooper, and Stephen Roe, "An Evaluation of the National Referral Mechanism Pilot," *Home Office*, 2017, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/653703/evaluation-national-referral-mechanism-pilot-horr94.pdf.

¹⁴⁴ National Audit Office, "Reducing Modern Slavery."

¹⁴⁵ Ellis, Cooper, and Roe, "An Evaluation of the National Referral Mechanism Pilot."

¹⁴⁶ Ellis, Cooper, and Roe.

¹⁴⁷ Home Office, "National Referral Mechanism Pilots: Slavery Safeguarding Lead Guidance."

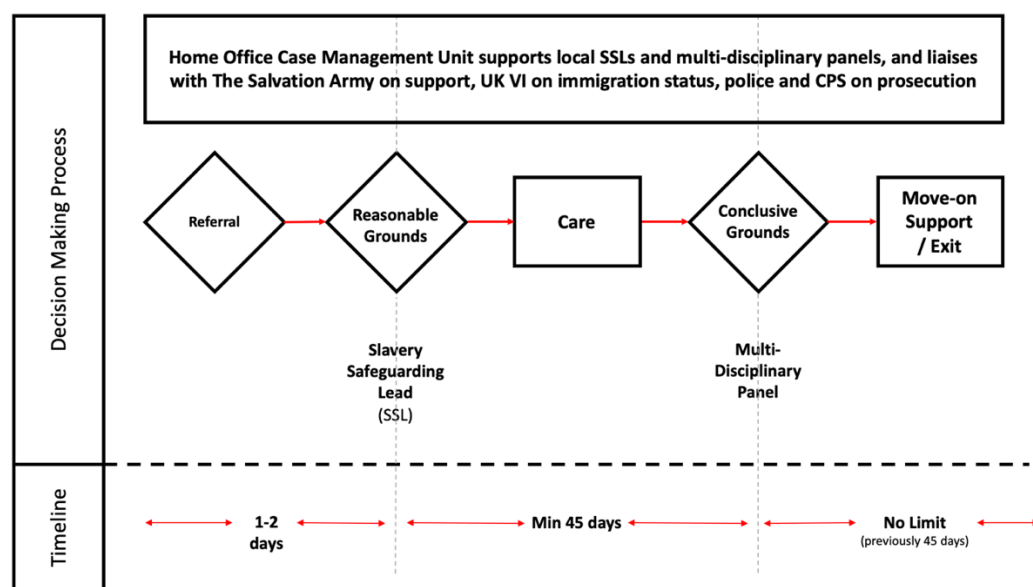


Figure 4: The NRM Pilot Process

Across both pilot regions, MDPs were also established to manage conclusive grounds decisions. The panels, led by paid chairs appointed by the Home Office, are comprised of volunteers from NGOs and statutory organisations. Meeting roughly every two weeks MDPs discussed all cases that receive positive reasonable grounds decisions in order to establish 'conclusively' whether the claim of the potential victim is in fact valid.¹⁴⁸

From data collected throughout the duration of the study, Ellis, Cooper and Roe established that there was visible increase in the quantity of referrals made by the pilot areas on previous years, when compared to the numbers recorded by non-pilot area.¹⁴⁹ Similarly, no statistically significant increase in the number of successful reasonable grounds decisions nor conclusive grounds decisions, as a result of the pilot, was made either. One area where the pilots did result in significant improvement was the time taken to make reasonable grounds decisions. In the pilot areas, the time taken reduced to a median average of one

¹⁴⁸ Ellis, Cooper, and Roe, "An Evaluation of the National Referral Mechanism Pilot."

¹⁴⁹ Ellis, Cooper, and Roe.

day, down from six. Over the same period the median average in non-pilot areas remained at six days.¹⁵⁰

		PILOT PERIOD		PREVIOUS YEAR (2016)	
		PILOT AREAS	NON- PILOT AREAS	PILOT AREAS	NON- PILOT AREAS
REASONABLE GROUNDS (RG) DECISION	PROPORTION OF CASES WITH +VE RG DECISION	89%	83%	88%	87%
	DAYS BETWEEN REFERRALS AND RG DECISION	1 DAY	6 DAYS	6 DAYS	6 DAYS
CONCLUSIVE GROUNDS (CG) DECISION	PROPORTION OF CASES THAT RECEIVED +VE CG DECISION	43%	21%	42%	19%
	DAYS BETWEEN RG AND CG DECISIONS	96 DAYS	98 DAYS	47 DAYS	84 DAYS

Table 1: Decision outcomes and timeliness of pilot vs. non-pilot areas¹⁵¹

Generally, while the NRM pilot was well received a number of significant questions regarding its overall impact on the referral process in addition to the additional, and uncompensated, strain it placed on participating statutory organisations ultimately hindered its evaluation. Moreover, its impact on the quality, timeliness and suitability of the protection offered to victims as a result of the NRM were also unclear. While the time taken to make reasonable grounds decisions was ultimately reduced, some participants in the pilot questioned the purpose of the NRM conclusive decision in general – as a successful decision, at the time of the pilot only granted victims an additional 14 days of support, and no extra benefits or access to additional services.¹⁵² Though the support period has since been extended, questions still remain over the suitability of the NRM and its long-term benefit and impact for those referred through it.

¹⁵⁰ Ellis, Cooper, and Roe.

¹⁵¹ Ellis, Cooper, and Roe.

¹⁵² Ellis, Cooper, and Roe.

3.2 THE UK MODERN SLAVERY STRATEGY

In November 2014, the UK Government published the Modern Slavery Strategy. The strategy established the activities to be undertaken across the UK to address the slavery problem as a sort of ‘companion’ to the forthcoming Modern Slavery Act 2015. The groundwork for many of the issues the strategy hoped to tackle had been laid through the legislative protections and powers provisioned in the Act, and the introduction of the UK’s first Independent Anti-Slavery Commissioner (IASC).¹⁵³ It has also been acknowledged that the introduction of the Act itself played a significant role in signal boosting and raising the profile of modern slavery; particularly within law enforcement, while press coverage following the assent of the Act, and the increases in law enforcement activity in response to modern slavery have no doubt increased its prominence in the national consciousness.¹⁵⁴

The strategy itself set a number of objectives across the headings of Pursue, Protect, Prevent and Prepare, also known as the ‘4Ps’ framework. The framework is based around those established as part of the UK’s counter-terrorism strategy, CONTEST.¹⁵⁵ At the heart of some of the issues with the UK’s approach to tackling modern slavery, some argue, is the national strategy itself. The framework is built largely on the ‘pursuit’ of criminal justice, and not on victim protection, and resources for victim care and support are currently allocated at a national level, not locally based on needs or where they are considered most critical.¹⁵⁶ Moreover, the key decision-making process around clarifying the victim status of individuals is highly connected to immigration status, and responsibility is split

¹⁵³ HM Government, “Modern Slavery Strategy.”

¹⁵⁴ Haughey, “The Modern Slavery Act Review: One Year On.”

¹⁵⁵ Peter Rogers, “Contesting and Preventing Terrorism : On the Development of UK Strategic Policy on Radicalisation and Community Resilience Contesting and Preventing Terrorism : On the Development of UK Strategic Policy on Radicalisation and Community Resilience,” no. October 2013 (2011): 37–41, <https://doi.org/10.1080/18335300.2008.9686913>.

¹⁵⁶ Gardner, “An Idea Whose Time Has Come? Modern Slavery, Multiple Streams Approach and Multi-Layer Policy Implementation”; HM Government, “Modern Slavery Strategy.”

between the NCA - in the case of EU EEA nationals, and UKVI for other, non-EEA, cases.¹⁵⁷

In summary, the strategy outlines, at a high level, measures needed to ensure that: 1) more victims are identified, and that once they have been identified, are provided with effective support and protection; 2) more criminals are detected and prosecuted; 3) the future facilitation of modern slavery is prevented; and 4) fewer people are deceived or forced into exploitation.¹⁵⁸ But these provisions are focused nationally, and continue to offer little assistance, apart from generic areas of focus, to those aiming to deliver, and implement, policy at a local level.¹⁵⁹

As the previous chapter identified, many organisations contribute to anti-slavery efforts; the Police, GLAA, UKVI, and local authorities, among others. This organisation base is even broader when you consider NGOs and organisations connected to anti-slavery partnerships up-and-down the country. These organisations all have different oversight responsibilities, roles and responsibilities in operationalising the modern slavery strategy. For example, in addition to the police's obligation for law enforcement, local authorities and public health organisations have existing requirements under the Care Act, none of which are currently mapped within the modern slavery strategy.¹⁶⁰

The National Audit Office's review into the governance of the UK modern slavery strategy also identifies a number of additional issues. These focus in particular on a lack of objectives or activities designed to monitor progress. While the strategy gives a mission statement of aiming "to reduce significantly the prevalence of modern slavery in the UK", it does not provide any clarification on how this could, or should, be measured.¹⁶¹ Nor does it set targets for victim identification figures, crime recording rates or prosecutions. The same report also criticizes the Home

¹⁵⁷ Gardner, "An Idea Whose Time Has Come? Modern Slavery, Multiple Streams Approach and Multi-Layer Policy Implementation."

¹⁵⁸ HM Government, "Modern Slavery Strategy."

¹⁵⁹ Gardner, "An Idea Whose Time Has Come? Modern Slavery, Multiple Streams Approach and Multi-Layer Policy Implementation."

¹⁶⁰ National Audit Office, "Reducing Modern Slavery."

¹⁶¹ National Audit Office.

Office for not keeping track of its expenditure on measures combating modern slavery each year, and for having no central governance structure.

3.3 THE MODERN SLAVERY ACT 2015

Introduced in 2015, the UK's Modern Slavery Act was designed to consolidate existing legislation linked to modern slavery in the UK and introduced a number of changes designed to strengthen the powers of law enforcement. The act came in response to growing pressure from a range of stakeholders, including politicians, academics, NGOs and international advocacy organisations, and increased the maximum sentence for convicted traffickers and slave-masters to life imprisonment, whilst also aiming to improve the level of protections provided to victims.¹⁶²

Despite its billing as “world-leading anti-slavery legislation” by then Home Secretary Theresa May following its ascension, and its significance of as an important marker in progress towards improving response to modern slavery and the offences to which it is linked, there remain issues regarding the Modern Slavery Act's focus on prosecution as opposed to prevention and victim protection.¹⁶³ These are discussed in detail in chapter 4.

While it is not the intention of this study to provide a detailed review of the legislative environment, it does have a significant impact upon the response of law enforcement, the support offered to victims, and a general influence over the national anti-slavery infrastructure. Therefore, the following short section will detail a number of the key elements of the Act, providing the exposition needed

¹⁶² HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking”; Gary Craig, “Human Trafficking and the UK Modern Slavery Bill,” *Social Inclusion* 3, no. 1 (2015): 136–39, <https://doi.org/10.17645/si.v3i1.202>; Gary Craig, “Modern Slavery in the UK: The Contribution of Research,” *Journal of Poverty and Social Justice* 22, no. 2 (2014): 159–64, <https://doi.org/10.1332/175982714X13971194144714>.

¹⁶³ HM Government, “2017 UK Annual Report on Modern Slavery,” *Home Office*, 2017, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/652366/2017_uk_annual_report_on_modern_slavery.pdf.

to fully understand some of the practices and challenges that emerged as part of this study, and the criticisms of third parties over a number of its provisions.

3.3.1 SECTION 45: THE STATUTORY DEFENCE

One key mechanism that the Act affords to victims is the Section 45 provision. Section 45 introduces a statutory defence for all victims who commit offences under any pressure (i.e. as-a-result of coercion, deception, threat, or use of force etc.) that can be linked to slavery, trafficking or other relevant form of exploitation. These provisions are stronger still for victims under the age of 18, *“in these circumstances there is no requirement for compulsion, as it is sufficient that the illegal act should be a direct result of slavery or relevant exploitation and that a reasonable person in the same situation and having the same characteristics would have committed the offence”*.¹⁶⁴

The statutory defence is important, as Haughey’s review cited that anecdotal evidence suggested that use of the statutory defence may have increased, with law enforcement expressing concerns that the defence may be used as a loophole for regular criminal offenders to ‘pose’ as modern slavery victims in order to avoid charges. However, other anecdotal evidence in Haughey’s review appeared to show that victims continue to be prosecuted for offences they may have been forced to commit – in contrast to the claims of law enforcement agencies.¹⁶⁵

¹⁶⁴ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking.”

¹⁶⁵ Haughey, “The Modern Slavery Act Review: One Year On,” 19.

3.3.2 SECTION 52: THE DUTY TO NOTIFY

Another key provision of the Act, section 52 - known as the 'Duty to Notify', sets the statutory requirement for the notification of the Home Office by specified statutory authorities when they encounter potential victims of modern slavery. The objective of the Duty to Notify provision is to help establish a more complete picture of the true nature and scale of slavery in the UK than can be provided through NRM referral data alone. While the NRM itself fulfils part of this obligation as the Home Office are notified by default when a referral takes place, it does not capture those potential victims who do not consent to be referred. The Duty to Notify provision also requires that separate notifications are made for all adult victims who do not consent to referral.¹⁶⁶ In theory this should provide a complete picture of all potential adult victims in combination with NRM data. However, in reality the quality and consistency of the data being collected is variable, incomplete and plagued with errors and duplication.¹⁶⁷ Unlike referral through the NRM, the Duty to Notify process is anonymous, providing only contextual information about the victim; such as gender and nationality, the force area the offence was alleged to have taken place in, and the nature of the exploitation involved.

Both HMICFRS and the Haughey report cite issues related to the utilisation of the Duty to Notify provision by police. Primarily, in cases where no NRM referral was made, the chance of the provision being utilised was low.¹⁶⁸ The effectiveness of Duty to Notify is also undermined by the same challenges that undermine some elements of the victim identification process, such as a lack of awareness and understanding as to what modern slavery is and what it looks like.¹⁶⁹

¹⁶⁶ HMICFRS, "Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking," 21.

¹⁶⁷ National Audit Office, "Reducing Modern Slavery."

¹⁶⁸ Haughey, 2016)

¹⁶⁹ HMICFRS, "Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking," 11.

3.3.3 THE INDEPENDENT ANTI-SLAVERY COMMISSIONER

The Act also introduced the statutory footing and remit for the role of an Independent Anti-Slavery Commissioner (IASC) in the UK. The role of the first IASC, Kevin Hyland, was established to lead national efforts to tackle modern slavery and human trafficking, promote best practice and drive “crucial improvement” to anti-slavery response.¹⁷⁰ The role sought to address the problem of modern slavery in the UK across five key areas: 1) “improving identification of and support for victims of modern slavery”, 2) “improving the response of law enforcement and criminal justice”, 3) “understanding and promoting best practice in partnership work between statutory agencies, civil societies and the private sector”, 4) “engaging with the private sector to encourage transparency in the supply chain”, and 5) “improving international collaboration between police forces in the UK and their European and international counterparts.”¹⁷¹

Other countries that are signed up to the European Directive on ‘preventing and combating trafficking in human beings and protecting its victims’ have in place national rapporteurs that monitor the implementation of anti-trafficking measures and advise their respective governments on anti-trafficking issues. In the UK however, this role was originally fulfilled by an inter-departmental ministerial group (IDMG), but the approach was met with widespread scepticism.¹⁷² For instance, Lipscombe and Beard suggested that the appointment of a true national rapporteur could not only help to reduce costs, but could also lead to greater engagement with NGOs who may be sceptical of governmental organisations, and as a result improve engagement and increase the amount of data collected and shared around the numbers of trafficking victims in the UK.¹⁷³ Moreover, in other countries rapporteurs also act as a scrutinising force on their

¹⁷⁰ Independent Anti-Slavery Commissioner, “About the Commissioners Office,” 2018, <http://www.antislaverycommissioner.co.uk/about-the-commissioners-office/>.

¹⁷¹ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking,” 21.

¹⁷² HM Government, “First Annual Report of the Inter-Departmental Ministerial Group on Human Trafficking,” 2012, <https://www.gov.uk/government/publications/human-trafficking-inter-departmental-ministerial-group-report-2012>.

¹⁷³ Lipscombe and Beard, “Human Trafficking: UK Responses.”

respective governments, something a non-independent group such as the IDMG cannot fulfil.

Following the introduction of the Modern Slavery Act 2015 the role of IASC was established. The role essentially claimed it would provide a position, independent from government, alleged to be equivalent to that of the national rapporteurs seen elsewhere in Europe. However, despite its title and such assurances, some have questioned the true independence of the IASC, and GRETA (the Council of Europe's 'group of experts on actions against trafficking in human beings') state that the role fell 'far short' of that of a national rapporteur.¹⁷⁴

While the independence and ability of the IASC to act as a scrutinising body has been called into question, it has proven a strong support of multi-agency partnership working – producing a toolkit and guidance in collaboration with the University of Nottingham to support the formation and operation of place-based networks around the country.¹⁷⁵

3.3.4 LEGAL ASSISTANCE

The European Trafficking Directive requires that potential and presumed victims should be provided with legal assistance 'without delay'.¹⁷⁶ However, under the terms of the UK Modern Slavery Act 2015, victims were initially unable to access legal advice until after they had been referred through the NRM and a conclusive grounds decision made indicating that there are in fact conclusively found to be a victim of modern slavery.

However, some criticism of the Modern Slavery Act has cited that in many cases, potential victims are rarely in a position, or offered sufficient support to make an informed decision regarding their case prior to referral. For instance, between 2008 and 2010, a UK based NGO – Kalayaan, identified 157 potentially trafficked

¹⁷⁴ Craig, "The UK's Modern Slavery Legislation: An Early Assessment of Progress."

¹⁷⁵ University of Nottingham, "Anti-Slavery Partnerships Toolkit."

¹⁷⁶ Europe, "Council of Europe Convention on Action against Trafficking in Human Beings."

migrant domestic workers. Of those identified, 102, or ~65%, refused to be referred through the NRM.¹⁷⁷ In cases where victims originate from backgrounds or countries where referral and cooperation with authorities is not necessarily a gateway to safety - this is a potentially dangerous prospect, and one which can be seen as a barrier to their referral and subsequent successful identification as a victim when in the UK.

As a result of these criticisms, a legal challenge was made by the Anti-Trafficking and Labour Exploitation Unit (ATLEU).¹⁷⁸ Subsequently, in 2018 the government announced that it would provide legal assistance to victims with an initial successful reasonable grounds decision, meaning victims no longer had to wait for an extended period (sometimes over a year) for a conclusive grounds decision before being able to access legal aid.¹⁷⁹ Furthermore, the Modern Slavery Act 2015 currently does not guarantee victims' access to compensation. While courts are expected to consider ordering compensation for victims, they still face significant hurdles pursuing it through criminal and civil proceedings, and the criminal injuries compensation authority, meaning that few ever recover the money owed to them as a result of unpaid wages resulting from forced labour.¹⁸⁰

¹⁷⁷ Myriam Cherti and Eliza Galos, "The UK's Response to Human Trafficking: Fit for Purpose?," *Institute for Public Policy Research*, no. July (2012), https://www.ippr.org/files/images/media/files/publication/2012/07/beyondirregularity-trafficking_July2012_9382.pdf.

¹⁷⁸ Electronic Immigration Network, "Court Order Provides Clarity on Availability of Legal Aid for Victims of Trafficking and Modern Slavery," 2018, <https://www.ein.org.uk/news/high-court-order-provides-clarity-availability-legal-aid-victims-trafficking-and-modern-slavery>.

¹⁷⁹ Adam Hewitt, "UK Government Confirms Victims of Modern Slavery Entitled to Free Legal Advice," *Hope for Justice*, 2018, <http://hopeforjustice.org/news/2018/05/uk-government-confirms-victims-of-modern-slavery-entitled-to-free-legal-advice/>.

¹⁸⁰ Janice Lam and Anthony Steen, "Rights and Recourse: A Guide to Legal Remedies for Trafficked Persons in the UK," *Anti-Slavery International*, n.d., http://www.antislavery.org/includes/documents/cm_docs/2011/r/rights_and_recourse_report_final.pdf.

3.3.5 OVERSEAS DOMESTIC WORKERS

Currently, the UK implements a tiered visa that prevents overseas domestic workers from switching employers.¹⁸¹ Despite a number of lobbying groups and NGOs arguing that this creates an environment fertile for exploitative labour practices and slavery, it remains the case that of those employed under the visa, only successfully referred modern slavery victims have the legal right to switch employers. This system creates a situation where workers are effectively bound to their employers, stripping them of all power to withdraw their labour without risking the removal of their right to work - thus creating an environment that is fertile for exploitation.¹⁸² While efforts to overturn this were rejected by the House of Commons, an amendment was passed granting victims an additional year stay in the UK if they satisfy the "conclusive decision" criteria indicating that they are more likely than not a victim of human trafficking or modern slavery.¹⁸³

Domestic work, though acknowledged as an issue, is particularly clandestine and its scale is perhaps less understood than other forms of exploitation that are linked to modern slavery. In documented cases of forced and unpaid domestic work, victims rarely, if ever, leave their 'employer's' premises – never interacting with frontline public services and making it extremely unlikely that they will ever be identified as a potential victim of modern slavery.¹⁸⁴

¹⁸¹ Dwyer et al., "Forced Labour and UK Immigration Policy: Status Matters."

¹⁸² Thanos Maroukis, "Keeping Up Appearances: The British Public Policy Response to the Trafficking of Domestic Workers in a Changing Regime of Social Protection," *Journal of Immigrant and Refugee Studies* 15, no. 2 (April 3, 2017): 155–70, <https://doi.org/10.1080/15562948.2017.1304602>.

¹⁸³ The National Crime Agency, "The National Referral Mechanism."

¹⁸⁴ National Crime Agency, "Types of Modern Slavery Crime"; Virginia Mantouvalou, "'Am I Free Now?' Overseas Domestic Workers in Slavery," *Journal of Law and Society* 42, no. 3 (2015): 329–57, <https://doi.org/10.1111/j.1467-6478.2015.00714.x>.

3.3.6 SUPPLY-CHAIN TRANSPARENCY

The Modern Slavery Act 2015 requires businesses with UK operations and an annual turnover of more than £36m to publish a supply-chain transparency report. The measure was implemented in the hopes it would encourage business to identify and remove sources of forced labour and human trafficking from their supply chains.¹⁸⁵ However, under current measures there is no financial or criminal recourse for companies that identify instances of trafficking or exploitative labour, or that fail to comply with the audit requirement at all, leading some to criticize the measure as ‘toothless’ and not fit for purpose.¹⁸⁶ A National Audit Office study into the statements found that their quality varied greatly, and that there was no central list available confirming the number and identity of the organisations required to provide them.¹⁸⁷

Under the current legislation, it is hoped that the pressures of negative media attention and public opinion will be enough to encourage businesses to take appropriate measures to eradicate forced labour from their supply chains.¹⁸⁸ But, within the first year of the provision’s enactment, of the approximately 12,000 over the £36m threshold, only 75 organisations were found to have made the necessary assessments (as of March 2016); and of those 75, only 22 were compliant with the law stating that the reports must be available on the company's website, viewable by the public, and signed off by a company director.¹⁸⁹ The measures have also come in for criticism as transparency

¹⁸⁵ HM Government, “Slavery and Human Trafficking in Supply Chains: Guidance for Businesses,” *Home Office*, 2017, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf.

¹⁸⁶ Tim Wright, “Modern Slavery and Trafficking – Why Supply Chain Transparency Matters,” *Sourcing Speak*, 2018, <https://www.sourcingspeak.com/modern-slavery-trafficking-supply-chain-transparency-matters/>.

¹⁸⁷ National Audit Office, “Reducing Modern Slavery.”

¹⁸⁸ Lindsay Fortado, “Duty Comes into Force for Boards to Scrutinise Supply Chains,” *Financial Times*, 2015, <https://www.ft.com/content/4d170526-7d84-11e5-a1fe-567b37f80b64?siteedition=uk>.

¹⁸⁹ Lindsay Fortado, “Lacklustre Compliance on Anti-Slavery Law,” *Financial Times*, 2016, <https://www.ft.com/content/d8147d76-e22d-11e5-9217-6ae3733a2cd1>.

statements are not currently stored or made available through a central government repository.

In 2016 a Private Members Bill was pushing to address these concerns. The Bill aimed to address these concerns by mandating that all commercial organisations and public bodies include modern slavery statements in their annual accounts, whilst also requiring that operators who have not provided such statements are excluded from procurement processes.¹⁹⁰ Unfortunately, the bill was not moved and has since been dropped by its sponsoring MP.

Due to the potential complexity of international supply chains, the challenge of eradicating extreme forms of labour exploitation from them is no easy feat. However, this does not mean there has not been progress in the area. The Gangmasters & Labour Abuse Authority (GLAA) has taken a lead in this field, taking a sectoral approach to compliance, beginning with the construction industry and the introduction of a joint protocol in 2019.¹⁹¹

The protocol, which now has more than one hundred signatories from across the construction industry, commits organisations to work in partnership to protect vulnerable workers against all forms of labour exploitation. It encourages organisations to share information to help prevent the exploitation of workers and commits them to raise awareness of issues within their wider supply chains. Work is now being conducted by the GLAA to launch similar initiatives with both the textiles and hospitality industries.¹⁹²

Despite these steps, in an independent review, published by Frank Field MP, Maria Miller MP and Baroness Butler-Sloss in May 2019, it was identified that much work

¹⁹⁰ UK Parliament, "Modern Slavery (Transparency in Supply Chains) Bill [HL] 2016-17," 2016, <https://services.parliament.uk/bills/2016-17/modernslaverytransparencyinsupplychains.html>.

¹⁹¹ Gangmasters & Labour Abuse Authority, "Construction Protocol," 2019, <https://www.gla.gov.uk/i-am-a/i-use-workers/construction-protocol/>.

¹⁹² Gangmasters & Labour Abuse Authority, "Apparel and General Merchandise Public Private Protocol," 2019, <https://www.gla.gov.uk/i-am-a/i-use-workers/apparel-and-general-merchandise-public-private-protocol/>.

was still to be done.¹⁹³ The report made it clear that that a lack of clarity, guidance and subsequent enforcement of modern slavery supply-chain compliance was hindering the quality of those statements that did exist and meant that many were still missing entirely.

Current recommendations have suggested that the government take further steps to encourage compliance by removing the ability for businesses to comply by simply stating that they had taken no steps to address modern slavery. Recommendations further include making a number of reporting areas mandatory, and the establishment of a central government repository from where the independent anti-slavery commissioner could monitor compliance, whilst also advocating for stronger sanctions be made available through a new compliance body to punish organisations with lacklustre or missing statements.¹⁹⁴

This absence of true compliance with the supply chain transparency requirements of the Modern Slavery Act 2015 from businesses alludes to wider issues in sufficiently engaging the businesses with the anti-slavery agenda. While grass-roots efforts – in some cases facilitated through partnership work – can help raise awareness of issues, encourage responsible consumption and raise awareness of indicators, large and medium enterprise has a big role to play in the global fight on modern slavery through sustainable sourcing and production.¹⁹⁵ While it is beyond the scope of this thesis to provide recommendations on how to achieve this, it is clear that there is work still to be done to ensure thorough and diligent supply-chain auditing. This is an area where partnership working with organisations

¹⁹³ Frank Field, Maria Miller, and Baroness Butler-Sloss, "Independent Review Of The Modern Slavery Act 2015," *Secretary of State for the Home Department*, 2019, https://www.business-humanrights.org/sites/default/files/documents/Independent_review_of_the_Modern_Slavery_Act_-_final_report.pdf.

¹⁹⁴ Frank Field, Maria Miller, and Baroness Butler-Sloss, "Independent Review Of The Modern Slavery Act 2015," *Secretary of State for the Home Department*, 2019, https://www.business-humanrights.org/sites/default/files/documents/Independent_review_of_the_Modern_Slavery_Act_-_final_report.pdf.

¹⁹⁵ Stefan Gold, Alexander Trautrimis, and Zoe Trodd, "Modern Slavery Challenges to Supply Chain Management," *Supply Chain Management* 20, no. 5 (2015): 485–94, <https://doi.org/10.1108/SCM-02-2015-0046>.

such as the GLAA, and others in the anti-slavery movement, provides scope for deeper business engagement on this agenda.

3.4 SUMMARY

Key Findings:

- The UK's commitment to the anti-slavery agenda is underpinned by the introduction of the Modern Slavery Act in 2015.
- The Act contains provisions to assist prosecution – by consolidating existing legislation and establishes minimum requirements for victim support.
- Despite these measures, there are criticisms over various aspects of the Modern Slavery Act 2015, particularly around the limited amount of support it offers to victims, particularly those with precarious migration status.
- Piloted measures to improve the speed and efficiency at which decisions at which decisions around potential victims are made by the home office, results have been negligible.
- The number of referrals to the NRM has continued to rise since the Modern Slavery Act's introduction, indicating increased attention on this agenda by key actors.

This chapter has summarised and unpacked the key elements of the Modern Slavery Act 2015, the National Referral Mechanism and UK Modern Slavery Strategy, discussing some of the key challenges that continue to inhibit national efforts to prevent and investigate slavery related crime, and offer protections to identified victims. The review has shown that while the UK's modern slavery strategy adequately frames the issue, it fails to elaborate upon ways in which

victim support, criminal investigation, prosecution and prevention efforts can be measured or evaluated – despite calling for improvements in all these areas.

Nationally, steady increases are being seen in the numbers of potential victims being identified, however criticisms of the mechanism designed to support them – the NRM, and the provisions contained within it are widespread. The referral process itself continues to be questioned for its impartiality as numbers and success rates for victims from outside the EU remain low, despite recognition that these individuals represent some of the most at-risk.

The NRM itself in many cases does not offer adequate provisions to support and rehabilitate victims, despite a number of revisions which have extended the period of support available. However, recent revisions to the period of ongoing support available to victims who are conclusively identified as victims are promising and show at least some willingness to adapt support mechanisms to better fit the requirements of victims.

4 REVIEWING THE PROGRESS

In this final component of the literature review, the UK's progress since the introduction of the Modern Slavery Act 2015 in implementing the measures discussed in the previous chapter are reviewed, drawing primarily on two key sources: The Haughey Report, a review of the Modern Slavery Act 2015 one year on from its initial implementation, and *Stolen Freedom*, which contains the results of a Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) inspection into the UK's policing response to modern slavery.¹⁹⁶ Both of which are considered milestone reports in efforts to evaluate the national response. The section of the review will demonstrate how certain provisions within the Modern Slavery Act 2015, and the practices that result from it, create a number of significant challenges to efforts to effectively identify and support victims. This chapter, alongside those which precede it provide a number of contextual reference points necessary for the analysis of the project's empirical investigation.

This chapter places particular emphasis on those parties intimately involved in issues of victim identification and support. While much of the UK's official doctrine emphasises the need for 'victim focused' approaches, other reports and research have identified significant gaps in victim support provision; revealing a stark contrast between policy, and the realities of local implementation.¹⁹⁷ In addition, previous chapters have hinted at other issues connected to an absence of available resources to fund and staff anti-slavery partnerships, as current approaches are primarily unfunded and rely on the voluntary commitment of participating organisations – and often on the work of a few committed local policy entrepreneurs. Alongside this, the objectives of participating organisations are

¹⁹⁶ Haughey, "The Modern Slavery Act Review: One Year On"; HMICFRS, "Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking."

¹⁹⁷ Gardner, "An Idea Whose Time Has Come? Modern Slavery, Multiple Streams Approach and Multi-Layer Policy Implementation"; House of Commons Work and Pensions Committee, "Victims of Modern Slavery: Twelfth Report of Session 2016-2017," 2017, <https://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/inquiries/parliament-2015/victims-of-modern-slavery-16-17/>.

often divergent and further compound the complexities of coordinating efforts, particularly where there is no funding.

The following discussion demonstrates how a number of different factors currently inhibit the UK's anti-slavery effort both at the local and national levels. Nationally, gaps in intelligence recording and reporting mean that the picture is incomplete, and our understanding of the scale and nature of exploitation remain incomplete – and in some cases statistically warped. Looking locally, despite widespread efforts to raise awareness and rollout training to frontline practitioners the impact of that work remains unclear, and in others knowledge and understanding remain sparse as police forces and other statutory stakeholders fail to adequately prioritise modern slavery.

4.1 STOLEN FREEDOM AND THE HAUGHEY REPORT

The first of these publications; The Haughey Report, was commissioned, by then prime minister - Theresa May, a year after the Modern Slavery Act was enacted. The review, conducted by barrister Caroline Haughey, sought to establish the extent to which the Act, and the provisions therein, were having an impact on the national modern slavery response. It assessed whether there was sufficient awareness of the Modern Slavery Act's criminal justice measures among practitioners, the quality at which the measures were being implemented, gaps in its provisions, and whether any concrete recommendations could be established to address them.¹⁹⁸

Overall, the report established limitations in four key areas. Firstly, the level of training available to police officers, investigators and prosecutors was cited as “patchy” and in some cases completely non-existent. Second, the levels of intelligence available regarding the nature and scale of modern slavery at all levels (international, national and regional) were identified as a significant hindrance to the operational response of police. The structure and consistency taken by

¹⁹⁸ Haughey, “The Modern Slavery Act Review: One Year On.”

agencies to ‘identify, investigate, prosecute and prevent’ modern slavery was also criticized, including a lack of review and lessons-learned processes within agencies. Finally, the report cites concerns over the failings to provide some complainants (victims) with appropriate witness protections during and after the judicial process.¹⁹⁹ In response to these issues, the Haughey report cites twenty-nine recommendations across six categories; Consistent and Coordinated Police Response, Training and Continuous Improvement, Better Recording and Investigation of Offences, Processing of Court Cases, Referrals and Victim Support, and Policy Considerations.²⁰⁰ These recommendations are summarised in subsequent sections of this chapter.

The second of these reports, ‘Stolen Freedom’ is the result of the 2017 HMICFRS inspection into policing responses to combat human trafficking and modern slavery.²⁰¹ The report, as a result of the inspection it is built upon, reviews the efforts of UK law enforcement, including the National Crime Agency (NCA), in responding to modern slavery, including their use of the powers provisioned in the 2015 Modern Slavery Act.²⁰²

The Stolen Freedom report concludes that, despite evidence of “growing impetus”, both regionally and nationally to improve the response, many victims continue to receive a service that is “wholly inadequate”.²⁰³ The nature of these deficiencies and their reasons are discussed in detail below. Overall, a number of inspected forces were found to have flagged modern slavery as a strategic priority. Despite this, many were yet to translate this into coherent and consistent operational practice, and most did not yet have any way to appropriately measure success. However, a number of forces inspected also expressed a reluctance to ‘turn over the stone’ and proactively seek out modern slavery offences.²⁰⁴

¹⁹⁹ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking,” 23–24.

²⁰⁰ Haughey, “The Modern Slavery Act Review: One Year On.”

²⁰¹ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking.”

²⁰² HMICFRS.

²⁰³ HMICFRS.

²⁰⁴ HMICFRS, 10.

While the modern slavery strategy serves as an umbrella for national anti-slavery efforts, the Home Office does not provide a clear indicator of what, in its view, success looks like. The NCA and Home Office modern slavery unit both collect and collate various statistics; including potential victims identified, numbers of recorded crimes, operations, prosecutions, convictions etc., but neither they nor the home office establish clear targets.

4.2 THE CHALLENGES

4.2.1 VICTIM PROTECTION AND SUPPORT

NGOs that work directly with victims have heavily criticized the Act for underpinning systematic failures in the government's duty to protect and support victims after they have been identified.²⁰⁵ The House of Commons Work and Pensions Committee has also cited failings in the Act's ability to provide an adequate pathway for victim recovery due to the limited scope and period of support offered under the NRM. Under new revisions, the support period offered to confirmed victims is calculated using a needs-basis, while under previous iterations of the NRM confirmed victims were only entitled to a minimum of 45- and 14-days of ongoing support.²⁰⁶ Despite the iterative improvement in support being offered, a new private members bill, currently being discussed in the House of Commons, seeks to extend the period of victim care to a minimum of twelve months after a successful referral.²⁰⁷ NGOs have also called for additional provisions that would see victims given a full year's leave to remain in the UK in order to reduce the risk of destitution, and further trafficking and exploitation.²⁰⁸

²⁰⁵ House of Commons Work and Pensions Committee, "Victims of Modern Slavery: Twelfth Report of Session 2016-2017."

²⁰⁶ Samantha Ferrell-Schweppenstedde, "Day 46," *Human Trafficking Foundation*, 2016, <https://snowdropproject.co.uk/wp-content/uploads/2018/02/Day-46.pdf>.

²⁰⁷ Lord McColl of Dulwich, "Modern Slavery (Victim Support) Bill."

²⁰⁸ Kate Roberts, "Life after Trafficking: A Gap in the UK's Modern Slavery Efforts," *Anti-Trafficking Review*, no. 10 (2018): 164–68, <https://doi.org/10.14197>.

However, proposals to extend the minimum length of care have been received with scepticism by the government who cite concerns over the potential for such a measure to be abused by those seeking to claim asylum in the UK unlawfully, the result of which would create an incentive for individuals to pose as slavery victims in order to receive legal leave to remain.²⁰⁹ However, without legal residence in the UK, and an extended period of necessary support, including the ability to access justice, compensation, healthcare, welfare and education services, victims remain at significant risk of re-trafficking and further exploitation post referral.²¹⁰

4.2.1.1 VICTIM IDENTIFICATION

The difficulties associated with victim identification and referral are compounded by a number of issues. As a result of this, victims continue to remain unidentified, unprotected, and hidden from society. Even in circumstances where victims have a degree of ‘freedom’ in their daily activities, such as in leaving their residence or places of work, they often remain reluctant to seek help. Moreover, in instances where victims are identified they are often not given, or even made aware of the full safeguards and protections that they should, and are entitled to, receive.²¹¹

The reasons for this are numerous and often complex: in some cases victims live under the constant threat of violence, in others they live in fear that should they fail to comply with the wills of their trafficker or exploiter - their families will be subjected to violence.²¹² Others, particularly those with precarious immigration status or working under the tier 5 visa system fear deportation from the

²⁰⁹ Frank Field, “Protection for Victims of Modern Slavery,” *Letter from Frank Field MP, Chair of the Work and Pensions Select Committee to Theresa May, UK Prime Minister, 2017*, <https://www.parliament.uk/documents/commons-committees/work-and-pensions/Correspondence/Letter-from-the-Chair-to-the-Prime-Minister-relating-to-modern-slavery-13-December-2017.pdf>.

²¹⁰ Roberts, “Life after Trafficking: A Gap in the UK’s Modern Slavery Efforts.”

²¹¹ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking,” 11.

²¹² Kevin Bales, Olivia Hesketh, and Bernard Silverman, “Modern Slavery in the UK: How Many Victims?,” *Significance* 12, no. 3 (2015): 16–21, <https://doi.org/10.1111/j.1740-9713.2015.00824.x>.

country.²¹³ Sometimes trafficked victims perceive that their current circumstances, particularly when considering exploitative labour, are favourable to those they would receive in their home countries should they face deportation. While in other cases myths about the actions of authorities and the police based on stories told by their exploiters, or based on experiences in their home countries, may prevent them from seeking help in the UK.²¹⁴ Victims may not even realise they are, in fact, victims, or may exhibit loyalty to, or emotional dependence on their exploiters. In other instances, cultural and language barriers can also create an additional sense of isolation and helplessness.²¹⁵

Issues such as these set modern slavery apart from many other forms of crime and compound the challenges faced by frontline workers and legal first responders in identifying potential victims, and in making initial referrals to the NRM. To improve on this, HMICFRS singled out the need for increased awareness and understanding.²¹⁶ It has been identified that, often, awareness and understanding is over-reliant on individual experience and exposure. Research has indicated that frontline staff involved in dealing with slavery cases, of which there are a growing number, do build up demonstrable expertise and experience in the field. Many of these also exhibit willingness to share and to continue to develop. But all too often this is done so on a tacit, and informal, basis, without institutional support or professional recognition, and as such can be undervalued.²¹⁷ Subsequently organisational memory is lacking, and organisations risk losing this knowledge when personnel change roles or leave the organisation entirely.

‘Significant failings’ have also been identified related to the ability of police to successfully identify victims of modern slavery, and in their ability to take appropriate action to review cases involving individuals who “were and should

²¹³ Mantouvalou, “‘Am I Free Now?’ Overseas Domestic Workers in Slavery.”

²¹⁴ Ronald Weitzer, “Human Trafficking and Contemporary Slavery,” *Annual Review of Sociology* 41 (2015): 223–42, <https://doi.org/10.1146/annurev-soc-073014-112506>.

²¹⁵ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking.”

²¹⁶ HMICFRS.

²¹⁷ Haughey, “The Modern Slavery Act Review: One Year On.”

have been” identified as victims.²¹⁸ These issues seem generally to be underpinned by a gap in the ability of frontline staff to correctly recognise and identify indicators of modern slavery. In cases where victims have been identified it is also reported that staff were not aware of their responsibility to explain the support that was available to them. And in a number of forces it was reported that frontline officers did not “feel comfortable” raising modern slavery issues, limiting the amount of intelligence throughput from engaging locally and ensuring that victims continue to be missed. In extreme cases, frontline officers maintained that modern slavery was simply not an issue in their local area.²¹⁹ Moreover, it’s been recognised by the Home Office and the NCA that NRM data is not always being used, and sometimes not appropriately detailed enough to build understanding of victim profiles, compounding gaps in the national knowledgebase and hindering service improvement, contributing to the unknown ‘dark number’ of modern slavery victims that continue to go undiscovered.²²⁰

These issues culminate in the continuing trend of low quantities of NRM referrals. In all, there is no clear increasing trend in the number of referrals made by the vast majority of forces between 2014 and 2016, with similar trends also evident in reference to their application of the Duty to Notify provision.²²¹ The ability of those working on the frontline to identify potential signals and indicators of trafficking is acknowledged to be heavily reliant on their having a thorough understanding of the potential scope, diversity and impacts modern slavery can have on victims.²²² The report also identified many frontline-contact and control room staff were not confident in recognising accurately the signs of modern slavery. As a result of a lack of effective training, there was observed a lack of

²¹⁸ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking,” 11.

²¹⁹ HMICFRS, 11.

²²⁰ National Audit Office, “Reducing Modern Slavery.”

²²¹ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking,” 11.

²²² HMICFRS, 41.

awareness on where to find guidance, and inconsistencies in the IT systems used to flag and highlight vulnerability or the threat posed by modern slavery.²²³

Other studies have also cited additional issues associated with victim identification. Research conducted by HMICFRS highlighted severe problems regarding the veracity of measures to identify victims at airport border crossing points.²²⁴ Evidence identified in the study suggested that the identification of victims was heavily reliant on targeted operations due to a lack of general resource and an undeveloped intelligence picture of the routes taken by victims entering the UK. This reinforces acknowledged data sharing problems that result in national information not being shared in a timely fashion with local forces, further contributing to a general lack of understanding of the local existence of slavery, compounded by a lack of resource to help individual forces develop their own local intelligence pictures.²²⁵

The issue of general awareness also goes beyond the Police. Nationally, the training available to frontline workers in the National Health Service (NHS) has also been deemed patchy and inconsistent. Thompson et al. found that only one-in-five trusts provided dedicated online training to workers, underpinning a general lack of confidence and knowledge to adequately recognise the signs of modern slavery and refer victims, and mirroring trends observed within the police.²²⁶ The DWP have also reported similar problems in terms of staff being unaware of modern slavery generally. While in instances where there was a core understanding, staff remarked that they had little knowledge on how to deal appropriately with identified victims.²²⁷

²²³ HMICFRS, 41.

²²⁴ Jennifer K. Lynch and Katerina Hadjimatheou, "Acting in Isolation: Safeguarding and Anti-Trafficking Officers' Evidence and Intelligence Practices at the Border," *Anti-Trafficking Review*, no. 8 (2017): 70–89, <https://doi.org/10.14197/atr.20121785>.

²²⁵ HMICFRS, "Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking," 38.

²²⁶ Thompson, Mahay, Stuckler, & Steele (2017)

²²⁷ House of Commons Work and Pensions Committee, "Victims of Modern Slavery: Twelfth Report of Session 2016-2017."

Despite national prioritisation and fairly sustained efforts to raise the profile of modern slavery, evidence gleaned through the HMICFRS inspection indicated that this was not always well reflected within individual police forces. As the report uncovered that staff and officers were frequently unaware as to whether modern slavery had been established as priority within force.²²⁸ The following excerpt from the Stolen Freedom report sums up many of the ongoing issues that continue to undermine identification efforts nationally.

“Too much police work in this area is reactive, showing little understanding of the nature and scale of modern slavery and human trafficking. It was disappointing to find that some frontline officers did not consider modern slavery to be an issue in their force area. We were also concerned to encounter some neighbourhood officers who said that they avoided raising the issue of modern slavery and human trafficking with local communities because they did not believe the public were either interested in or sympathetic to victims of these crimes. Police forces must engage better, both internally with their own staff and externally with their local communities, to improve awareness and understanding of these abhorrent crimes”.²²⁹

ECPAT (End Child Prostitution and Trafficking), a coalition of UK charities, has also suggested that increased training and more rigorous monitoring of first responders would significantly improve the effectiveness of victim identification, particularly in relation to children.²³⁰ A point also identified by scholars such as Brysk.²³¹

²²⁸ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking.”

²²⁹ HMICFRS, 6.

²³⁰ Christine Beddoe, “Missing Out: A Study of Child Trafficking in the North-West, North-East and West Midlands,” *End Child Prostitution, Child Pornography and the Trafficking of Children for Sexual Purposes UK*, no. January (2007), <https://www.ecpat.org.uk/Handlers/Download.ashx?IDMF=702119f3-8136-4b96-bfe0-008eeffd75ba>.

²³¹ Alison Brysk, “Sex as Slavery? Understanding Private Wrongs,” *Human Rights Review* 12, no. 3 (2011): 259–70, <https://doi.org/10.1007/s12142-010-0182-7>.

4.2.1.2 VICTIM REFERRAL & SUPPORT

The current care provisions offered to victims within the NRM process include a range of outreach services in addition to accommodation. Support such as subsistence, emergency medical treatment, criminal proceedings assistance, and translation and interpretation services are all made available to victims while they are within the mechanism.²³² The number of potential victims receiving care from the Salvation Army, as part of its contract with the Home Office, has increased year-on-year since it was first awarded. In the first seven months of 2017 more than 2,589 people were in receipt of Salvation Army Support.²³³

But resourcing remains a key issue in this area. Currently, on average, victims receive 251 days of support – much longer than the 45+14, and later 45+45 days originally offered as a legal minimum by the NRM, meaning that the Salvation Army reported that they and their subcontractors were finding it increasingly necessary to subsidise this from other income streams.²³⁴ On a positive note, however, the National Audit Office review found that victims were generally positive about the level of support and care they received while awaiting their conclusive grounds decision.²³⁵ Despite this encouraging news, the Home Office has been criticized for not employing a rigorous inspection and monitoring regime on the Salvation Army and its contractors around victim care. And as a result, it has no methodical way of monitoring the quality of care being provided, and no information on what happens to victims once they exit support.²³⁶

Haughey's report also recommended that steps need be taken to improve the engagement of NGO organisations with the NRM process, including mechanisms to mandate bodies who receive public funding to disclose investigation relevant materials to the police.²³⁷ Beyond this, the report also suggested that the roles of

²³² National Audit Office, "Reducing Modern Slavery."

²³³ National Audit Office.

²³⁴ National Audit Office.

²³⁵ National Audit Office.

²³⁶ National Audit Office.

²³⁷ Haughey, "The Modern Slavery Act Review: One Year On."

other statutory organisations, such as local authorities, should be clarified in order to ensure that their responsibilities to victims, outside of the NRM, are clear.²³⁸ The final victim support recommendation from that report targeted training, and the need to ensure that all police Single Points of Contact (SPOCs) were aware of the circumstances where it is appropriate to apply for an extension to the 45 days rest and recovery period provisioned by the NRM; underpinning general concerns over the widespread understanding of the NRM process and its provisions.²³⁹

In fact, Haughey's findings are quite damning of the national protection infrastructure for victims generally, stating that they are "let down" at every stage of the safeguarding process, from identification right through the recovery and rehabilitation processes.²⁴⁰ While the Stolen Freedom report, resulting from the inspection of all 43 UK police forces identified the following concerns associated with the initial identification of victims:

"... the inspection found that the identification of victims is inconsistent, sometimes ineffective, and in need of urgent and significant improvement. Victims who come into contact with the police are not always recognised as such and therefore remain in the hands of those who are exploiting them. Others are arrested as offenders or illegal immigrants. While law enforcement has a duty to refer individuals to immigration and enforcement, the vulnerability of victims must be considered in parallel."

²⁴¹

The protection and support of victims is also inhibited by the tendency to refer 'non-EU' victims, that is victims without legal status in the UK, to immigration authorities, without sufficient, and in some cases, any, consideration of modern slavery.²⁴² A clause within the UK's NRM sets out that the duty to safeguard and

²³⁸ Haughey.

²³⁹ National Audit Office, "Reducing Modern Slavery."

²⁴⁰ Haughey, "The Modern Slavery Act Review: One Year On."

²⁴¹ HMICFRS, "Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking," 5.

²⁴² HMICFRS, 13.

ensure the wellbeing of victims should supersede any concerns over an individual's immigration status.²⁴³ Despite this, relationships between UK Visas and Immigration (UKVI), and other organisations remains somewhat problematic. While UKVI itself rolled out training in 2012 to officers regarding their duty to protect, trafficking remains a peripheral concern of UKVI, whose primary remit is the enforcement of immigration law.²⁴⁴ This disparity has obvious ramifications, potentially misbalancing the requirement to enforce immigration law whilst still taking every reasonable measure to ensure potential victims are identified and supported.²⁴⁵

Earlier reviews of the NRM which took place in 2014 found that Home Office Visas and Immigration (UKVI) returned around twenty percent less successful decisions than the UK Human Trafficking Centre (UKHTC). While the UKHTC primarily deals with referrals from police, commonly featuring EU-nationals as victims, non-European Union/ European Economic Area (EU/EEA) victims are more likely to be referred through UKVI, indicating a worrying trend that may be preventing non-EU/EEA victims from being successfully identified, referred and safeguarded.²⁴⁶

Research by Van Dyke has also exposed issues in the conflicting cultures and objectives of partnering organisations in relation to victim identification and referral process.²⁴⁷ The research remarks that immigration authorities' focus on

²⁴³ Department for Education, "Safeguarding Children Who May Have Been Trafficked: Practice Guidance," 2011, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/177033/DFE-00084-2011.pdf.

²⁴⁴ UK Visas and Immigration, "About Us," 2018, <https://www.gov.uk/government/organisations/uk-visas-and-immigration>.

²⁴⁵ Jenny J. Pearce, Patricia Hynes, and Silvie Bovarnick, *Trafficked Young People: Breaking the Wall of Silence* (Routledge, 2013), <https://doi.org/10.4324/9780203074947>.

²⁴⁶ Christine Beddoe, "The National Referral Mechanism: A Five-Year Review," *The Anti Trafficking Monitoring Group*, 2014, <http://webarchive.nationalarchives.gov.uk/20141202113524/https://nrm.homeoffice.gov.uk/wp-content/uploads/2014/08/ATMG.pdf>.

²⁴⁷ Ruth van Dyke, "Partnership Working to Tackle Human Trafficking: Report 3: How the Human Trafficking Unit of the Metropolitan Police Service Has Engaged in a Wide Range of Collaborations in Order to Undertake the Three P's of Human Trafficking," *National College of Policing: The Police Online Knowledge Area*, 2014, <https://polka.pnn.police.uk/>.

immigration status could hamper the willingness of potential victims to cooperate, share information and seek help. Similar challenges have also been seen elsewhere. Most notably, local authority attempts to join up the operations of child services and youth-offending services in the UK have highlighted the possible dichotomy between the objectives of criminal justice and child protection.²⁴⁸

Returning to the central issue of slavery, other alarming issues have also been identified. In research conducted by Harvey, Hornsby and Sattar one law enforcement respondent expressed the opinion that they thought UKVI saw the NRM as a tool to deport, rather than support, potential victims. This highlights that although many positive steps were being taken, shared understanding and shared objectives are still far from ubiquitous across organisations.²⁴⁹ As a result, this sub-set of victims rarely have any awareness or understanding of the services available to help and, if these accounts are correct, little chance of accessing those services, reflecting broader issues associated with a lack of sufficient focus on victims. But this is not the only issue. An inquiry by the DWP deemed that one, of many, reasons for the low levels of prosecutions against individuals who perpetrate modern slavery was that victims are not sufficiently supported to give evidence against them.²⁵⁰

²⁴⁸ Youth Justice Review Board, *Building on Success, Youth Justice Board Review 2001 / 2002* (London: Youth Justice Board, 2002); Jackie H. Harvey, Rob A. Hornsby, and Zeibeda Sattar, "Disjointed Service: An English Case Study of Multi-Agency Provision in Tackling Child Trafficking," *British Journal of Criminology* 55, no. 3 (2015): 494–513, <https://doi.org/10.1093/bjc/azu115>; Craig et al., "Contemporary Slavery in the UK."

²⁴⁹ Harvey, Hornsby, and Sattar, "Disjointed Service: An English Case Study of Multi-Agency Provision in Tackling Child Trafficking."

²⁵⁰ House of Commons Work and Pensions Committee, "Victims of Modern Slavery: Twelfth Report of Session 2016-2017."

4.2.2 INVESTIGATING CRIME

While the primary focus of the work presented in this thesis is focused on measures to identify, support and recover modern slavery victims, it is impossible to ignore the criminal justice aspects of the policing response to modern slavery entirely; especially when there are such clear linkages between certain aspects of investigation and the ability to identify and safeguard victims.

In this regard, significant concerns have been identified. HMICFRS found that it was not uncommon for modern slavery cases to be prematurely closed, with lines of enquiry remaining open; where victims and witnesses go without ever being interviewed by police.²⁵¹ High levels of disparity have been found between forces that have dedicated resource and specialist teams to focus on modern slavery investigations in comparison to those that do not. With the former, many areas demonstrating high levels of knowledge and expertise in managing such cases. In those areas that signposted ongoing resourcing issues, especially related to large and complex investigations, or where modern slavery was not necessarily valued as a strategic priority - a number of challenges were identified as a result.²⁵²

“In many of the forces we inspected, we found substantial problems with the way investigations were handled when they were managed at lower levels, without the formal oversight that is afforded major investigations. In one force, we reviewed seven cases and found all but one to be ineffective. Four of these had been finalised prematurely when lines of enquiry remained outstanding. In another force, we found the standard of investigation was so poor that in seven out of ten cases reviewed that we referred them back to the force for further consideration. As a result, this force launched an immediate review of the quality of its modern slavery and human trafficking cases”.²⁵³

²⁵¹ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking,” 5–6.

²⁵² HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking.”

²⁵³ HMICFRS, 13.

In many cases NRM referrals still do not trigger police investigations. However, the success of NRM referrals should not preclude criminal investigation, despite the fact that many victims may choose not to engage with the criminal justice process or consent to referral through the NRM. Therefore, it is logical that in instances where the Home Office is notified of a potential victim through the duty to notify provision, an initial police investigation should be opened.

While it may introduce additional difficulties in identifying enough evidence to secure a prosecution without victim testimony, it remains important that the police undertake these investigations to ensure the protection of other potential victims from criminals, and the actions of NGOs, as vital organisations in the identification and support of victims, should not undermine or introduce additional challenges to the criminal justice system by not completing the statutory Duty to Notify.²⁵⁴ In fact, a recurring theme throughout work in the area establishes the need to completely decouple, conceptually at least, the processes of victim referral and safeguarding, and criminal investigation. Neither should be a dependant precursor for the success, or otherwise, of the other, a point reinforced by the findings of the Stolen Freedom report.²⁵⁵

Prosecution rates have also suffered historically as a result of low awareness and understanding. While CPS have rolled out training to staff to ensure knowledge of victimology and legislation - particularly, the Modern Slavery Act, Haughey reported that the police stated that working on modern slavery cases with CPS remained a “joint learning experience” as they worked together to find innovative ways of ensuring evidence was obtained and charges considered.²⁵⁶ Despite this, Haughey’s report also indicated that cases where either, or both investigator and prosecutor did not have sufficient prerequisite knowledge of the law, cases were likely to be poorly represented in court – highlighting the need for further work.²⁵⁷

²⁵⁴ Haughey, “The Modern Slavery Act Review: One Year On.”

²⁵⁵ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking.”

²⁵⁶ Haughey, “The Modern Slavery Act Review: One Year On,” 20.

²⁵⁷ Haughey, “The Modern Slavery Act Review: One Year On.”

Haughey also recommended that all forces should appoint central Single Points of Contact (SPOCs) at both strategic and tactical levels. This was in order to ensure the “effective collection, sharing, exploitation and dissemination of intelligence” among police and partners, the implementation of national strategy, and to provide a central force contact for all cases of modern slavery referred to police.²⁵⁸ The same report also identified that once appointed SPOCs should form the basis of a national Community of Practice around modern slavery, “sharing intelligence, good practice and lessons learned” and ensuring a more coherent and consistent national response.²⁵⁹

In addition to the aforementioned challenges of victim identification, Haughey also advocated for the establishment of a number of changes in the NRM process; particularly in relation to the sharing of information with police.²⁶⁰ In her recommendation, all referrals, regardless of positive decision, should be referred to police who themselves should subsequently consider investigation and prosecution; regardless of the success of the NRM decision and whether victims themselves agree to engage with the criminal justice system.

In response to these challenges connected with prosecuting offenders, some areas have taken to using approaches which target the reduction of derived demand.²⁶¹ Derived demand, as defined by Aronowitz and Koning, is the process of using strategies that indirectly disrupt those who directly perpetrate trafficking and slavery offences.²⁶² By targeting those that provide things such as accommodation, transport or money laundering services that support slavery, authorities can an environment that is challenging to operate in. These activities

²⁵⁸ Haughey, 4–5.

²⁵⁹ Haughey, 4–5.

²⁶⁰ Haughey, “The Modern Slavery Act Review: One Year On.”

²⁶¹ Ruth van Dyke, “Thinking Outside the Box: Developing Multi-Agency and Multidisciplinary Partnerships to Tackle Modern Slavery in England,” *The European Review of Organised Crime* 4, no. 2 (2017): 53–82.

²⁶² Alexis Aronowitz and A Koning, “Understanding Human Trafficking as a Market System : Addressing the Demand Side of Trafficking for Sexual Exploitation,” *International Review of Penal Law* 85, no. 3 (2014): 669–96, <https://www.cairn.info/revue-internationale-de-droit-penal-2014-3-page-669.htm>.

can also be conducted in partnership with the fire service, GLAA the HSE, HMRC, and others to close down premises for issues over occupancy, failing to comply with fire and health and safety regulations, and for suspicious or fraudulent financial activity.²⁶³

4.2.2.1 BETTER RECORDING AND INVESTIGATION OF OFFENCES

Further recommendations focus on the production and dissemination of guidance on crime recording to ensure cases containing exploitation or trafficking offences are correctly marked as such. The recommendations in particular focus on the use of uniform process to “collect and synthesise” data and intelligence from partnership arrangements.²⁶⁴ The recommendations go further, and advocate to ensure that only officers trained to deal with vulnerable witnesses take statements from complainants in modern slavery cases, and that a uniform process is applied to ensure all necessary evidence is elicited.²⁶⁵ Challenges associated with recording specifically are mediated to some extent by the actions of the Crown Prosecution Service (CPS) who now flag associated offending, which is recognised in their statistics, and cases that have an element of exploitation or trafficking are categorised alongside those charged with offences under the Modern Slavery Act.²⁶⁶ The issue of data recording is acknowledged to be complex, and challenges still remain. The range of offences and types of linked exploitation are broad, and victims are often reluctant to describe their experiences with the police meaning that initially capturing and identifying the crime itself in the first

²⁶³ Local Government Association, “Tackling Serious and Organised Crime ; a Local Response,” 2015, <https://www.local.gov.uk/sites/default/files/documents/tackling-serious-and-orga-44a.pdf>; Local Government Association, “Public Needs Greater Awareness of Modern Slavery, Say Councils and Fire Authorities,” *Local Government Association*, 2017, [https://www.local.gov.uk/sites/default/files/documents/22.12 Modern slavery_WEB.pdf](https://www.local.gov.uk/sites/default/files/documents/22.12%20Modern%20slavery_WEB.pdf); van Dyke, “Thinking Outside the Box: Developing Multi-Agency and Multidisciplinary Partnerships to Tackle Modern Slavery in England.”

²⁶⁴ Haughey, “The Modern Slavery Act Review: One Year On,” 6.

²⁶⁵ Haughey, “The Modern Slavery Act Review: One Year On.”

²⁶⁶ Haughey.

instance remains problematic.²⁶⁷ These reviews are reflected by the results of the enquiry by the Department of Work and Pensions (DWP) which found collection and recording of data on victims to be unacceptable.²⁶⁸

The IASC has highlighted significant issues with the quantity of crimes being recorded, signposting huge disparities between crimes and the number of NRM referrals made:

"Of the 3,200 referrals into the NRM (last year), that only translated into 884 crime reports by policing. There is a one in four chance of an investigation. [...] and when I say 'investigated', I mean even being recorded as a potential investigation. I know the numbers are not equal, but if there were 4,000 rapes in the UK and only one in four was ever recorded by the police, again, it would be an outcry".²⁶⁹

Of those crimes that are being recorded, many forces continue to record high proportions of offences under existing legislation, such as the Asylum and Immigration Act 2014 and the Gangmasters Licencing Act 2004, rather than the Modern Slavery Act - meaning that cases of Modern slavery are not being captured as such; and as a result it is not possible to estimate with any degree of accuracy the scale and nature of Modern slavery in the UK based on this information.²⁷⁰

²⁶⁷ Independent Anti-Slavery Commissioner, "Annual Report 2016-2017," 2017, http://www.antislaverycommissioner.co.uk/media/1164/iasc_annual-report-16-17-web.pdf.

²⁶⁸ House of Commons Work and Pensions Committee, "Victims of Modern Slavery: Twelfth Report of Session 2016-2017."

²⁶⁹ House of Commons Work and Pensions Committee.

²⁷⁰ HMICFRS, "Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking."

4.2.2.2 PROCESSING OF COURT CASES

While general concerns surround the number and quality of criminal investigations a number of positive outcomes have nonetheless been highlighted. In particular, larger investigations where modern slavery was managed through forces' existing serious and organised crime infrastructure and partnership agreements have been singled out for their ability to "disrupt or dismantle the criminal networks facilitating modern slavery and human trafficking, as well as ensuring victims were safeguarded."²⁷¹

However, limitations in the understanding of police forces, including non-specialist officers and other staff have surrounding the powers and provisions established as part of the Act have been identified. In particular, the inspection by HMICFRS concluded that investigators have limited awareness of the 'section 45' defence - which delineates that a person cannot be found guilty of a criminal offence if it is deemed they are being coerced or compelled to commit the act because of reasons that constitute slavery.²⁷² The report also supports findings of the Independent Anti-Slavery Commissioner's annual report related to widespread issues with the extent to which modern slavery crimes are recorded and investigated in general, including their ability to comply with existing crime recording standards.²⁷³ Such issues can be linked to problems with the way in which incidents were deemed to be handled at lower levels, and the lack of oversight afforded to major investigations.

To mitigate against many of these issues moving forward, Haughey outlined a raft of recommendations to improve the processing of court orders.²⁷⁴ These include items such as ensuring that all victims of modern slavery are treated as vulnerable individuals and ensuring that they receive adequate protections throughout the

²⁷¹ HMICFRS, 12.

²⁷² HMICFRS, 9.

²⁷³ Independent Anti-Slavery Commissioner, "Annual Report 2016-2017."

²⁷⁴ Haughey, "The Modern Slavery Act Review: One Year On."

judicial process, and updating process and guidance associated with the judicial system to fully reflect the provisions and changes made as part of the Act.

4.2.3 INFORMATION SHARING AND COORDINATION

Another key area identified where significant improvement is needed related to the sharing and coordination of information between agencies. The first of these issues relates to the National Crime Agency (NCA). The HMICFRS inspection identified the need for the NCA to be more “consistent and timely” in the way it distributes information and intelligence with other police forces. The report noted that current practices inhibited police from responding effectively, and in a timely manner, to issues surrounding potential victims identified in their areas. While also signalling that general levels of coordination between force boundaries need to be developed in response to the fluid and cross-border nature of some forms of exploitation.²⁷⁵

HMICFRS also highlights issues associated with the level of information sharing across geographic lines and between the police and partners.²⁷⁶ Within it, large disparities across forces are cited, often within the same geographic region, related to the formalisation of communication channels with neighbouring regions, resulting in missed opportunities and gaps in the intelligence picture.

Despite encouragement at recent changes within the NCA’s role in “leading, supporting and coordinating” the national response, including the development and maintenance of the national threat picture, forces generally demonstrated limited understanding of how the NCA’s revised accountability and governance structures, introduced in November 2016, were (and would) directly contribute to regional efforts.²⁷⁷ This comes despite the widely acknowledged notion that the “national intelligence picture for modern slavery and human trafficking is

²⁷⁵ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking,” 6.

²⁷⁶ Haughey, “The Modern Slavery Act Review: One Year On.”

²⁷⁷ Haughey, 9.

underdeveloped”, investigations regularly continue to be delayed as a result of poor levels of information sharing across policing.²⁷⁸ As a result, the report establishes the need for the NCA to take a more active role, and responsibility, in using the actionable intelligence stored within the NRM to better inform policing using information about locations of interest and known offending patterns.

Improving the understanding of modern slavery in a broader sense requires an accurate intelligence picture to establish the true nature, scale and modus operandi of the problem in a given area. Much of the intelligence available to construct this picture comes through the NRM and Duty to Notify provisions. However, the findings of HMICFRS found significant issues with the way in which this information was processed by the NCA, citing concerns that information had not be reviewed effectively and intelligence such as trafficking routes, offending patterns and locations of interest were not being extracted, subsequently analysed, and disseminated across forces.²⁷⁹ Furthermore, the report also cited significant concerns with the time taken to disseminate information on NRM referrals made by non-policing organisations, the upshot being that police are not made aware of modern slavery incidents in their respective areas. However, it should be noted that, at the time of the report, the NCA was trialling a new process to ensure the dissemination of information about new NRM referrals to forces in a more “prompt and systematic manner”.²⁸⁰ Currently however, there is no information available regarding the impact of that pilot. Regionally, the results of the same inspection indicate more positive activity, with the actions of ROCUs in the formation of regional threat groups and ROCU analysts seen to be proactive in improving the picture of regional issues.²⁸¹

Locally however, despite increasing appreciation of, and emphasis on, vulnerability in serious and organised crime operations focused on Child Sexual Exploitation (CSE), the same focus was not given to modern slavery. The report

²⁷⁸ Haughey, 9–10.

²⁷⁹ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking.”

²⁸⁰ HMICFRS, 36.

²⁸¹ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking.”

also highlighted that few forces had a strong understanding of the scale and nature of modern slavery in their area, or a concrete plan of how to collect the intelligence necessary to build it, underpinning a general theme of reactivity in the approaches employed and an over-reliance on the national picture, which does not take into account local contextual differences, such as rurality, which impact on the type of crime taking place.²⁸²

4.2.4 PARTNERSHIPS IN PRACTICE

Building on the widely acknowledged issue that the full scale and nature of modern slavery is not understood, the inspection identified issues surrounding the level of engagement of police with partnership networks towards establishing a “thorough understanding of the high-risk locations or industries in their local areas, which may be different from the national picture.”²⁸³ This is perhaps compounded by criticisms of the NRM and its failure to provide accurate information regarding known victims.²⁸⁴ Instead, the report found that generally speaking, although forces were effective in engaging with partners in response to nationally identified campaigns against industries known to use enslaved and trafficked labour, little was being done in a proactive sense to build a local picture of high-risk locations, industries and other modus operandi that may differ from the national picture.²⁸⁵

However, the picture is far from an entirely negative one. Research by Van Dyke into two co-located multi-agency partnerships in Greater Manchester and Peterborough highlighted a number of promising and, in some cases, innovative

²⁸² HMICFRS.

²⁸³ Haughey, “The Modern Slavery Act Review: One Year On,” 10.

²⁸⁴ Myriam Cherti and B Balaram, “Returning Irregular Migrants: Is Deportation the UK’s Only Option?,” *Institute for Public Policy Research*, no. February (2013), <https://www.ippr.org/publications/returning-irregular-migrants-is-deportation-the-uks-only-option>; HM Government, “First Annual Report of the Inter-Departmental Ministerial Group on Human Trafficking.”

²⁸⁵ Haughey, “The Modern Slavery Act Review: One Year On,” 10.

practices.²⁸⁶ In these areas, co-locating resources was seen to have a visible impact on shifting the overall focus of the modern slavery agenda in these areas to focus more on wellbeing and human rights – rather than solely on criminal justice. In cases where prosecution was unfeasible, staff instead took the opportunity to improve wellbeing, by providing improvement to living conditions. In other areas, response has been varied, reflecting that multi-agency work in response to modern slavery is still a developing area, and although collaborations are in place around the country, they exist at different stages of formality and maturity.²⁸⁷ These collaborations have been beneficial in aligning human and labour rights approaches with criminal justice which can be taken a key positive. Partnerships have been able to leverage the benefits of having a broader range of powers at the table, while the integration of organisations, particularly NGOs, with resources and skills to identify and support victims can too be seen as a huge benefit.

²⁸⁶ van Dyke, “Thinking Outside the Box: Developing Multi-Agency and Multidisciplinary Partnerships to Tackle Modern Slavery in England.”

²⁸⁷ Gardner, Brickell, and Gren-Jardan, “Collaborating for Freedom: Anti-Slavery Partnerships in the UK.”

Key Findings:

- The policing response to modern slavery following the introduction of the Modern Slavery Act 2015 has been evaluated in two key reports; Stolen Freedom, resulting from the HMICFRS inspection into the UK's police and the independent review by barrister Caroline Haughey.
- The literature indicates a range of factors currently inhibit an effective modern slavery response in the UK.
- Stolen Freedom and Haughey highlight implementation gaps across the national response, including on incident and victim identification reporting, data collection, general awareness and knowledge around this issue.
- Overall, this chapter concludes that although progress is evident, and the number of victims referred and convictions made is increasing, there is still much work to be done.

In this final section of the literature review, the key critique around the UK's progress to combat modern slavery has been reviewed. The review focuses in on two key reports in particular; the results of the HMICFRS inspection – Stolen Freedom, and the independent review conducted by barrister Caroline Haughey. The review has identified key provisions contained within the Modern Slavery Act 2015, and practices which create significant challenges to efforts to effectively identify and support victims, in addition to a number of promising practices. The findings discussed in this chapter, in addition to the context set in the preceding chapters which outline the modern slavery problem and the role and application of multi-agency partnership building, provide the reference points needed to effectively analyse and discuss the findings of the project's empirical investigation.

The findings indicate that a variety of factors currently inhibit the UK's anti-slavery efforts. Despite what appear to be promising efforts in raising the profile, awareness and knowledge around modern slavery, significant gaps in the knowledge of how to identify and what to do if workers identify victims still appear to be widespread. In other areas information indicates that modern slavery is still to be sufficiently prioritised in a number of police force regions, further compounding issues in victim identification and support, while national gaps in information recording and sharing mean that the understanding of both local and national pictures of exploitation are riddled with gaps.

Moreover, building upon the discussion in chapter three which identified a number of deficiencies within the NRM, additional and significant questions remains over the suitability of the NRM generally for victims with precarious migration status – particularly in the current political environment, remain under the microscope.

Moreover, while the Modern Slavery Act 2015 has come in for criticism on a number of fronts since its assent, it *has* been recognised as having had a number of positive impacts, not least a stronger national focus on modern slavery generally. But perhaps the most obvious and quantifiable impact is related to NRM referral numbers. In 2015, national referrals to the NRM rose by 40% to 3,266, while the numbers of prosecutions also rose by 19% to 117. These statistics are summarised in Table 2, overleaf. Further increases to prosecutions were also seen in 2016 and 2017, respectively, however the number of those resulting in actual convictions has remained relatively steady, while the actual percentage of prosecutions that result in convictions has actually fallen.²⁸⁸

²⁸⁸ HM Crown Prosecution Service, "The CPS Response to the Modern Slavery Act 2015," 2017, <https://www.justiceinspectorates.gov.uk/hmcpsi/inspections/the-cps-response-to-the-modern-slavery-act-2015/>.

	2014		2015		2016		2017	
	Prose cuted	Convi cted	Prose cuted	Convi cted	Prose cuted	Convi cted	Prose cuted	Convi cted
Offences under previous slavery and trafficking legislation								
Slavery, servitude and forced labour	68	8	79	23	10	24	41	11
Human trafficking for sexual exploitation	110	43	113	76	59	75	69	23
Human trafficking for non-sexual exploitation	75	57	70	14	27	35	19	16
Offences under the Modern Slavery Act 2015	0	0	27	0	155	1	309	63
Total	253	108	289	113	251	135	438	113

Table 2: Modern Slavery Offences in England and Wales 2014-2017²⁸⁹

Although the statistics appear to show improvements in referrals and convictions, which, to some extent can be attributed to measures implemented as a result of The Act, its true impact and efficacy will only be evident over the next few years, as revised processes and guidance become embedded into operational practice, and as more cases are concluded (many modern slavery cases take more than a year to be concluded).²⁹⁰

²⁸⁹ HM Government, "2018 UK Annual Report on Modern Slavery," 2018, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/749346/2018_UK_Annual_Report_on_Modern_Slavery.pdf.

²⁹⁰ Haughey, "The Modern Slavery Act Review: One Year On."

PART 2 – THE METHODOLOGY

5 METHODOLOGY

5.1 INTRODUCTION

Preceding chapters have sought to analyse and understand the existing literature that surrounds current anti-slavery practice in the UK, looking at the models, doctrine and cultures that influence and shape the UK's response to modern slavery, in particular focusing on placed-based multi-agency partnerships.

In order to sufficiently and rigorously examine the factors impacting upon the field of interest, and within the context of the research questions, the formulation and subsequent execution of an appropriate research design is needed. This execution, when conducted with sufficient rigour, will enable parallels to be drawn between the primary findings and existing research, literature, policy and other artefacts that have sought to address and discuss similar and contributing aspects of the UK's anti-slavery movement – and the role played by multi-agency partnerships within it.

Using the case-study method, the study takes an interpretive grounded theory approach that leads to theory generation, conducting exploratory open-systems research into the role and impact of place-based multi-agency anti-slavery partnerships in the UK. The overall approach is illustrated in Figure 5, below.

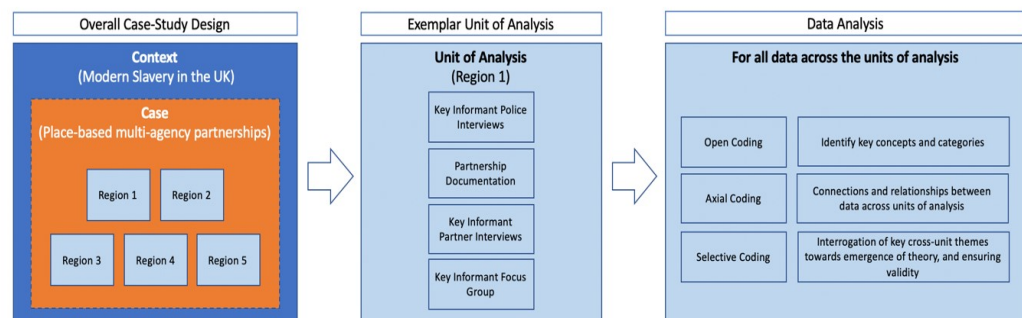


Figure 5: Research process

The context for the case study is set through the introduction of the Modern Slavery Act in 2015. A cornerstone of the UK's anti-slavery strategy, the legislation was positioned as a means to make the UK a leader in this field, and its

introduction coincided, and in many ways contributed to the prominent policy position of modern slavery since its introduction. Within this broader context, the study positions place-based multi-agency anti-slavery partnerships as a single case, with five regional embedded units of analysis. The framing of the issue as a single case enables the study to develop a nuanced and empirically rich account of anti-slavery partnerships, structures whose role and impact are difficult to assess and not necessarily amenable to measures that aim to directly quantify them.²⁹¹ Within its single case, the study positions five discrete regional partnerships as embedded units of analysis, embracing interpretivism as a means of understanding the subjective perspectives and realities of individual research participants in order to shape narratives around the current state of anti-slavery work.

The study uses multiple qualitative data sources; primarily key informant interviews with police personnel in each of the five regions – combined with supplementary data acquired through observing police personnel, the completion of a single focus group and the use of additional data from documentation associated with partnership work and aspects of the police’s anti-slavery work.

Yin, in framing case-study as a methodology describes research design as “the logical plan for getting from here to there”, emphasising it as a logical series of processes that guides the empirical research process from its initial question or objective, through to its outcomes.²⁹² In defining that process for *this* study, this chapter is presented across two sections. Firstly, in part one, potential philosophical and methodological considerations needed to help distil and unpack phenomena are identified and discussed, leading to the selection of a research strategy appropriate to the research. In the second part, the specific research design for this investigation is defined. It includes information regarding the selection of the units of study, the information elicitation and analysis techniques being used and the target participants, as well as defining the overall boundary

²⁹¹ Robert K Yin, *Case Study Research: Design and Methods*, 5th ed. (Thousand Oaks, California: Sage, 2013).

²⁹² Yin.

and scope of the research project, and the overarching methodology upon which the investigation is based.

Accurate and concise articulation of research design seems especially vital when contemplating the use of a case study approach.²⁹³ In the past, high levels of conjecture have surrounded not only the validity of the approach as a whole in providing outcomes that are suitable for the abstraction and generalization of theory, but also due to a lack of clarity and consistency in what a case can be defined as; with some approaches drawing on specific institutions whilst others use specific issues or problem domains, and everything in between.²⁹⁴ For this purpose, the concept of the case study approach itself will be discussed before being aligned and contextualised to address the specific problem under focus.

5.2 PHILOSOPHICAL AND METHODOLOGICAL POSITIONING

5.2.1 RESEARCH CLASSIFICATION

Research methodology, in this chapter has been divided into a number of sub-sections: strategy, approach and method. Methodology at the general level can be defined as the process by which one can formulate and execute a design applicable to the research aim. Often however, in reference to the case study approach, terminology referring to research, method, strategy and approach are used inconsistently or interchangeably. Therefore, to ensure clarity, and subsequently the validity of the approach being employed here, these terms are differentiated using the following definitions, as expressed by Yin.²⁹⁵ It is important to note that these terms may of course be used differently in other studies but will be considered as such for the purposes of this research. Within these three components, the concepts of purpose, process, logic and outcome (as

²⁹³ Yin.

²⁹⁴ H Simons, *Case Study Research in Practice* (Thousand Oaks, California: Sage, 2009), <http://uk.sagepub.com/en-gb/eur/case-study-research-in-practice/book208062>.

²⁹⁵ Simons; Yin, *Case Study Research: Design and Methods*.

defined by Collis and Hussey) are also used to unpack further the ideas of strategy, method and approach.²⁹⁶

- **Research Strategy** refers to the processes by which we access the case, why it is being conducted (the purpose - i.e. analytical, descriptive or exploratory) and the intended or expected outcomes(s), such as its general contribution to knowledge, and more specific solution to a given problem.
- **Research Methods** are techniques of research, such as interviewing or participant observation. They are the practical 'methods' by which data is ascertained and elicited from the case itself.
- **Research Approach** is the intent and methodological purpose that impacts and underpins decisions taken to determine which methods are used to gather and assess data. I.e. the 'case study', including the general logic of the research (inductive vs. deductive etc.).

Considerations such as these are tacitly influenced by research philosophy and the transition from theory into practice, whilst also being coloured by the researchers own epistemological worldview. Further to this, actual research strategy is also determined by the explicit requirements of the study and thus, methodological choices are ultimately made based on a combination of these factors.²⁹⁷

Therefore the philosophical direction of any research is of particular importance as it provides means to clarify research design and the basis of the researchers ability to assess which designs will work, or fail, allowing the researcher to select methods outside of their comfort zone or that may be innovative for the field of study they are operating within.²⁹⁸ The considerations associated with each of these criteria are discussed in the following sections - describing the specific

²⁹⁶ Jill Collis and Roger Hussey, *Business Research: A Practical Guide for Undergraduate and Postgraduate Students*, 3rd ed. (Palgrave Macmillan, 2009).

²⁹⁷ Mark Easterby-Smith, Richard Thorpe, and Andy Lowe, *Management Research: An Introduction*, 2nd ed. (London: Sage, 2001), <https://doi.org/978-0761972853>.

²⁹⁸ Mark Easterby-Smith, Richard Thorpe, and Paul Jackson, *Management Research* (London: Sage, 2012).

design and conditions that influence this study, beginning with its philosophical positioning.

5.2.2 PHILOSOPHICAL POSITIONING

When conducting research, the selection of specific methods is dependent on two major factors. Firstly, the requirements of the study itself and its underlying objectives; and secondly, the beliefs and worldview of the researcher. These factors bring with them a number of assumptions which must be considered and mediated in order to preserve the validity and integrity of the research. Thus, in order to appropriately select the methods and research view, these points must be resolved.²⁹⁹ As the previous section has established, research strategy is influenced by the philosophical perspective of the researcher, be this deliberately or otherwise. Although much of research design focuses on formulating the precise measures that will be used for the collection, analysis and interpretation of data, ultimately, the overall credibility of the outcomes is reliant on the philosophical grounding upon which they are built.³⁰⁰ Thus, in order to ensure that the research outcomes are appropriate these perspectives must be considered during the design phase – These are explored in the following subsections looking at closed and open systems, equifinality and interpretivism.

²⁹⁹ Easterby-Smith, Thorpe, and Lowe, *Management Research: An Introduction*.

³⁰⁰ Easterby-Smith, Thorpe, and Lowe.

5.2.3 CLOSED AND OPEN SYSTEMS

Broadly speaking, research of all kinds exists within two paradigms: *closed and open systems*. Quantitative research, often most commonly associated with research in the natural sciences, often adopts a closed system approach, investigating the relationship between a defined set of variables, and seeks to minimise the influence of other (external) factors. Qualitative methods however more frequently operate within the space of 'open systems', acknowledging the complexity of the objects under analysis, and building into the design an appreciation of the role of external factors on the study.³⁰¹

Case study exists firmly within the paradigm of open systems, enabling the research boundary to be set around these external factors, and allowing the boundary itself to be a porous, permeable concept that can be adapted as new factors come to the fore as the research progresses. This research, as an open systems study therefore faces a number of challenges that result from the empirical world's absence of natural boundaries. The structures, people and processes with which the study is concerned are not delimited by the specific boundaries of the study. The identification of new interdependencies between them and with factors beyond the immediate study boundary can have a profound impact on the results and outcomes.³⁰²

The case boundary can also be considered a temporal issue. Studies, such as that undertaken by Lundgren et al. which investigates technological innovation and evolution, have highlighted that the analysis of the same (or analogous) systems at two different intersections in time can yield significantly different results.³⁰³ These considerations are especially relevant here, given the objectives of the case

³⁰¹ Mark J. Smith, *Social Science in Question: Towards a Postdisciplinary Framework* (Sage, 1998); Simeon J Yates, *Doing Social Science Research*, vol. 1 (SAGE, 2004), <http://uk.sagepub.com/en-gb/eur/doing-social-science-research/book209755>.

³⁰² Anna Dubois and Lars Erik Gadde, "Systematic Combining: An Abductive Approach to Case Research," *Journal of Business Research* 55, no. 7 (July 2002): 553–60, [https://doi.org/10.1016/S0148-2963\(00\)00195-8](https://doi.org/10.1016/S0148-2963(00)00195-8).

³⁰³ Anders Lundgren, *Technological Innovation and Network Evolution* (Cengage Learning EMEA, 1995), <https://ex.hhs.se/dissertations/527090-FULLTEXT01.pdf>.

in improving response to modern slavery and how, given the allocation of resource and funding this can be improved through the creation of specific multi-agency structures and processes over time.

Here then, the case and units of analysis (defined in full later in this chapter) are delineated by the connection of actors and activities to partnership-based aspects of anti-slavery work being conducted on a place-based basis in the five selected regions.

5.2.4 EQUIFINALITY

The perceived value of open-systems studies is very much enhanced by the concept of *Equifinality*. Equifinality proposes the idea that all ‘end-states’ or conclusions can be reached along multiple pathways. The concept was initially defined by Von Bertalanffy, and later adapted by Katz and Kahn and contextualised for use in organisational studies.³⁰⁴ They assert that Equifinality is implicit in all case study research as it presupposes that all organisations are unique, and have unique factors such as the expertise and technology they employ, and the economic and cultural environments that they create, which have a significant bearing on actual organizational outcomes.³⁰⁵ Equifinality as it is described here is an important concept in helping to justify the value in conducting case studies, especially in contexts such as this where there is limited opportunity for ‘like-for-like’ cross-examination with similar cases due to the perceived uniqueness of the units under study.

Equifinality then seems especially applicable in this study, where partnerships have formed organically with limited statutory guidance on how they should be

³⁰⁴ Daniel Katz and Robert L. Kahn, *The Social Psychology of Organizations*, 2nd ed. (John Wiley & Sons, 1978); Ludwig Von Bertalanffy, “The History and Status of General Systems Theory,” *The Academy of Management Journal* 15, no. 4 (1972): 407–26, <https://doi.org/10.2307/255139>.

³⁰⁵ Marian Court, “Longitudinal Research,” in *Encyclopedia of Case Study Research*, ed. Albert J. Mills, Gabrielle Durepos, and Elden Wiebe (Thousand Oaks, California: SAGE, 2010), 536–38, <https://doi.org/https://dx.doi.org/10.4135/9781412957397.n196>.

organised, what activities they should undertake and who should be involved outside of those direct statutory commitments, such as the police and local authorities. Different regions have had different levels of exposure to modern slavery incidents and thus have differing levels of experience and expertise. Different locations have different levels of funding, third-sector support and have local governments which are structured and organised in different ways. Despite this, they are created within the same context, and with similar objectives to improve the level of support and service offered to potential modern slavery victims, and to improve efforts to detect, prevent and investigate related criminality.

5.2.5 INTERPRETIVISM

According to Kuhn, research broadly takes place within two contrasting paradigms that define how the researcher views and interprets the environment around them to establish meaning.³⁰⁶ This is often referred to as the researchers 'world view'.

On one side, the *nomothetic* stance describes the researcher as someone who perceives reality as an entity that is separate from the perceptions of the individual and thus can be constructed and expressed in a generalised manner. The second stance, *ideographic*, is based upon the perception that the world can be understood through examining the insights of actors that exist within it. Generally, qualitative work takes the latter stance, placing emphasis on the understanding of people's beliefs and attitudes, and the underlying factors that shape them; such as culture, and their ability to inform and impact action.³⁰⁷ These ontological assumptions lead to ideas of the researcher's own epistemology.

³⁰⁶ Thomas S. Kuhn, *The Structure of Scientific Revolutions* (University of Chicago Press, 1975), https://scholar.google.co.uk/scholar?hl=en&as_sdt=0,5&q=the+structure+of+scientific+revolutions#4.

³⁰⁷ Yates, *Doing Social Science Research*.

It is by taking an idiographic stance then that this project seeks to understand the functioning and role of multi-agency anti-slavery partnerships by interviewing key informants from different organisations engaged with anti-slavery partnerships in five regions of the UK, and interrogating the documentation, structures and processes that underpin them. The empirical work will seek, through interviewing key stakeholders, to unpack perceptions of the value of multi-agency anti-slavery work, and the challenges faced by those seeking to undertake it.

At a general level, the ideographic stance lends itself to an interpretivist perspective due to the emphasis on understanding human behaviour and the factors behind it - factors which are more easily understood through closer interaction with the units of analysis within the case study. Interpretivism, has also been referred to as both a phenomenological and social constructionist approach.³⁰⁸ Although there are subtle differences in the way these terms are applied, the underlying principles of interpretivism remain constant throughout.

Interpretivism detaches itself from positivism in that it positions the researcher as a more active and participatory agent in the study. Positivism places significant emphasis on distancing the researcher from their subjects and phenomena in order to maintain neutrality and reduce potential 'contamination' of the results.³⁰⁹ Interpretivism however, embraces closer interaction as an important facet in helping the researcher to establish deeper, more meaningful understanding of the context with which they are engaged and interested.³¹⁰

Another key attribute associated with interpretivism is the idea that knowledge is subjective, with multiple presumed realities that change the ways in which people act and perceive experiences - placing emphasis on differences in how people

³⁰⁸ Dan Remenyi et al., *Doing Research in Business and Management: An Introduction to Process and Method* (London: SAGE, 1998); Easterby-Smith, Thorpe, and Jackson, *Management Research*.

³⁰⁹ Zina O'Leary, *The Essential Guide to Doing Research*, 1st ed. (Thousand Oaks, California: SAGE, 2004).

³¹⁰ Joseph G. Ponterotto, "Qualitative Research in Counseling Psychology: A Primer on Research Paradigms and Philosophy of Science.," *Journal of Counseling Psychology* 52, no. 2 (2005): 126–36, <https://doi.org/10.1037/0022-0167.52.2.126>; Jillian Dawes Farquhar, *Case Study Research for Business* (SAGE Publications, 2012), <https://doi.org/10.4135/9781446287910>.

interpret and make sense of them.³¹¹ These interpretations and experiences are based upon the specific frame of reference of the individual, taking into account influence of things such as setting, enabling a deep and thorough insight into the phenomenon to be established.³¹² Working within the tradition of interpretivism is to discern meaning from social phenomena to construct a subjective construction of the truth through the accounts of those working within it.³¹³

These characteristics lend themselves to the utilisation of the interpretivist perspective in this study as a means to observe, through application of the case study method, phenomena within its natural context so that the nuance of the process, culture and infrastructure that impact upon multi-agency anti-slavery work can be understood - when paired with appropriate data collection and analysis methods, themselves discussed later in this chapter.

³¹¹ Carol Grbich, *Qualitative Data Analysis: An Introduction* (Sage, 2012),

https://books.google.co.uk/books?hl=en&lr=&id=B4dkAEIuDz4C&oi=fnd&pg=PP2&dq=qualitative+data+analysis+an+introduction&ots=aDOZNt40jQ&sig=H18s_ARLhPQvD3mehzQ5sWMosxU.

³¹² Nick Lee and Ian Lings, *Doing Business Research: A Guide to Theory and Practice* (SAGE, 2008); Grbich, *Qualitative Data Analysis: An Introduction*; Farquhar, *Case Study Research for Business*; John W. Creswell and Cheryl N. Poth, *Qualitative Inquiry and Research Design Choosing Among Five Approaches*, 4th ed. (Thousand Oaks, California: SAGE, 2013).

³¹³ David Marsh, Selena Ercan, and Paul Furlong, "A Skin Not a Sweater: Ontology and Epistemology in Political Science," *Theory and Methods in Political Science*, 2018, 177–98, https://doi.org/10.1057/978-1-137-60353-1_11.

5.2.6 REFLEXIVITY

Reflexivity is said to provide the necessary critical self-analysis that allows researchers to respectfully interrogate the social world that they investigate, based on the idea that reality, constructed through research, is context-based and historically situated.³¹⁴ Reflexive research entails interpretation and reflection.³¹⁵ Therefore, reflexivity requires the researcher to consider their own positionality; their background, personal values, and experiences and how they affect what they are able to observe and analyse during the study.³¹⁶

My own professional engagement with the anti-slavery agenda outside of this direct study meant that I entered into it with certain preconceptions about the police's role in anti-slavery work. These were also exacerbated in light of wider criticisms from those within the anti-slavery movement that the UK government's framing of the modern slavery issue is currently too focused on criminal justice. Therefore, the decision to explore the role and impact of modern slavery partnerships from the perspective of police – while a clear and important organisation in driving forward anti-slavery work, presents an obvious dichotomy.

These factors meant that by exploring multi-agency anti-slavery work from (primarily) the perspective of police presented a substantial risk that the narrative and findings from the research would themselves reflect the overall framing of the national anti-slavery agenda itself – as primarily an issue of law enforcement. Therefore, to address this explicitly at the study's inception, conscious measures were implemented in the research design, analysis and to some extent the intended presentation of results to ensure balance between issues connected to law enforcement and those more firmly centred around victim identification and

³¹⁴ Natasha S. Mauthner and Andrea Doucet, "Reflexive Accounts and Accounts of Reflexivity in Qualitative Data Analysis," *Sociology* 37, no. 3 (2003): 413–31, <https://doi.org/10.1177/00380385030373002>.

³¹⁵ Linda Finlay, "Negotiating the Swamp: The Opportunity and Challenge of Reflexivity in Research Practice," *Qualitative Research* 2, no. 2 (2002): 209–30, <https://doi.org/10.1177/146879410200200205>.

³¹⁶ Bogusia Temple and Alys Young, "Qualitative Research and Translation Dilemmas.," *Qualitative Research* 4, no. 2 (2004): 161–78, <https://doi.org/Article>.

support. This was done by ensuring that the core research, and participant interview questions were formed with explicit and equal focus and reference to victim support. In addition, due consideration was made throughout the study to ensure that core themes emerging from the resulting data were adequately discussed in terms of their potential to impact upon victims – both specifically in terms of direct identification and support, but also in terms of wider acknowledgement of their implications upon potentially vulnerable or at-risk communities.

5.3 RESEARCH STRATEGY, APPROACH AND METHOD

5.3.1 RESEARCH STRATEGY

5.3.1.1 CASE CONTEXT

In defining and discussing the research strategy it is necessary to briefly revisit the case-context, alluding to the rationale behind the research being conducted in order to appreciate the objectives and rationale behind the research questions being addressed.³¹⁷ Like any organisation, the police and others with statutory responsibilities have to adapt to changes in the external environment. Just as private enterprise has to adapt to changing markets and economic conditions to remain profitable, law enforcement, local authorities and other organisations with statutory responsibilities have to contend with new and emerging forms of criminality, evolutions in criminal behaviour, and changes in funding and resource provisions – in addition to the structural conditions under which certain vulnerabilities prosper (such as migration and welfare policies).

To take the police forward as an example, the financial year 2015/2016 saw continued reductions to Police funding by around 5% across the board, as part of

³¹⁷ Simons, *Case Study Research in Practice*.

government austerity measures to constrain public sector spending.³¹⁸ In real terms actual cuts to police expenditure between 2010-2015 amount to a total of around 20%, with a loss of more than 36,000 personnel nationwide, while further announced cuts are projected to take this number past 70,000 by 2020.³¹⁹ Although resource and staff numbers alone are by no means a measure of effectiveness or efficiency it is clear that such significant changes over a relatively short period of time, and the restructuring that occurs within each force as a result, do not happen without a significant impact upon the strategic, tactical and operational processes of policing.

Despite this backdrop of uncertainty and continued cuts to the amount of resource available, law enforcement remains accountable to the public it serves and is expected to be agile and adaptive to the ever-evolving demands of policing. Central to this, is their ability to change with global evolutions in criminal behaviour and regional, national and international trends in criminality in general that continue to transform with globalization, the proliferation of technology and the resulting changes in societal culture and human behaviour.

Alongside these issues, policy positioning also plays a key role. The overall thesis introduction highlighted how the specific issue of modern slavery rose to prominence, driven by the work of former Home Secretary Theresa May, and the eventual introduction of the Modern Slavery Act in 2015.³²⁰ Coinciding with The Act's introduction, police forces took the initiative and began to scale up efforts in response, establishing localised place-based partnerships that aimed to coordinate the efforts of key statutory and non-statutory stakeholder organisations in preventing and investigating modern slavery crime, and taking steps to improve victim identification and support processes – in line with their responsibilities under the National Referral Mechanism (NRM). It is against this

³¹⁸ Danny Shaw, "Police Forces All Face Major Budget Cuts Itle," BBC NEWS, 2015, <http://www.bbc.co.uk/news/uk-31771456>.

³¹⁹ Sara Thornton, "NPCC Chair Sara Thornton: We Must 'Re-Imagine' Policing in the UK," National Police Chief's Council, 2015, <http://news.npcc.police.uk/releases/npcc-chair-sara-thornton-we-must-re-imagine-policing-in-the-uk>.

³²⁰ Home Office, "Draft Modern Slavery Bill."

backdrop that the case and embedded units of analysis defined in the next section are established.

5.3.2 RESEARCH APPROACH

5.3.2.1 CASE STUDY RESEARCH

Case Study is a, primarily, qualitatively focused research method that is used for the collection and analysis of empirical data. The formal embodiment of the case-study approach is widely accredited to the work of Yin, who broadly defines the approach as a platform from which the conditions and relationships between phenomena and their context can be observed and contextually analysed.³²¹ The method is often employed in instances where the lines between the phenomena under observation and the research context are blurred or unclear. One of the key perceived benefits of case study research is that it is considered a 'mixed methods' approach and allows primary empirical data that both qualitative and quantitative to be assembled, showing how key variables interact and influence one another.³²² This enables the analysis of the primary data derived from documentation, statistics, interviews, survey and other approaches to be used as the basis of the empirical data collection derived from the overall unit of study (i.e. 'the case').

Critics of the case study approach have cited concerns over its inability to provide generalizable outcomes, particularly when using a design focused around the use of a single case.³²³ But prescribers of the approach counteract this by stating that the number of cases used is irrelevant as long as the parameters and objectives

³²¹ Robert K Yin, "The Case Study Crisis: Some Answers," *Administrative Science Quarterly* 26, no. 1 (1981): 58–65, <https://doi.org/10.2307/2392599>; Yin, *Case Study Research: Design and Methods*.

³²² Robert E. Stake, *The Art of Case Study Research*, 1st ed. (London: SAGE, 1995), https://scholar.google.co.uk/scholar?as_q=the+art+of+case+study+research&as_epq=&as_oq=&as_eq=&as_occt=any&as_sauthors=stake&as_publication=&as_ylo=&as_yhi=&btnG=&hl=en&as_sdt=0%2C5#0.

³²³ Yin, *Case Study Research: Design and Methods*.

defined by the research can be met through the use of a single case.³²⁴ Further, the perceived lack of analytical generalisation is also considered irrelevant as generalizations are to be made in relation to theory as opposed to as of a larger population.

For multi-case studies, cross-case examination provides scope for the utilisation of 'sub-cases' for validation purposes to enhance the potential for analytical generalization of the results - and thus the contribution to knowledge of the study as a whole.³²⁵ Such an approach however relies on comparable cases to facilitate this process of cross examination, which in many instances is infeasible since the primary objective is to study a unique phenomenon, event, or entity within its 'real world' context. Often, the purpose of the case study, where the data obtained is unstructured and analysis qualitative, is to further understanding of the case itself, rather than generalize or abstract to a wider population.³²⁶

In analysing, and ultimately making sense of data from the case, it is necessary to consider, and ultimately adopt, an approach that allows for the development of inductive theory from observations. In this respect, the principals associated with grounded theory have been used historically in support of validating the case study method.³²⁷ Grounded theory establishes the ability to draw theory from the views and experiences of research participants and how they individually, and collectively interpret their respective 'worlds'.³²⁸ Grounded theory is widely accepted, and widely applied as a valid approach across social science research

³²⁴ Jacques Hamel, Stéphane Dufour, and Dominic Fortin, *Case Study Methods* (SAGE, 1993).

³²⁵ Kathleen M. Eisenhardt, "Building Theories from Case Study Research," *Academy of Management Review* 14, no. 4 (1989): 6–7, <https://doi.org/10.5465/AMR.1989.4308385>.

³²⁶ Roger Gomm, Martyn Hammersley, and Peter Foster, *Case Study Method: Key Issues, Key Texts* (London: Sage, 2000), <http://www.uk.sagepub.com/textbooksProdDesc.nav?prodId=Book208856>.

³²⁷ Eisenhardt, "Building Theories from Case Study Research."

³²⁸ Barney G. Glaser and Anselm L. Strauss, *The Discovery of Grounded Theory: Strategies for Qualitative Research*, 1st ed. (Chicago: Aldine Transaction, 2000); Juliet Corbin and Anselm Strauss, "Grounded Theory Research: Procedures, Canons and Evaluative Criteria," *Qualitative Sociology* 13, no. 1 (1990): 3–21, <https://doi.org/http://dx.doi.org/10.1007/BF00988593>.

disciplines, particularly as they commonly deal with contemporary contexts.³²⁹ Specifically related to its application in case studies, the use of grounded theory is often referred to as 'theory-generated' case study. This particular description places emphasis on the idea of exploring and eliciting the theory behind a specific case in terms of what objectives are trying to be achieved, and understanding how, and evaluating if, it is being successful in meeting these objectives through an interpretative lens that enables the abstraction of theory of the case.³³⁰

While the use of grounded theory is commonplace in qualitative studies, the approach is in reality more than capable of being used within the context of quantitative types of studies.³³¹ Although the overarching principle of grounded theory, as the name suggests, is to facilitate the emergence of theory from data, Glaser states that, in practice, an essential part of case study development is the development of prior theory - in this case, we will refer to the concept of 'foreshadowed problems' - as defined by Smith and Pohland as a means of pre-emptively identifying likely areas of interest based upon initial engagement with the case, and those identified through existing literature.³³²

The case study approach has been supported by advocates of both deductive and inductive approaches. For example, Yin focuses very much on the definition, and subsequent testing, of hypothesis where Eisenhardt instead describes an approach that is more associated to theory generation.³³³ The approach being adopted for this particular study is more closely aligned to the latter, in pursuit of the development of a deeper more holistic understanding of a specific cultural system of action. This is supported by Feagin, Orum, & Sjoberg's interpretation of

³²⁹ Gary Thomas and David James, "Reinventing Grounded Theory: Some Questions about Theory, Ground and Discovery," *British Educational Research Journal* 32, no. 6 (2006): 767–95, <https://doi.org/10.1080/01411920600989412>.

³³⁰ Simons, *Case Study Research in Practice*.

³³¹ Barney G Glaser, *Theoretical Sensitivity: Advances in the Methodology of Grounded Theory*, 1st ed. (The Sociology Press, 1978).

³³² Yin, *Case Study Research: Design and Methods*; Louis M Smith and Paul a Pohland, "Education, Technology, and the Rural Highlands," in *Case Studies in Computer Aided Learning*, ed. Robert L. Blomeyer and Dianne Martin (London: The Falmer Press, 1991), 13–52.

³³³ Eisenhardt, "Building Theories from Case Study Research"; Yin, *Case Study Research: Design and Methods*.

the case study, as the close investigation of single instances of social phenomena provide opportunity to enhance empirical understanding.³³⁴ Primarily, the justification for utilising the case study approach over other qualitative methods comes from the desire to study the unique phenomena of a specific single case.

Although many complementary, and sometimes conflicting definitions of case study exist, the approach is perhaps best summarised as that which allows a particular situation, phenomena or system to be studied within its 'real life' context, enabling understanding of its nuance and complexity. The case study provides an approach through which a particular subject, be it a project, policy, system, etc. can be explored in detail, from a range of perspectives and utilising a range of different evidence bases and research tools towards generating new knowledge to influence professional practice, policy or a specific action or strategy.³³⁵ Case studies are particularistic, descriptive, and heuristic, relying heavily on inductive reasoning in order to handle multiple data sources towards the development of an intensive, holistic description and analysis of a single entity, phenomenon or social unit.³³⁶

The reasoning and justification for singular case design as opposed to using a multi-case design comes from the selection of a case which provides "*critical, unusual, common, revelatory or longitudinal*" rationale.³³⁷ Yin similarly theorises that the single case approach is analogous to a single, or critical experiment, which themselves deal with the five previously mentioned rationale. Lipset, Trow and Coleman suggest that "case studies, like experiments, are generalizable to theoretical propositions and not to populations or universes."³³⁸ The case study

³³⁴ Joe R. Feagin, Anthony M. Orum, and Gideon Sjoberg, *A Case for the Case Study*, 1st ed. (University of North Carolina Press, 1991),

https://books.google.co.uk/books?hl=en&lr=&id=7A39B6ZLyJQC&oi=fnd&pg=PA1&dq=.+A+case+for+case+study&ots=H_8v2bomc9&sig=hHliWchqaswJ_mI9RFXqbs5_rzo.

³³⁵ Simons, *Case Study Research in Practice*.

³³⁶ Sharan B. Merriam, *Case Study Research in Education. A Qualitative Approach* (Jossey-Bass Inc, 1988).

³³⁷ Yin, *Case Study Research: Design and Methods*.

³³⁸ Seymour M. Lipset, Martin A. Trow, and James S. Coleman, *Union Democracy: The inside Politics of the International Typographical Union* (The Free Press, 1956), 419–20, <http://library.wur.nl/WebQuery/clc/1627266>.

does not represent a sample, and in doing case study research the goal is to expand and generalize theories (analytic generalizations) and not to extrapolate probability. Furthermore, even early applications of the case study, such as Allison and Zelikow's explanatory analysis of the events of the Cuban missile crisis, have demonstrated the utility of the single case as the basis for significantly generalizable outcomes.³³⁹

Figure 6 shows a high-level representation that visualises the differences between single and multi-case designs, and those with single and multiple units of analysis.

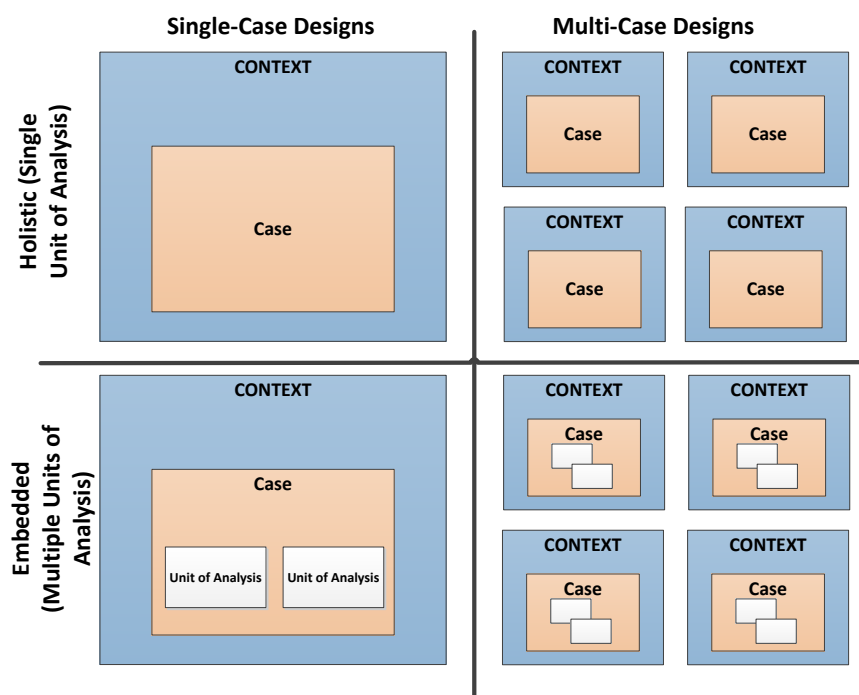


Figure 6: Overview of Case Study Design³⁴⁰

Here then, a single case design will be utilised with multiple units of analysis. However, due consideration was made on how to most appropriately frame the study within the parameters of case study research. Should each region represent a single case within the broader context of anti-slavery partnerships? Or should each region represent an embedded unit of analysis within the single case of 'UK anti-slavery partnerships' and the broader context of anti-slavery work more

³³⁹ Graham T Allison and Philip Zelikow, *Essence of Decision: Explaining the Cuban Missile Crisis*, 2nd ed. (Pearson, 1999).

³⁴⁰ Yin, *Case Study Research: Design and Methods*.

generally. Ultimately, the study emerged somewhat organically as the latter. Although each region's partnership infrastructure were discrete, and found to be unique in their own right they were created in pursuit of similar goals and within the same context.

Therefore, the project is framed as a single case study design, within multiple embedded units of analysis. The broader context within which this work sits (the prominent policy-positioning of modern slavery, the introduction of the Modern Slavery Act 2015 and the continued backdrop of public sector austerity, are summarised briefly earlier in this chapter – and in more detail in the thesis' introductory chapter. The case itself refers to the phenomenon of place-based regional anti-slavery partnerships in the UK, in response to those issues. To study the case, five different regions were selected as discrete units of analysis. The case, these units of analysis, the rationale behind their selection and the data collection methods used is discussed later in this chapter.

5.3.2.2 DESIGNING THE CASE STUDY

Early parts of this chapter acknowledged the ambiguity surrounding the definition of what is, or can be, considered a 'case'. Cases have been used with great variety, with some focussing on individual people, and others on specific policies, institutions or events. Others have focused on the case as more than these entities, instead describing a more intricate 'system-of-systems', or its own functioning entity which can, and potentially should, be considered and studied as a greater whole.³⁴¹

Returning the project's primary research questions, this study is designed around five embedded units of analysis within a single case. Together, the case study seeks to examine:

³⁴¹ Stake, *The Art of Case Study Research*.

- How are multi-agency partnerships being used to combat modern slavery across the UK?
- What impact do those partnerships have on the measures taken to identify and support victims?
- What impact do those partnerships have on efforts to suppress and disrupt traffickers and slave masters?
- What key challenges are there to be overcome to ensure the success of multi-agency partnerships and, more broadly efforts to effectively eradicate modern slavery?
- What are the key principles of effective multi-agency approaches used in response to modern slavery?

To do this it is also important to recognise that the specific boundaries of the research shifted and evolved as the study progressed. The boundaries of the case go beyond accepted physical walls, such as the specific institution or department, and also the policies, and people. Through interacting with institutions (i.e. the police) during the early stages of the research, it became clear that other organisations were also key to anti-slavery work.

In selecting the specific case, Stake advises on its examination where, it is perceived, the most can be learned from it.³⁴² This can be taken to mean the case which is considered to be the most accessible or where the most time can be spent. In this respect, the study's units of analysis were selected on a purposive basis, based on the availability of access and general levels of engagement with the national anti-slavery agenda. Because of this, there was also a degree of convenience sampling involved in the selection of units of analysis as three of five were accessible due to existing working relationships with officers within the police forces studied (although these contacts were not directly involved in anti-slavery work directly) and two further were made available through the national

³⁴² Stake.

Modern Slavery Police Transformation Unit (MSPTU), based in Devon and Cornwall.

While the ‘selection’ of units of analysis did yield a good variety, both in case of geography, and local circumstance, it is worth noting that only regions which expressed a degree of enthusiasm or ‘pride’ in aspects of their own approaches agreed to participate in the study, or where anti-slavery work was being prioritised by the police specifically. A list and brief description of the regions participating in the study are included below. For ethical reasons, which are discussed later in this chapter, region names have been pseudonymised.

Region 1
(Large
Metropolitan)

Region 1 is a large geographic region consisting of multiple metropolitan boroughs, with a combined population of over 2 million – one of which is considered to be one of the largest and most densely populated cities in the country.

Region 2
(Devolved)

Region 2 is a devolved region of the UK. It has a population of around 2 million and covers the largest area of any region included in the study. It consists of both densely populated urban areas, and low-density rural areas.

Region 3
(Rural North)

Region 3 is one of the largest non-devolved regions of the UK by geographic area. The area is considered to be one of the country’s most affluent regions, with below average unemployment. Region 3 has large agricultural and tourist industries.

Region 4
(Rural South)

Region 4 is a rural area in the south of the UK. It has a large agricultural industry and a population of around 1 million – similar to region 3, though as it is roughly 50% smaller than region 3, has a higher population density.

Region 5
(Coastal South) Region 5 consists of two counties in the south of the UK with a combined population of over 1.5 million. Region 5 is coastal, with an economy reliant on the tourism and agricultural industries.

There was also a degree of temporal inconsistency in the units of analysis. While data was collected in region one (large metropolitan) over a period of two years allowing for an appreciation of development and change over time (between 2015 and 2017), others represent snapshots at given moments in time. Data from regions two, four and five was collected in 2018, and data from region three was collected in both 2017 and 2018.

Region one was selected as an exemplar case initially as an early adopter of partnership work in response to modern-slavery, work which actually predated the ascension of the (then) Modern Slavery Bill, in 2015. There were a number of reasons for the selection of this as the initial unit of analysis, not least is the availability of access due to existing relationships with the region's police force (through an unrelated research project). However, the unit of analysis was of explicit interest due to being pitched as one of the UK's first dedicated anti-slavery partnerships, and thus provided – at the time - a very non-typical case.

However, following the introduction of the Modern Slavery Act 2015, partnership models gained increasing traction around the country and the opportunity for investigation of additional units of analysis by way of providing some form of comparison as to how models were emerging different around the country, became available. The addition of these extra units of analysis follows the tradition of what Simons referred to as 'foreshadowed problems'.³⁴³

Foreshadowed problems are a process by which the scope of the research is able to evolve and change as real-world events play out. It allows studies to develop in appreciation that there is a likelihood that the foreshadowed problem is

³⁴³ Simons, *Case Study Research in Practice*.

somewhat separated from the realities of the empirical world.³⁴⁴ This process of refinement is often referred to as progressive focusing, allowing for the research focus to be tailored alongside the emergence of issues whilst collecting field data.³⁴⁵ This process of progressive focusing serves an important role within this project, and the case study method generally.

Referring back to single case design, critics of the approach cite concerns over the ability of single cases to provide genuine theory due to a lack of opportunities to analytically generalise the outcomes.³⁴⁶ However, as the previous paragraphs have alluded, the aims of the case itself are not necessarily to provide this type of generalizable output, but rather to elicit an in-depth understanding of a cultural system of action, and the various actors, systems and other variables that are operating within it. Even so, the use of multiple units of analysis in the form of partnerships from across five different regions allows for a certain degree of corroboration, enhancing the validity and generalisation of any findings.

5.3.3 RESEARCH METHODS

5.3.3.1 DATA COLLECTION MECHANISMS

As it is typically employed as a qualitative approach, the case study method typically leans upon interviews, observation of police participants and the analysis of documents and artefacts as the main sources of primary data collection. This study also utilises those sources. Case studies are also often purposive in nature, the traditional discourse around sampling approaches not necessarily communicating well the intentions of case studies - as they infer that the case has

³⁴⁴ Smith and Pohland, "Education, Technology, and the Rural Highlands."

³⁴⁵ Malcolm Parlett and David Hamilton, "Evaluation as Illumination," in *Curriculum Evaluation Today: Trends and Implications*, ed. David Tawney (London: Macmillan, 1976), 84–101.

³⁴⁶ Yin, *Case Study Research: Design and Methods*.

been selected from a larger population of like cases, which is not necessarily true.³⁴⁷

That considered, the selection research participants within each unit of analysis was also done so on a purposive basis. The purposive approach is so defined by the selection probability of participants being 100%, 0%, or unknown, with no way of statistically quantifying the sampling process.³⁴⁸ This approach enables the rich, in-depth analysis of phenomena applicable to the specific case. In order to identify participants effectively; the case study approach relies on the pre-development of theoretical propositions, or as discussed previously 'foreshadowed problems'.³⁴⁹ In this instance it has been proposed that multi-agency partnership work has an impact upon the police and statutory partners' ability to identify and safeguard victims, and assists them in bringing perpetrators to justice.

Propositions such as this aid and guide the selection of research participants. It is important to acknowledge that this approach, although appropriate in the given context, does not provide, or seek to provide, a representative subset of the wider population and as such any generalisations made must be theoretically based, as opposed to statistical.³⁵⁰

For this study, participants are selected on a structural basis due to the importance and relevance of their respective occupational group, or role in multi-agency anti-slavery work, in their region. Primarily, this involved the interview of key informants from the police forces within each of the five regions. Across all regions, officers ranged from those at rank of Detective Constable (DC) to those at rank of Detective Chief Inspector (DCI). In all cases those interviewed were either force Single Points of Contact (SPOCs) or were engaged with anti-slavery partnership work or anti-slavery investigations and could be considered

³⁴⁷ Yin.

³⁴⁸ Yates, *Doing Social Science Research*, 1:42–43.

³⁴⁹ Yin, *Case Study Research: Design and Methods*.

³⁵⁰ John Gill and Phil Johnson, *Research Methods for Managers* (London: Sage, 2010).

authoritative voices within their respective regional anti-slavery partnership arrangements.

Further participants were also selected on an emergent basis (also referred to as opportunistic sampling) as more understanding of the case setting was elicited, advantage of particular events and opportunities to speak with key stakeholders as they arose.³⁵¹ No participants were directly queried for demographic information. Only details regarding organisation and specifics around job roles were asked as this information was deemed relevant to understand the individual and organisations potential role within the anti-slavery agenda at large.

In region one, police interviews were supplemented with a focus group involving other statutory and non-statutory anti-slavery partners (including local government, immigration enforcement, and NGOS). In region two, a further interview was conducted with a member of the regions (devolved) local government. All full list of participants, their associated roles and regions is included in Table 3, overleaf:

³⁵¹ Deborah Cohen and Benjamin Crabtree, "Qualitative Research Guidelines Project," *Robert Wood Johnson Foundation*, 2006, <https://doi.org/10.4135/9781412963909>.

Region	Organisation / Role	Type
Region 1 (Large Metropolitan)	<ul style="list-style-type: none"> • Police / Detective Sergeant #1 • Police / Detective Sergeant #2 • Police / Detective Constable • Police / Detective Sergeant #1 • Police / Detective Sergeant #1 • Police training event (various) • Police / Detective Chief Inspector (Human trafficking lead and head of force intelligence) • Police / Detective Sergeant #1 • Police / Analyst • Police / Detective Sergeant #1 • 12 people, various roles (Multiple NGOs, local authority figures inc. safeguarding leads, immigration enforcement) 	<ul style="list-style-type: none"> • 05-2015 Interview • 05-2015 Interview • 05-2015 Interview • 03-2015 Field memo • 06-2015 Field memo • 09-2015 Field memo • 09-2015 Interview • 09-2015 Field Memo • 09-2015 Field Memo • 09-2016 Interview • 02-2017 Focus Group
Region 2 (Devolved)	<ul style="list-style-type: none"> • Police / Detective Chief Inspector • Police / Detective Sergeant • Central Government 	<ul style="list-style-type: none"> • 02-2018 Interview • 03-2018 Interview • 03-2018 Interview
Region 3 (Rural North)	<ul style="list-style-type: none"> • Police / Detective Inspector • Police / Detective Inspector 	<ul style="list-style-type: none"> • 01-2017 Interview • 02-2018 Interview
Region 4 (Rural South)	<ul style="list-style-type: none"> • Detective Chief Inspector (force human trafficking lead) 	<ul style="list-style-type: none"> • 03-2018 Interview
Region 5 (Coastal South)	<ul style="list-style-type: none"> • Detective Chief Inspector (force human trafficking lead) 	<ul style="list-style-type: none"> • 07-2018 Interview

Table 3: Research Participants

In defining the participants, it is important to consider the role being played by each in terms of achieving the research objectives. A number of different approaches toward framing the nature of participants are regularly cited dependent upon disciplinary background. For instance, Bernard notes important differences between the disciplines of sociology and anthropology in their use of the terms ‘informants’ (anthropology) and ‘respondents’ (sociology).³⁵² Levy and Hollan provide a definition that partially begins to separate between the two, identifying informants as those who describe culture, and respondents as those who discuss beliefs, experiences and behaviour.³⁵³

At this point it is important to acknowledge that the use of the informant in this specific description bears no relation to the use of the word informant by law enforcement and the wider intelligence and security communities – and is used purely academically. For this study, research participants contribute to the study as both respondents and informants.³⁵⁴

As respondents, research participants contribute by illuminating the story of their local anti-slavery landscapes, the behaviour and actions of those with which they work alongside in local partnership arrangements, and their beliefs about the successes and challenges of those partnerships. However, culture is also an important facet of discerning the role and operation of partnerships as the study seeks to attribute challenges and resulting successes that emerge from working within a collaborate multi-agency setting. Therefore, participants are being asked

³⁵² H. Russell Bernard, *Research Methods in Anthropology: Qualitative and Quantitative Approaches* (AltaMira Press, 1994).

³⁵³ Douglas Hollan, “Setting a New Standard: The Person-Centered Interviewing and Observation of Robert I. Levy,” *Ethos* 33, no. 4 (1998): 459–66.

³⁵⁴ Hollan.

to play a dual role in the research, as both respondents and informants. The actual make-up of the informants and respondents is guided by the boundaries of the core case, consisting of key actors within the selected units of analysis - five regional place-based anti-slavery partnerships.

In terms of defining the tangible mechanisms for the extraction of data from the identified participants, a number of approaches have been employed. These primarily include semi-structured interviews, observation of police participants and the extraction of data from documentation such as intelligence reports and meeting minutes. There are a range of factors that bear consideration when defining these mechanisms. For example, surveys often employ wider samples and thus provide greater opportunity for generalisations, whereas mechanisms such as focus groups or interviews can provide scope for the extraction of greater levels of detailed information.

Semi-structured interviews specifically formed the primary means of data collection. This was due to their ability to balance the need to structure discussion around key themes, whilst also enabling the emergence of issues and information that had not previously been considered - yet that was found to be of significance to the study.³⁵⁵ The identification of such themes was initially guided by a review of existing literature, both from the academic and practitioner perspectives, and then iteratively updated throughout the course of the study based upon intermediary trends and findings. As an exploratory study, particular interest lies in understanding the individual accounts of participants working within multi-agency partnerships. Therefore, narrative enquiry was adopted in order to emphasise the participants' own understanding and perspective on their experiences.³⁵⁶ Narrative enquiry was considered an important tool during the study. It allowed the study to piece together an understanding of the partnership

³⁵⁵ Catherine Dawson, *A Practical Guide to Research Methods*, 4th ed. (How To Books, 2007).

³⁵⁶ D. Jean Clandinin and F. Michael Connelly, *Narrative Inquiry: Experience and Story in Qualitative Research* (San Francisco, California: Joey Bass, 2004), <https://doi.org/10.4135/9781412963909.n275>.

landscape from the perspective of practitioners from across five regional anti-slavery partnerships.

5.3.3.2 INTERVIEW DESIGN

Together, the primary research questions and the summary of findings from the background literature come together to inform the semi-structured interviews, and focus group, conducted with key informants from each of the five regions of focus. These questions are listed below in Table 4, along with additional prompts which were used to guide interviews. In instances where repeat interviews were conducted with the same informant (such as in regions one and three) the same template was used, however informants were encouraged, and usually keen, to draw attention to changes, new developments or particular areas of interest during follow-up interviews.

No.	Question	Prompts
1	Does your region have any multi-agency partnership(s) in place to address modern slavery?	<ul style="list-style-type: none">• What do these partnerships 'look' like?• How are they organised?• What organisation(s) coordinate and them?• What other organisations are involved?• How were they identified / recruited?• Do they receive or have funding to participate?• What are their objectives?• Action plans, strategic plans etc.

- Do they have dedicated performance indicators?
 - What are these? How are they measured?
- 2 What activities/roles do the partnerships undertake?
- E.g. intelligence capture, training. Referrals, safeguarding
 - Where do you see the most benefit from the partnerships?
 - What challenges remain to make them more effective?
 - Funding / participation / training etc.
- 3 How do the partnerships help achieve criminal justice outcomes?
- What impact, if any, have partnerships had on efforts to suppress and disrupt traffickers and slave masters?
- 4 How do the partnerships help to achieve victim identification and support outcomes?
- What, if any, impact are partnerships having on the measures taken to identify and support victims?
- 5 What is the police's role in the partnership (if not defined already?)
- 6 What do you think could be done

(realistically) to improve the effectiveness of partnerships?

- | | | |
|---|---|---|
| 7 | Have activities associated with the partnerships have helped improve understanding of modern slavery in the region? | <ul style="list-style-type: none">• Among statutory and non-statutory organisations, and the public in general.• If so, how?• Is terminology well understood? Are links to other crimes, social care situations and safeguarding known? |
| 8 | Have partnerships contributed to an increase in intelligence throughput in the region? | <ul style="list-style-type: none">• Has this intelligence led to increased numbers of referrals and investigations (and prosecutions?)• What, commonly, is the nature of this intelligence?• What makes members of the partnerships ideally placed to contribute in this way?• Are victims (more) likely to come forward?• Is crime more likely to be identified?• Do frontline workers have the training to identify and refer? |
| 9 | Have the partnerships helped to improve the amount of crime recorded by the police? | <ul style="list-style-type: none">• If so, how? |

10	As a result of the work done by the partnerships, is there a greater appreciation of the scale and nature of modern slavery in the region?	<ul style="list-style-type: none"> • If so, how did they help? • What does this picture look like in your region?
11	Would you consider your force to be well equipped to deal with modern slavery?	<ul style="list-style-type: none"> • Has this improved? • Do you have the resource needed? • Do you have training needed? • Does existing policy and practice provide an environment for you to work effectively against modern slavery? • How have the partnerships contributed to any change? (both positively and negatively)
12	What is your perception as to how the partnerships work from a collaboration point of view?	<ul style="list-style-type: none"> • Shared values and objectives • Communication and collaboration etc. • Are there any inter-organisational challenges in terms of group dynamics? • Culture, structure, organisation etc.?

Table 4: Interview Design

5.3.3.3 ADDITIONAL DATA COLLECTION

In addition to the series of interviews, additional data was also analysed. This data included a range of supplementary documents from across the different regions, such as meeting minutes, partnership terms of reference, action-plans, police intelligence products and internal progress reports. These documents provided complementary data to the interviews and were analysed using the same techniques as the interviews themselves. However, rather than the focus being on individual accounts of events, challenges and successes, documents – due to the nature of their content, often provided more ‘fact’ based understandings of regional anti-slavery work, such as detailing activities undertaken, lists of those involved, and their reach. An overview of the documents provided is provided in Table 5, overleaf. A complete list of documents is included in the thesis appendix.

Region	Document type
Region 1 (Large Metropolitan)	<ul style="list-style-type: none"> • Intelligence Product (x6) • Internal reports (x32) • Partnership Documents (terms of reference, meeting minutes, action-plans etc.) (x30) • Other (process charts, PowerPoint presentations etc.) (x18)
Region 2 (Devolved)	<ul style="list-style-type: none"> • Internal reports (X1) • Partnership Documents (terms of reference, meeting minutes, action-plans etc.) (x3)
Region 3 (Rural North)	<ul style="list-style-type: none"> • n/a
Region 4 (Rural South)	<ul style="list-style-type: none"> • n/a
Region 5	<ul style="list-style-type: none"> • Partnership Documents (terms of reference, action-plans etc.) (x1)

Table 5: Case study documents

5.3.4 INTERPRETATION AND ANALYSIS

In order to unpack and distil meaning from the data collection phase of the project, the following considerations were made in regard to analysis and interpretation. According to Simons, data interpretation relies on the design and subsequent execution of an appropriate and robust analysis approach.³⁵⁷ Therefore, in this section, the term ‘analysis’ will be used to define the formal processes that the data is subject to in order to code, categorise and examine it for themes and patterns that can be used to explain the data.³⁵⁸ ‘Interpretation’ on the other hand will be used as the term to define the meaning and insight which is distilled from the data, including that which occurs as a result of more formal analysis and the understanding which emerges more intuitively through prolonged cognitive engagement with the data.³⁵⁹

Despite the widespread proliferation of qualitative studies, and thus the methods used to conduct them, one key issue still remains in that the ways and means of analysis still leave significant scope for the emergence of unreliable or invalid conclusions.³⁶⁰ This is most prevalent in instances where analyses rely more on intuitive approaches in the generation of results, making it difficult to draw a nexus

³⁵⁷ Simons, *Case Study Research in Practice*.

³⁵⁸ Simons.

³⁵⁹ Norman K. Denzin, “The Art and Politics of Interpretation,” in *SAGE Handbook of Qualitative Research*, ed. N. K. Denzin and YS Lincoln (Thousand Oaks, California: SAGE, 1998), 500–515, <http://psycnet.apa.org/psycinfo/1994-98625-030>.

³⁶⁰ Matthew B. Miles, “Qualitative Data as an Attractive Nuisance: The Problem of Analysis,” *Administrative Science Quarterly* 24, no. 4 (1979): 590–601, <https://doi.org/10.2307/2392365>.

between the raw data and the final conclusions of the study, and thus replicability, due to an absence of a clearly defined analysis strategy.³⁶¹

Looking at case study research method specifically, the added complexity of being a mixed methods approach also provides added pressure on the execution of appropriate analysis methods.³⁶² Yin comments that in many instances of case study, the researcher is left with vast quantities of muddled, inconsistent data due to the absence of consideration of such approaches.³⁶³ Qualitative studies also bring the added complexity brought by the potential impact of the experiences and existing knowledge of the researcher(s) themselves and the participants. These experiences can exert influence over the study outcomes and subsequently the analysis methods used to interpret the data.³⁶⁴

To mitigate any potential threat to rigour that the aforementioned may cause; the consideration, identification and execution of appropriate data analysis approaches is fundamental – along with a realistic appraisal of the likely significance and generalisability of the results. Approaches such as thematic, comparative and content analysis are commonplace in qualitative enquiry, and these methods enable phenomena to emerge naturally from data. They allow for the identification of trends within and across participant groups and data-types, whilst also enabling tacit inferences to emerge from the data.

Due to this, data coding and analysis formed a cyclical process. The analysis informed not only by the literature survey and existing knowledge, but also by preceding primary data. In all cases, analysis was revisited when all primary data-collection had been completed in order to ensure that coding was consistent – and to ensure themes that emerged from latter data had not been missed in earlier analyses.

³⁶¹ Matthew B. Miles and Michael A. Huberman, *Qualitative Data Analysis: An Expanded Sourcebook*, 2nd ed. (SAGE, 1994).

³⁶² Yin, *Case Study Research: Design and Methods*.

³⁶³ Yin.

³⁶⁴ Yates, *Doing Social Science Research*.

This approach links to an additional consideration of qualitative data analysis. That is judging the appropriate at which data should be analysed within the study. Previously in this chapter (see section 5.3.2.2), it was identified that the research themes would be progressively refined, re-organised and expanded throughout the course of the research study. To aid this process summary forms were produced directly after the completion of each interview. These were subsequently used to develop unit descriptions for each regional unit of analysis – providing an entry point from which cross unit comparisons could be made.

In assuring the quality and credibility of qualitatively derived data, Maylor and Blackmon suggest a number of high-level concepts to adhere to.³⁶⁵ These concepts, along with the measures employed are listed below.

- **Traceability:** Providing an audit trail that demonstrates where the data came from, ensuring discussion around the data plays explicit reference to the unit of analysis (geographic region) and direct citations.
- **Reliability:** Ensuring that notes and transcripts accurately represent discussions and observations.
- **Completeness:** Ensuring that all materials (notes and transcripts) are retained, and in an ethical manner.

In order to ensure the integrity of data, and subsequently the outcomes of the research, against these concepts, it is imperative to utilise established, rigorous methods of analysis. A key principle of validating the data derived from case studies, as has been previously established, is through a process of corroboration between different evidence sources. This process, known as data triangulation, helps to drive the emergence of trends from the data as well as being one mechanism that assists in establishing the validity of the data.³⁶⁶ This is a key approach used within the study.

³⁶⁵ Harvey Maylor and Kate Blackmon, *Researching Business and Management: A Roadmap for Success* (Palgrave Macmillan, 2005).

³⁶⁶ Creswell and Poth, *Qualitative Inquiry and Research Design Choosing Among Five Approaches*.

Following an inductive line of enquiry, the study utilises the general analytic strategy of grounded theory to build theory from data acquired throughout the course of the case. Glaser, accredited as one of the developers grounded theory sums up the method as a 'rigorous set of processes and procedures that enable the emergence of 'conceptual categories'.³⁶⁷ The underlying focus of grounded theory is on discovering phenomena such as social relationships, group behaviours and culture in contexts and environments where it is unclear as to exactly how the factors impact one another.³⁶⁸ The method seeks to remove the shrouds of conjecture and preconception to establish the truths and underlying processes of what it is that is actually happening.³⁶⁹

There are however conflicting theories on the exact mechanics of how grounded theory can be effectively developed. Although Glaser and Strauss' early work is considered to be the formal origin of grounded theory, there is a significant deviation in how the method has evolved.³⁷⁰ On one hand, Corbin and Strauss place emphasis on the use of heavily prescriptive and structured routines in the analysis of data in order to maintain rigour, whereas Glaser's own approach places value on creative interpretation and openness.³⁷¹ Despite this difference in emphasis Glaser and Strauss together identify four conceptual data analysis principles for use in generating grounded theory:³⁷²

1. Identifying the phenomenon, objects or events of interest.

³⁶⁷ B Glaser and A Strauss, "The Discovery Grounded Theory: Strategies for Qualitative Inquiry," *Aldin, Chicago*, 1967, [https://scholar.google.co.uk/scholar?hl=en&q=Glaser+Strauss+1967&btnG=&as_sdt=1%2C5&as_sdt=#1](https://scholar.google.co.uk/scholar?hl=en&q=Glaser+Strauss+1967&btnG=&as_sdt=1%2C5&as_sdt=1%2C5&as_sdt=#1).

³⁶⁸ Dauna L Crooks, "The Importance of Symbolic Interaction in Grounded Theory Research on Women's Health.," *Health Care for Women International* 22, no. 1–2 (2001): 11–27, <https://doi.org/10.1080/073993301300003054>.

³⁶⁹ Glaser, *Theoretical Sensitivity: Advances in the Methodology of Grounded Theory*.

³⁷⁰ Glaser and Strauss, *The Discovery of Grounded Theory: Strategies for Qualitative Research*.

³⁷¹ Barney G. Glaser, *Basics of Grounded Theory Analysis*, 1st ed. (Sociology Press, 1992), http://books.google.com/books?id=_BlTQgAACAAJ; Corbin and Strauss, "Grounded Theory Research: Procedures, Canons and Evaluative Criteria."

³⁷² Glaser and Strauss, "The Discovery Grounded Theory: Strategies for Qualitative Inquiry," 28–52.

2. Identifying local concepts, principles and/or features of the phenomena of interest.
3. Making initial data collection decisions based on initial understanding of the phenomenon.
4. Through the process of theoretical sampling, identify and refine the groups and subgroups to be targeted.

In recognition of these principles, and to increase the levels of interpretation and abstraction of the data, three different levels of analysis (in terms of coding) are often proposed in qualitative study: open, axial and selective.³⁷³ These are also used in this study.

The first of these processes, ‘open coding’ involves the identification of key concepts and categories – such as phrases and keywords to break down data into more digestible pieces, and establish its key characteristics.³⁷⁴ While, to some extent the core objects of interest are defined by the case itself and the case context open coding is used as an initial coding step in this project, allowing a concrete understanding of each unit-of-analysis to be established, and identification of initial core themes that can be used to inform additional lines of questioning with informants both within and across units-of-analysis.

Based upon this initial phase of analysis, alongside the findings of the literature survey and a wider understanding of the UK’s anti-slavery landscape, initial key informants were selected – i.e. the police to build an initial understanding of the context and current work within each of the five regional units of analysis. Then, using the theoretical sampling approach, in addition to elements of snowball and convenience sampling within each unit of analysis, additional informants and supplementary data were targeted.

Following the process of open coding, ‘axial coding’ was used to establish connections and relationships between data by utilising a coding paradigm that establishes causal conditions, context actions/interactions and consequences of

³⁷³ Corbin and Strauss, “Grounded Theory Research: Procedures, Canons and Evaluative Criteria.”

³⁷⁴ Yates, *Doing Social Science Research*.

interactions taken. This process helps to establish the complexity and density of the data and the relationships that exist between content categories that may not have been evident previously.³⁷⁵ During this step, a more detailed descriptive picture of partnerships role and operations were built upon, and some initial comparisons were possible – such as similarities in the activities being conducted, membership and the challenges they encountered.

Following this, the final phase of coding, ‘selective coding’ is the process that enables the analysis of the content to move from a purely descriptive pursuit, and into that which helps with the emergence of theory. The selective coding, as the name suggests focused in on some of the key themes identified during the previous step, focusing more on understanding them, how they were caused and their subsequent implications. The actual process of achieving this involves the further definition and abstraction of concepts and categories before they are brought together to ‘tell the story’ of the data.³⁷⁶ As with the physical methods of collection, the process of analysis through content coding evolved throughout the study, a process known as recursive cycling.³⁷⁷ This reflexive process, enabled insights gained from one interview or piece of documentation – through the initial open-coding stage, to be continuously integrated into future rounds of data collection.

5.3.5 ESTABLISHING VALIDITY

Regardless of method, the quality of empirical research using social methods can be evaluated using four tests: construct validity, internal validity, external validity and reliability.³⁷⁸ These tests, further described by Yin, are often used alongside

³⁷⁵ Corbin and Strauss, “Grounded Theory Research: Procedures, Canons and Evaluative Criteria,” 96.

³⁷⁶ Corbin and Strauss, 116.

³⁷⁷ Kathleen M. Eisenhardt and Melissa E. Graebner, “Theory Building from Cases: Opportunities and Challenges,” *The Academy of Management Journal Archive* 50, no. 1 (2007): 25–32, <http://aomarticles.metapress.com/index/H39K210224013001.pdf>.

³⁷⁸ Louise H. Kidder, Charles M. Judd, and Eliot R. Smith, *Research Methods in Social Relations* (Holt, Rinehart and Winston, 1986),

the case study method, are contextualised below.³⁷⁹ In this section, the approaches used in this study to ensure validity are discussed. The process of ensuring validity will take place as part of 'selective coding' during which the analysis will seek to establish the 'chain of evidence' between different data sources both within and across different units of analysis in order to generate new theory.

Firstly, the notion of *Construct Validity* helps establish the extent to which the study being undertaken measures the concepts that it purports to be studying. In real terms, construct validity testifies to how well the results obtained fit the theories or questions around which the test is designed.³⁸⁰ For this exploratory study, multiple sources of data (evidence) will be used – such as interviews, overt observations, and through the analysis of documentation such as intelligence reports, with key informants reviewing draft case study reports. Such measures seek to establish the 'chain-of-evidence' between that which has been observed and analysed from the data, and that which it is seeking to shed light upon.

The review of empirical evidence reports by key informants for further validation allows participants to further clarify, interpret and contribute new evaluative perspectives on the deliverable (i.e. the research outputs) as described in the qualitative evaluation approach offered by Krefting.³⁸¹ Furthermore, other suggested measures such as triangulation and the use of structured processes for interviewing, and the subsequent transcription and analysis of the data were implemented in order to enable constructs to be more strongly substantiated while simultaneously mitigating against the threat of the case being overly

https://scholar.google.co.uk/scholar?hl=en&q=kidder+judd+1986&btnG=&as_sdt=1%2C5&as_sdtp=#1.

³⁷⁹ Yin, *Case Study Research: Design and Methods*.

³⁸⁰ Uma Sekaran and Roger Bougie, *Research Methods for Business*, 5th ed. (John Wiley & Sons, 2009).

³⁸¹ Laura Krefting, "Rigor in Qualitative Research: The Assessment of Trustworthiness," *American Journal of Occupational Therapy* 45, no. 3 (1991): 214–22.

subjective.³⁸² All informant interviews used the same over-arching template, and the same coding process.

Internal Validity has been used traditionally in the identification of causal relationships between two or more variables, whereby one may have an influence on the other over the course of the study in quantitative studies.³⁸³ This, and other qualitative studies do not necessarily seek to establish linear causality between two variables, i.e. 'x causes y' relationships, and the direct effect of independent and dependant variables on one another. Instead the study is more interested in the identification of the causes and generative mechanisms that allow inferences to be made about the 'real-life' experiences and phenomena that is being rationalised.³⁸⁴ For example, given the complexity of the case and its context, it would be difficult to establish that increased training for frontline practitioners was the sole and direct cause of an increase in modern slavery victims successfully identified, however likely that scenario might be conceptually. However, through our informants – it is more plausible to identify that the direct receipt of training on the individual instilled confidence to report potential issues or investigate further a situation of risk or vulnerability.

While there are a number of approaches that can be implemented to ensure the internal validity of findings, such as cross-case analysis and expert peer consultation it can be challenging when considering the use of a single case design due to the absence of direct like-for-like references for comparison.³⁸⁵ Despite this, the study will ensure that data analysis is linked to prior theory, while the concepts themselves will be validated through prolonged engagement with the case over time and the use of multiple units of analysis. Triangulation between units of analysis and multiple sources of data within each unit is another

³⁸² Thomas V Bonoma, "Case Research in Marketing : Opportunities , Problems , and a Process," *Journal of Marketing Research* 22, no. 2 (1985): 199–208, <https://doi.org/10.2307/3151365>; Yin, *Case Study Research: Design and Methods*.

³⁸³ Miles and Huberman, *Qualitative Data Analysis: An Expanded Sourcebook*.

³⁸⁴ Roy Bhaskar, *A Realist Theory of Science* (Verso, 2008); Miles and Huberman, *Qualitative Data Analysis: An Expanded Sourcebook*.

³⁸⁵ Yin, *Case Study Research: Design and Methods*.

potentially powerful tool in these instances. Thus, by being able to maintain a degree of close proximity with the case study and the respondents over time it is also possible to assist with mitigating against a lack of internal validity.³⁸⁶ In this study, this was particularly useful, as different units of analysis were accessed at different points in time over a period of four years, each at different levels of maturity and with varying amounts of data upon which to build understanding and draw conclusions.

The third measure, *External Validity*, also often referred to as ‘transferability’, deals with the generalisability or extent to which outcomes can be replicated beyond the scope of the research being conducted.³⁸⁷ For case studies, this process refers back to analytical generalisation and the relevance of the findings to broader theory. With external validity, one of the objectives is to understand why findings are relevant and transferable to the wider domain as well as discussing what they are they relevant to and how they are relevant to it. This is again a particularly challenging concept given the use of five discrete units of analysis, as one of the more obvious means to ensure external validity is cross-case analysis, or by using a wider array of directly comparable units of analyses.³⁸⁸ However, by ensuring the use of clear data collection methods that are both clear and repeatable, and coding and analysis procedures that are well grounded and rigorous, the chain-of-evidence needed to substantiate the link between source data and the wider domain can be still be clearly marked.³⁸⁹ The use of multiple units of analysis is also additional test of external validity. As each unit exists within its own unique sub-context – as every regional situation is unique, and the multi-

³⁸⁶ Yin; Egon G. Guba and Yvonna S. Lincoln, “Competing Paradigms in Qualitative Research,” in *Handbook of Qualitative Research*, ed. Norman K. Denzin and Yvonna S. Lincoln (Thousand Oaks, California: Sage, 1994), 105–17; Elizabeth C Hirschman, “Humanistic Inquiry in Marketing Research: Philosophy, Method, and Criteria,” *Source Journal of Marketing Research* 23, no. 3 (1986): 237–49, <https://doi.org/10.2307/3151482>.

³⁸⁷ Miles and Huberman, *Qualitative Data Analysis: An Expanded Sourcebook*; Yin, *Case Study Research: Design and Methods*.

³⁸⁸ Eisenhardt, “Building Theories from Case Study Research.”

³⁸⁹ Guba and Lincoln, “Competing Paradigms in Qualitative Research”; Miles and Huberman, *Qualitative Data Analysis: An Expanded Sourcebook*.

agency measures employed equally different, the identification of commonalities and differences across them are valid in their own right.

The final tactic, *Reliability*, builds upon some of the principles associated with the chain-of-evidence discussed earlier in that it intends to ensure that the operations of the study – such as the data collection and analysis procedures, can be repeated by another and the same outcomes still be reached, thus mitigating against the researchers own subjective bias.³⁹⁰ Therefore, previously discussed measures to ensure the chain-of-evidence will be followed in order to ensure that the entire research process is thoroughly documented.³⁹¹ By employing these techniques, in addition to those associated with ensuring construct, internal and external validity will allow a more dependable understanding of the phenomena under study to be established.³⁹²

5.4 ETHICAL CONSIDERATIONS

Ethics generally, within the context of research are concerned with the researcher's relationship with people and systems with which they interact. A fundamental underlying principle in good research ethics is to 'do no harm' and strive to 'do good' - i.e. show beneficence. However due to the potentially complex environment within which the research is taking place, and the diverse factors (social, political, personal) that exist within it, complex and often conflicting ethical challenges can arise, blurring the lines between what may be considered ethical

³⁹⁰ Merriam, *Case Study Research in Education. A Qualitative Approach*; Catherine Cassel and Gillian Symon, *Essential Guide To Qualitative Methods in Organizational Research*, 1st ed. (SAGE, 2004), <https://doi.org/Book>; Michael Christie et al., "Implementation of Realism in Case Study Research Methodology," *Proceedings of Entrepreneurial SMES-Engines for Growth in the Millenium: International Council for Small Business. World Conference*, 2000, 7–10, https://www.researchgate.net/profile/Patricia_Rowe/publication/43095715_Implementation_of_realism_in_case_study_research_methodology/links/09e41507de130b5b6d000000.pdf.

³⁹¹ Eisenhardt, "Building Theories from Case Study Research"; Yin, *Case Study Research: Design and Methods*.

³⁹² Hirschman, "Humanistic Inquiry in Marketing Research: Philosophy, Method, and Criteria"; Christie et al., "Implementation of Realism in Case Study Research Methodology."

or not, and it is not always clear to whom and how, ‘harm’ may be caused.³⁹³ The concept of ethics can, holistically, be considered quite a contextual, abstract term, which may be interpreted differently by different participants during different stages of the study.³⁹⁴ For these reasons, an appreciation of ethics, from both a formal institutional process perspective, and from a research methods perspective, is outlined.

To this end, all planned work takes place within Sheffield Hallam University’s (SHU) ethical guidelines, with no fieldwork undertaken prior to the conferring of full ethical approval via the Faculty of Science, Technology and Arts (STA) Research Ethics Committee. In order to ensure that all aspects of the study fell within the aforementioned guidelines the study has committed to the anonymization of individual participants, and pseudonymisation of the different participating regions, including removal of any information that may be considered sensitive or confidential in nature, such as names of specific place or policing investigations. In addition, all data collected as part of the empirical study is stored securely in line with University guidelines and UK data protection legislation, and the General Data Protection Regulation (GDPR).³⁹⁵

In addition, in order to access protectively marked police documentation such as intelligence reports, case reports and other confidential information, the researcher received Enhanced Non-Police Personnel Vetting (NPPV) according to College of Policing Authorised Professional Practice guidelines at the inception of the study.³⁹⁶

While these formal principles are useful in establishing that the study adhered to formal appropriate ethical frameworks, they only allude to how actions were

³⁹³ Ernest R. House, *Professional Evaluation : Social Impact and Political Consequences* (SAGE, 1993).

³⁹⁴ Simons, *Case Study Research in Practice*.

³⁹⁵ HM Government, “The Data Protection Act 2018,” 2018, <http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>.

³⁹⁶ College of Policing, “APP Vetting,” 2017, <http://library.college.police.uk/docs/appref/C666I0917-Vetting-APP-22.10.17.pdf>.

actually undertaken in practice.³⁹⁷ Therefore, the following section will outline a number of important ethical considerations that have been made in relation to the specific methodological approach taken, the overarching context of the study, and the participants involved.

In case studies particularly, where the underlying objectives involve the engagement and observation of people and phenomena within specific, natural and often unique contexts, the appropriate consideration of ethics, and the potential challenges that may be faced becomes clearer.³⁹⁸ An initial step in this study involved establishing the appropriate trust levels needed to investigate the units of analysis effectively. At the most basic level, this required establishing full and informed consent, and explaining that responses would not be individually or geographically attributable. For regions two-five, this was done using a standard consent forms and information sheets for research participants. However, in region one, due to the more detailed nature of engagement with the case, this was achieved by the agreement of a formal 'terms-of-reference' document, which was reviewed by senior figures involved across the units of study.

Appropriate terms-of-reference for the study were included with any such form. Despite this, it is acknowledged and understood that many of the actual ethical challenges and issues are likely due to arise during the reporting phase. This is commonplace with qualitative case-study research as people and their experience are closely described, thus meaning that it is vitally important to consider what it means to not 'do harm' within the context of the research.³⁹⁹ This particular issue was mitigated through the review of unit descriptions by key informants, a process that served a dual purpose – acting in addition as a data validation mechanism. In regions one and two and, where there was interviews with multiple informants, the process of 'deliberative dialogue' was also employed with participants in order

³⁹⁷ Simons, *Case Study Research in Practice*.

³⁹⁸ Clifford G. Christians, "Ethics and Politics in Qualitative Research," in *SAGE Handbook of Qualitative Research*, ed. Norman K. Denzin and Yvonna S. Lincoln (Thousand Oaks, California: Sage, 2005), 139–64.

³⁹⁹ Simons, *Case Study Research in Practice*.

to ensure that activities are accurately portrayed – leveraging the knowledge and experience to build a consistent narrative of events, corroborating together multiple perspectives.⁴⁰⁰

A second key issue is concerned with anonymisation and confidentiality. While it is considered commonplace to deal with these issues as one and the same, Simons argues the case for making a clear distinction between separate, and equally important and independent issues.⁴⁰¹ Confidentiality, during the study was an important principle in establishing and maintaining trust, an important aspect of establishing true consent due to the potentially sensitive nature of the domain, and access to sensitive and/or confidential documents. However, the sensitivity of the issues went beyond a simple of issue of anonymisation.

Instead confidentiality, and subsequently trust, had to be dealt with throughout the research process. As the research was asking participants to reflect on their own professional lived experience, it was important to ensure they were confident in the research process, and the measures being taken to protect them in order to ensure responses were candid. While on the surface, removing names and referring to staff by role or function may theoretically anonymise the data, within the context of the case it would likely still be possible to connect data to a specific individual. Because of this issue, the challenge could not be resolved by anonymisation alone, and instead a careful process of reflection and review, including with participants themselves was employed to ensure that while candid, information was represented with neutrality, and within broader constructive discussions that are relevant to the overarching aims of the research.

5.5 LIMITATIONS OF THE STUDY

Finally, it also important to acknowledge the limitations of the study based on the methods chosen, and the overall approach and execution of the study. The first,

⁴⁰⁰ Ernest R House and Ken Howe, *Values in Evaluation and Social Research* (SAGE, 1999).

⁴⁰¹ Simons, *Case Study Research in Practice*.

and perhaps most obvious of these limitations is related to the wider ability to generalise the findings. As has been discussed throughout this chapter, the approach is based on five regional units of analysis. Therefore, findings from these five different localities – while providing a good geographic and contextual spread of the UK, only provide results directly attributable to those five regions. Though they provide scope from which we can allude to wider phenomena – this is typically done through corroboration through existing research and secondary sources – such as national statistical data around the numbers of national victim referrals and work based on wider surveys which reinforces the qualitative findings presented here.

A second key limitation is the focus on Police participants. While the police are no doubt key players on this agenda, and in many cases continue to be the primary drivers of partnership work, the outcomes in this research *are* primarily from a policing perspective. This is of course valuable; however multi-agency partnerships are heavily reliant on input from other agencies – particularly local government and charities. Within this study, while the analysis of the data intended to remain neutral, data used in the analysis is primarily from the police, and input from those other organisations is not well represented in the study – outside of a focus group conducted in region one. Despite this, the study – particularly with its focus on victim identification and support over criminal justice, did attempt to reflect on wider perspectives outside of law enforcement.

A final key limitation is to do with the difference in the quantities of information gleaned from each of the different case-studies. The primary unit of analysis, region one contributed greatly more data to the study over time than the other regions. While in some ways a strength as this allowed the findings to reflect on the development of partnership work, and its outputs over a two-year duration – it does mean that there was vastly more qualitative data to draw upon from region one over the other units of analysis. Similarly, the other regions provided ‘snapshots’ of the anti-slavery work in their areas at different periods of time and at different levels of maturity and with different levels of organisational engagement.

Further, regional ‘snapshots’ were provided over a three-year period, between 2015 and 2018. This meant that some units of analysis were temporally less proximate to the introduction of the Modern Slavery Act 2015 and thus had more, or less, time to develop their multi-agency infrastructure. While this removes some capacity for direct comparison between regions, it did reveal that across the case as a whole, similar challenges and experiences were evident across different regional units of analysis at different stages of their respective maturity. It also highlighted how, as a whole the national anti-slavery movement was in its infancy, as regions continued to grapple with development baseline levels of understanding amongst practitioners.

While this meant that regions were not directly comparable with one another, it did mean that as a single case – that of multi-agency UK responses, together the units of analysis come together to establish a set of challenges, perceived benefits and a wider narrative that represents a range of different approaches, which themselves were at different stages of development.

5.6 SUMMARY

Key Points:

- The project uses a single-case study design with five embedded units of analysis as the basis of its approach to examine the role of place-based multi-agency anti-slavery partnerships within the UK.
- The five units of analysis are derived from five discrete geographic regions of the UK following the introductions of the UK’s Modern Slavery Act in 2015.

- Grounded theory is used as part of an inductive approach to build understanding through combining data from multiple data sources, primarily key informant interviews with police personnel.

This chapter establishes the underlying strategy upon which the research will take place, identifying the use of (single) case study with units of analysis with the overarching goal of understanding the role of place-based multi-agency partnerships in the UK anti-slavery movement.

The research uses the case-study method to conduct an exploratory open-systems study into the role and impact of place-based multi-agency anti-slavery partnerships in the UK. The study is designed around a single case and context, with five embedded units of analysis. The case study centres on the role of regional multi-agency partnerships in response to modern slavery in the UK. The case context focuses on the introduction of the Modern Slavery Act 2015 – landmark legislation that was touted to make the UK a leader in this field and the general rise to prominence of modern slavery on the national agenda that incurred, in part, as a result of its introduction. However, despite the introduction of this legislation, the UK's anti-slavery agenda is set against a backdrop of public sector spending cuts, and a number of structural issues – such as exclusionary migration and welfare policies.

Within this broader case study and its associated context, the five units of analysis focus on five different regions of the UK, and the place-based regional multi-agency approaches to combat modern slavery within them. The study embraces interpretivism as a means of understanding the subjective perspectives and realities of individual research participants in order to shape narratives around the current state of anti-slavery work across each of the five units of analysis.

Grounded theory is used as part of an inductive approach to build understanding through combining data from multiple data sources. The study uses a combination of qualitative sources – primarily utilising key informant interviews with police personnel in each region, combined with supplementary data from

observations of police participants, the completion of a single focus group and the use of additional data from documentation associated with partnership work and the police's anti-slavery work more generally. Based on the analysis of this mixed data, elements of summative evaluation are used to question the demonstrable outcomes, and 'net effect' of place-based multi-agency anti-slavery work in each of the five locations.

The study integrated multiple sources of data, primarily interviews (17 conducted in total), but with some elements of participant observation (a police training event), and a focus group held in one region of analysis. These were analysed in combination with 87 pieces of documentation from across the five regions, with documents including multi-agency action plans, terms of reference document, intelligence products and other information used to corroborate themes extracted from the interview and focus group transcripts. Participants within the units of analysis were selected on a structural basis with some elements of convenience and snowball sampling used – focusing in particular on the police.

The final section of the chapter discusses potential ethical implications of the study, identifying how a combination of techniques are used to ensure participant anonymisation and the pseudonymisation of the regions of focus to ensure that participant perspectives could be presented candidly.

PART 3 – RESULTS AND DISCUSSION

6 INTRODUCTION TO THE RESULTS

The following series of chapters presents a discussion of the results arising from the process of data collection (i.e. key informant interviews with practitioners, focus groups and use of documentation) referred to in the previous chapter. It will be recalled that a variety of participants were interviewed, including the Police, and the statutory and the non-statutory organisations with which they work in response to modern slavery, with data from five UK police force areas is used as basis for contrast and comparison. A full index of the data collected is included in the thesis appendix and a description of the methods used in chapter 5.

This data is now used in this, and the following four chapters to address the project's five fundamental research questions:

- How are multi-agency partnerships being used to combat modern slavery across the UK?
- What impact do those partnerships have on the measures taken to identify and support victims?
- What impact do those partnerships have on efforts to suppress and disrupt traffickers and slave masters?
- What key challenges are there to be overcome to ensure the success of multi-agency partnerships and, more broadly the efforts to effectively eradicate modern slavery?
- What are the key principles of effective multi-agency approaches used in response to modern slavery?

In broad terms, the analysis sets out to establish possible links between the challenges identified in the literature review; assessing possible enablers and barriers to effective multi-agency anti-slavery practice. These factors include cultural, organisational and other dynamics that impact upon these collaborative multi-agency partnerships, in addition to macro factors such as the political, legislative and regulatory landscapes that impact and inhibit the anti-slavery

movement at large. This includes building an understanding of how far multi-agency approaches are being employed as a measure to both improve criminal justice response to slavery and to enhance the measures used to identify, recover and support victims and survivors.

The chapters also explore the ways in which the intervening conditions that were employed across the five regions throughout the duration of the study may have contributed to: an improvement in the services offered to victims, a reduction in the threat posed by traffickers and slave masters, and an enhanced awareness and understanding of the true nature and scale of the slavery problem in the UK. These three issues comprise the central challenges that have been identified across national strategies and media coverage, and subsequently as part of this study.⁴⁰²

The chapters themselves respect the overall grounded theory approach defined in the methodology section. Thus, they are structured around five central interlocking themes that emerged during analysis of the primary data. Each theme is presented as an individual chapter. The themes were identified during the data analysis and represent central issues and actions about which the measures taken, and interactions observed within the data are directed. The themes themselves are divided broadly into two categories: intended outputs and intervening strategies. These are visualised in Figure 7.

⁴⁰² The National Crime Agency, "NCA Strategic Assessment: The Nature and Scale of Human Trafficking in 2014."

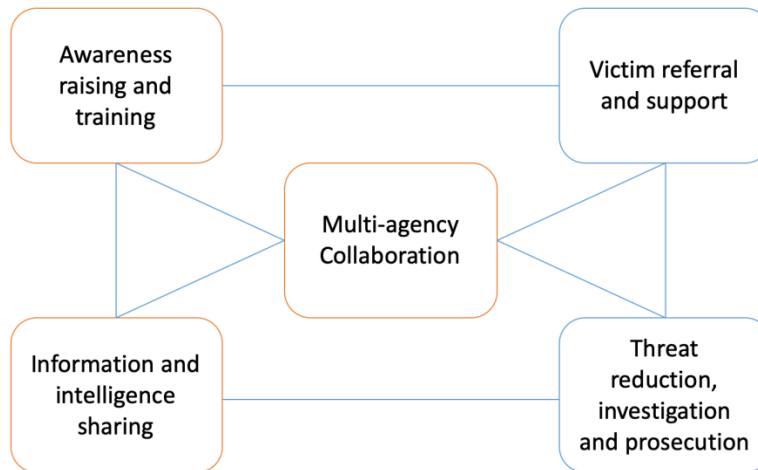


Figure 7: Thematic paradigm

Consequently, these themes, centred around the core idea of multi-agency collaboration, also reflect the core activities which are connected with anti-slavery partnerships; awareness raising, training, victim identification, referral and support, information and intelligence sharing, and criminal investigation and threat reduction.

Despite the definitional agreement that was established in earlier chapters on the differences between modern slavery and human trafficking, of note throughout the empirical data was the interchangeable use of these terms. Therefore, direct quotations throughout this chapter contain references to human trafficking as well as modern slavery. However, it is important to state that these should not be inferred to mean that participants are specifically referencing human trafficking; but rather reflect some of the ambiguity of understanding and definitional imprecision present, at least in the formative periods, of anti-slavery partnerships – and the modern slavery agenda more widely in the UK. However, it was evident throughout the regions studied that following the introduction of the Modern Slavery Act in 2015, the discourse around the issue did evolve, and the use of modern slavery as *the* umbrella term did become ubiquitous.

7 WORKING IN PARTNERSHIP: MULTI-AGENCY COLLABORATION

7.1 MAKING THE CASE FOR PARTNERSHIP

This first chapter of the results addresses the general formation and activity of multi-agency anti-slavery partnerships in each of the five selected regional units of analysis. Before embarking further on discussion around the challenges and interventions that have been experienced and employed by these partnerships in response to modern slavery, it is important to put their objectives, structure and membership into context by explaining exactly what their function is, and how they operate in practice, answering what it actually means for organisations to work ‘in partnership’ on the anti-slavery agenda.

The earlier literature review identified the origins and perceived benefits of partnership working more generally and established how they were formally introduced in the UK in response to child protection issues, through to their current manifestation in the anti-slavery movement. Partnerships have increasingly been put forward as a means of more effectively unifying the skills and resources needed to tackle a range of pervasive social and criminal issues, often in challenging circumstances; such as on the back of national scandal, or in response to public sector austerity; pooling the resources of individual organisations where isolated responses are no longer seen as a viable means able to address problems. The advocacy for a multi-agency approach seeks to establish a sustainable means of collaboration where it is hoped the collective whole is greater than the sum of its parts.

In this regard, modern slavery partnerships are no different, insofar as they tend to convene a unique blend of individuals from a range of statutory and non-statutory organisations to work together to improve victim identification, and support policing investigation and criminal prosecution. Even so, partnerships themselves were found to be far from immune from the effects of sustained austerity, and the call for more money and resources was a fairly consistent theme that emerged across engagement with participants from the five regions studied,

and continues to be a pervasive topic I have encountered through wider engagement with the UK's anti-slavery movement. However, the research found that partnership working was not acknowledged by those engaging in them as merely a sticking plaster in response to austerity, and in only one region (Region Two) did a respondent explicitly acknowledge partnerships as a measure being looked at to fill the void left by public sector budget cuts.

“...We had [a lot of] people, so we did everything ourselves because we have lots of people, so we could always throw people and resources at it. That's not the case [anymore] so we've become a lot leaner and we're having to rely on partners a lot more. So, I think there's been a bit of a silo mentality from the police and a bit of a silo mentality from other statutory agencies.”⁴⁰³

In this region, notably a devolved region of the UK, Police were accustomed to a history of relative autonomy, and to having more substantial resources available, in terms of both finance and personnel. There are also hints that reduced resource had contributed to a shift in the mentality of the police. By the respondent's own admission, the police in the area, and possibly a reflection of police perceptions more generally, had a reputation for being a relatively insular organisation.⁴⁰⁴ It is interesting then that Police then were seen as the primary stewards of partnership engagement across the areas studied - even in cases where they did not necessarily chair or coordinate partnership meetings. Though this view could be skewed, given that the majority of research participants came from the police, existing research in this field overwhelmingly identified that police were the most common chairs and coordinators of partnership work across the UK.⁴⁰⁵ This interest piques further when we consider that much of the activity, partnership engagement and other action documented and discussed throughout these chapters was often deemed reliant on a few individuals. These 'special people',

⁴⁰³ Interview with a Police Detective Sergeant, Region 2, 21st February 2018.

⁴⁰⁴ Herman Goldstein, *Problem Oriented Policing* (New York: McGraw-Hill, 1990).

⁴⁰⁵ Gardner, Brickell, and Gren-Jardan, "Collaborating for Freedom: Anti-Slavery Partnerships in the UK."

their enthusiasm and commitment was identified as an important factor in the furtherance of the modern slavery agenda.⁴⁰⁶

Given the key role of the police in initiating and driving work forward then, the proliferation of the partnership-based approach to tackling modern slavery initially stems from the UK's modern slavery strategy, and the Modern Slavery Act 2015 which operationalises many of its concepts. Both reference the need and importance of a 'victim focused' response from police. Given the nature and potential impact of exploitation on modern slavery victims then, the need to involve partners, especially local authorities and NGOs with remits on safeguarding and the protection of vulnerable populations, provides a clear first step for forces developing capacity to deal with modern slavery as a discrete and emerging issue.

7.2 ESTABLISHING A PARTNERSHIP

The context and rationale for modern-slavery partnerships is now somewhat clear, but it is important to understand why, how, by whom they were established. While the data from region's two to five give snapshots of partnership work at various stages of development and maturity, the research conducted in region one (large metropolitan) was longitudinal and partnership work was studied over the course of a two-year period; beginning at the inception of the partnership structure in the area; considered one of the UK's early adopters at the start of 2015.

Region One's commitment and engagement to the modern slavery agenda was underpinned by substantial investment by the region's PCC, and the resulting introduction of a specialist anti-trafficking unit within the police force towards the end of 2014, coinciding with investment into a partnership-based model to be coordinated by a local NGO. The unit was introduced partly in response to the

⁴⁰⁶ Comments from a representative of a local Community Safety Partnership, Region 1 Focus Group, January 24th 2017.

Modern Slavery Act 2015, and partly due to a large operation in the region within which ~50 potential victims were identified by police.

The operation itself initially began as an investigation of what was believed to be a kidnapping, in some ways foreshadowing the wider problems experienced around the country in recognising modern slavery, and the subsequent push for training in this area. The alleged kidnap was eventually identified as a small element of a larger organised crime operation involving the exploitation of what was believed to be approximately seventy individuals in region one's force area. Due to the number of victims involved and the scale of the problem that was identified incrementally over a period of months after the initial investigation had begun, a dedicated investigation team was established by the force director of intelligence; then thematic lead for human trafficking, to further identify additional potential victims and intelligence. This eventually resulted in the identification of more than 50 potential victims and a number of additional arrests.⁴⁰⁷ Fifteen individuals were ultimately referred through the NRM in total as a result of the operation.

With the benefit of hindsight, the operation could be looked upon as being fundamental in demonstrating the potential value of sustained, joined up and formalised multi-agency work in the region. Due to the scale of the operation and the number of victims involved, an interim reception centre was set up alongside partners from the public and third sectors to provide all those initially identified as possible victims with the immediate support needed. This included the provision of health screenings, using ways of encouraging them to refer through the NRM, and ensuring they were provided with access to services post referral in line with the force's statutory duty.⁴⁰⁸ This is something that would not have been possible without partnership arrangements; and the inter-organisational relationships that come with them, in place.

⁴⁰⁷ Interview with a police Detective Constable, Region 1, 6th May 2015.

⁴⁰⁸ Interview with a police Detective Constable, Region 1, 6th May 2015.

The successes, lessons learned and skills developed as a result, not only sowed the seeds for the formation of formal multi-agency partnerships across the region, but also assisted in the recognition of the need to ensure that knowledge was captured, disseminated and used to support force-wide efforts to prevent and respond to modern slavery.⁴⁰⁹ If the formation of a centralised force anti-slavery team represented a recognition of the need to increase capacity and capability on behalf of the force, the regional anti-trafficking network represented an acknowledgement of the need to integrate other organisations with potential to play a key role in addressing modern slavery across the region, particularly in the identification, recovery and support of victims.

The network in region one, like others across the UK, operates with no statutory footing, relying instead on voluntary commitment and recognition on behalf of the organisations themselves, that they have a role, or duty, to play in the prevention of and response to modern slavery. The earlier literature review found that while passing references to partnership were present in the national strategy and outputs from the IASC – there was little in the way of guidance informing their activities. The terms of reference document for region one’s anti-slavery network established its high-level remit as follows:

“The network is established to provide a strategic meeting framework on behalf of the statutory, non-statutory and third sector organisations in ‘region one’ who contribute to tackling human trafficking and modern slavery in all its forms. The network does not have a statutory role, nor does it have any oversight or governance of any policy, practice or procedure. Individual members are accountable only to their own organisations and are in no way committed to any joint initiatives for or on behalf of the network.”⁴¹⁰

⁴⁰⁹ Interview with a police Detective Constable, Region 1, 6th May 2015; Interview with a police Detective Sergeant, Region 1, 6th May 2015.

⁴¹⁰ Region 1 Anti-Trafficking Network – Terms of Reference, Personal Communication, 10th February 2015.

A major underlying factor in the adoption of the region one model was the force's desire to close gaps in the provision of victim care and encourage the exchange of experiences and the development of effective practices, trends and patterns, including the identification of training needs and the implementation of information exchange protocols.⁴¹¹ These features were also evident across the other regions studied. Despite its absence of statutory footing, the regional network acts as a central hub for localised divisional multi-agency partnerships, promoting the work from across the region and connecting the strategic priorities set by the by the regional network, cascading down from the PCC, through to localised activities undertaken by the partnerships.

The network was positioned as a central support structure, one aiming to instil a culture of voluntary participation and commitment from a number of partners and a mechanism through which other key activities such as the provision of training could be organised and effectively disseminated.⁴¹² In region one, the policing lead for partnerships remarked that role of the work being done regionally, through the network, was being used to set a precedent for the creation of smaller networks across the region's various policing districts:

“[The] hierarchy of the ‘region one’ anti-trafficking network was that the terms of reference and ongoing work should cascade down into the work being done across the five districts. Vice versa, the work being done across the five districts should, and would, feed-back up into the work of the regional network. The regional network acts as the central forum where everybody has a chair; local authorities, police, law enforcement, NCA, NGOs... and that is how all that should, and to some degree does, work in practice.”⁴¹³

⁴¹¹ Region 1 Anti-Trafficking network – Terms of Reference, Personal Communication, 10th February 2015; Region 2 Organised Crime Task Force Modern slavery and Human Trafficking Terms of Reference, Personal Communication, October 2017; Region 5 Terms of Reference and Outcomes, Personal Communication, October 2017.

⁴¹² Comments from a local victim support NGO, Region 1 Focus Group, 24th January 2017.

⁴¹³ Interview with a Police Detective Sergeant, Region 1, 7th September 2016.

Region one, one of the largest geographic policing areas in the UK, is built up of a number of separate policing districts. Central to the success of the partnership approach in the area was considered to be voluntary commitment to the modern slavery agenda from each of these districts, and the respective police contact points within them, and in engaging with other statutory, and non-statutory, organisations in their areas.⁴¹⁴ In essence, the divisional police contact points undertake responsibility for all criminal investigations in their areas, unless there is deemed to be a significant organised or cross border dimension to the crime from the investigation's outset. In this regard slavery is managed no different from any other form of potentially serious and organised crime, with the central anti-slavery unit serving in an advisory capacity. Therefore, much of the progress made centrally within force has the potential to be undermined in the absence of diligence at the district level. To establish the "co-ordinated and established response" demanded by the force modern slavery policy, capacity building work began in 2015 across each of the force districts, laying the infrastructure needed to facilitate partnership working and the organisation of regional anti-slavery forums.⁴¹⁵

While the requirement to form partnerships at district level was strongly encouraged within force, a significant degree of autonomy was left to district coordinators to define the exact processes and mechanisms through which to build these partnerships, how often they should meet, "*what they do and how they can help.*"⁴¹⁶ While a sergeant from the central anti-slavery unit maintained contact, and where possible physically attended meetings across all the districts to guide and share what approaches were being taken in other parts of the region, the approaches and results arising from them did tend to vary from area to area.⁴¹⁷ And, while some areas progressed quicker than others, work was undertaken all

⁴¹⁴ Comments from a representative of a local Community Safety Partnership, Region 1 Focus Group, January 24th 2017.

⁴¹⁵ Region 1 Force Human Trafficking Plans and Updates, Personal Communication, September 22nd 2015.

⁴¹⁶ Region 1, District Y, Creating a District Forum, Personal Communication, 14th September 2015.

⁴¹⁷ Region 1 Human Trafficking Team Report January to June 2015, Personal Communication, 2nd June 2015.

across the regions to create district level slavery plans, establish terms of reference and key priorities, identify core partners and training needs, and put in place intelligence and information sharing processes.⁴¹⁸

“Generally, each division has carried out some form of review of the human trafficking operations - investigations that they have undertaken to date. As a result of the review they have considered, who their key partners were during these periods. From this, work has been undertaken around lessons learned and good practice. This has sometimes been done stand alone, without partners, but often it has been done in consultation with them, in the form of an event hosted within the respective police division.”⁴¹⁹

One of the key reasons for investing individual areas within the region with a degree of autonomy and flexibility when setting up their partnership networks was because the exact makeup of each area, in terms of statutory roles; particularly within local authorities, was found to be different. Across the district regions, specific roles sat within different parts of different organisations, and in some cases, specific roles did not exist, or their responsibilities sat within other positions.

“...each local authority is structured differently. For instance, district x has nine directorates which cover the district X council. District Y has only about four or five so different roles and functions sit in different areas of the organisations [...] If the current approach was now to be changed and, for instance, it was dictated that the district lead was to come from a specific area – such as emergency planning. Not all districts have an

⁴¹⁸ Region 1 Human Trafficking Team Report January to June 2015, Personal Communication, 2nd June 2015.

⁴¹⁹ Region 1 Police Human Trafficking Team Report January to June 2015, Personal Communication, 2nd June 2015.

emergency planning officer so straight away the model starts to fall down.”

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Despite these differences, a core set of organisations and roles were largely represented across each of the area groups. These were also found to be mostly representative of the organisations represented in the other regions studied. While these organisations represent only the core stakeholders, the principal agencies amongst them – namely those from the public and private sectors can reach out and engage more broadly if needed. Common participants include:

- School safeguarding leads,
- Public health professionals,
- the ambulance service,
- child safeguarding,
- Adult safeguarding,
- Clinical Commissioning Group Safeguarding leads,
- a suitable individual to represent the interests of General Practitioners (GPs),
- emergency planning,
- Child Social Care,
- School safeguarding lead,
- Public health,
- Ambulance service,
- Child safeguarding,
- Adult safeguarding,
- Clinical Commissioning
- Group Safeguarding leads,
- victim and survivor support NGO(s),
- and the Salvation Army.

Once established these local area networks established divisional plans and issued terms of reference to the respective participating agencies. These plans include information such as training requirements and processes for the acquisition and handling of what became known as ‘soft intelligence’, and information on suspicious activity or potential victims or vulnerability coming from partner organisations to the police. In all areas, training was singled out as a specific priority in order to increase “candidate knowledge and awareness of the subject,

⁴²⁰ Interview with a Police Detective Sergeant, Region 1, 7th September 2015.

the surrounding processes and the role that many of the partners have in tackling the problem of human trafficking.”⁴²¹

Following the onset of formalised partnership working, region one, as a force area recorded one of the highest NRM referral returns in the country in 2016. Within the region itself it was believed that a lot of effective practice had been developed in regard to victim identification and NRM referrals.⁴²² But, NRM referrals alone cannot be considered a sole factor of success in this regard, especially as there is no clear causal link between forming partnerships and increasing referrals.

Stepping back to look at region one more generally, there was a clear perception that the areas partnership work was delivering real tangible benefits to the organisations involved and ultimately to those at risk, or who were victims of modern slavery, and not necessarily something that was being replicated elsewhere in the UK. This was similarly reinforced by comments made during the HMIC inspection made during 2017 that suggested the region was an area of ‘best practice’ which other regions could follow.⁴²³

⁴²¹ Region 1 Force Human Trafficking Plans and Updates, Personal Communication, 22nd September 2015.

⁴²² Comments from a UK Visas and Immigration representative, Region 1 Focus Group, 24th January 2017.

⁴²³ Comments from a member of Her Majesty’s Inspectorate of Constabulary, Region 1 Focus Group, 24th January 2017.

7.3 STRUCTURE AND MEMBERSHIP

Whilst it is entirely possible that the modern slavery strategy and Modern Slavery Act 2015 provided the essential spark that put partnership working front and centre in the minds of the police, it arguably failed to provide sufficient guidance as to how they should set about developing an appropriate infrastructure and populating it accordingly. There was, and remains, no statutory requirement for their formation. Moreover, only in Northern Ireland does the national modern slavery strategy explicitly outline and reinforce the potentially “massive impact” that civil society organisations, other than the police, can have in tackling the problem.⁴²⁴ Moreover, as discussed in the preceding section, force areas themselves were also in some cases keen to maintain autonomy in the formation of partnership arrangements.

As a result, what emerged was, as Gardner describes, “a patchwork” of partnerships around the country – organised around police force boundaries.⁴²⁵ The case studies conducted in the regions studied here show that the form, structure and maturity of partnerships were distinctly different from region to region; supporting Gardner’s findings reported that partnerships were regularly formed around local conditions, local resources, and local personalities.⁴²⁶ Regions one and two were recognised as early adopters of the partnership approach with work in those areas evident from 2015.

Structurally, region one in particular had formal partnership action plans and terms of reference in place at a regional level, as well as sub-regionally among individual policing district areas. While in regions two and four, two groups met regularly; an operational group and a strategic group. In terms of organisation and hierarchy, though there was little consistency evident from one partnership to the next – the structure of the partnerships studied could, with a few exceptions, be

⁴²⁴ Interview with a central government representative, Region 2, 19th February 2018.

⁴²⁵ Gardner, Brickell, and Gren-Jardan, “Collaborating for Freedom: Anti-Slavery Partnerships in the UK.”

⁴²⁶ Gardner, Brickell, and Gren-Jardan.

captured within the framework shown in Figure 8. However, not all partnerships necessarily contained all of these elements.

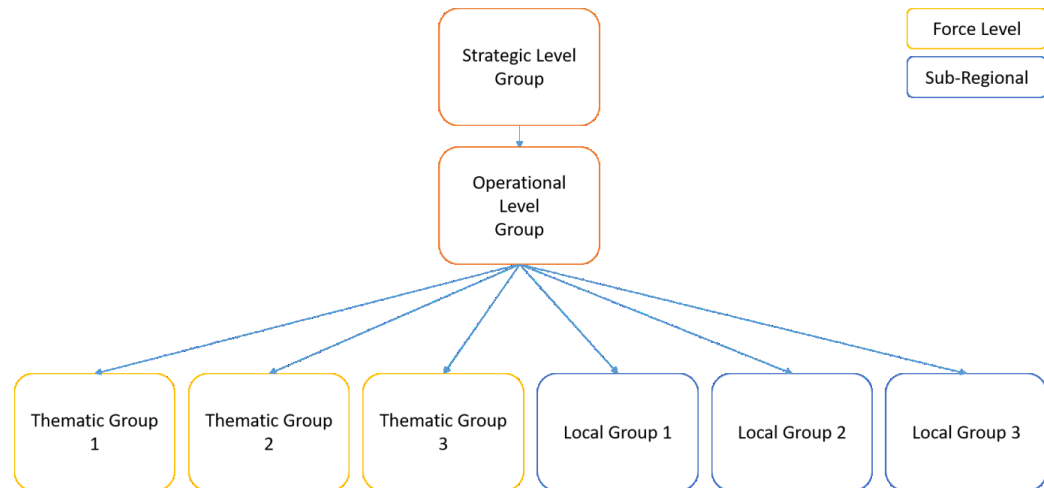


Figure 8: Generic anti-slavery partnerships structure framework

All the regions studied had at least one central group that operated on the basis of a force-wide remit. In some areas this was divided into two groups; differentiating between operational and strategic levels, with these levels reflecting the relative seniority of members and attendees, and the consideration of strategic level, or more operational issues.⁴²⁷ Some areas, particularly those which covered a broad geographic expanse, also had sub-regional groups covering specific districts or boroughs. Some regions also had thematic groups that focused on specific problem areas - such as sex work or child exploitation, either due to their perceived persistence or due to the presence of a nucleus of NGOs working specifically in those areas.⁴²⁸

⁴²⁷ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018

⁴²⁸ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018; Interview with a central government representative, Region 2, 19th February 2018; Interview with a Police Detective Sergeant, Region 2, 21st February 2018; Region 1 Police Human Trafficking Team Report January to June 2015, Personal Communication, 2nd June 2015; Region 2 Organised Crime Task Force Modern slavery and Human Trafficking Terms of Reference, Personal Communication, October 2017; Region 5 Terms of Reference and Outcomes, Personal Communication, October 2017.

However, in some areas, most notably regions one (large metropolitan) and two (devolved), the partnership structure was rather more developed – and a clear mapping of how the partnership entities sat within the broader context of regional and national police was established. The following case study describes the structure employed in region one. Whilst more developed than the others, the model, objectives and general approach was indicative of that in other regions.

Example 1: The structure and organisation of region one

The model employed in region one centres on a regional anti-slavery network; chaired by the police force and coordinated by a local NGO. The network brings together those stakeholder organisations who have either a statutory role to play in the identification and safeguarding of victims, or who believe they are in a position to contribute to the area voluntarily. Below, Figure 9 presents a high-level makeup of the various groups whose activities across the region contribute to anti-trafficking efforts across the force area under focus.

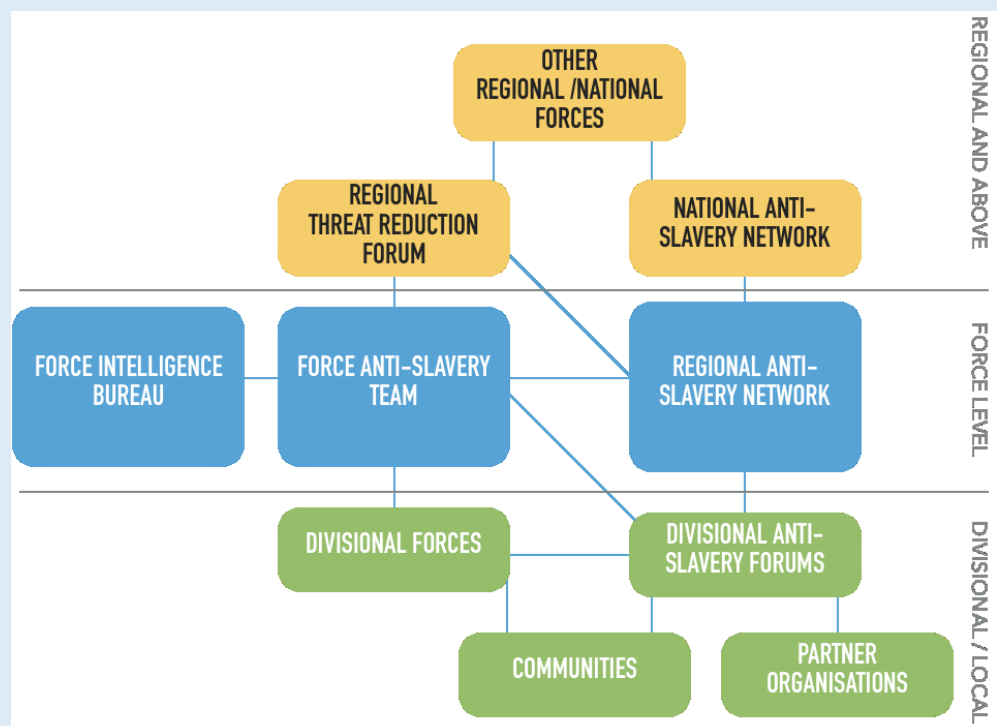


Figure 9: Multi-agency working across the region one

The force also clearly identified the need for active collaboration beyond its own jurisdiction; particularly in relation to victim safeguarding and support., whilst also looking international to establish the need for *“targeted activity in countries of origin which looks at prevention, law enforcement collaboration, civil society engagement, the development of economic opportunities and reintegration of survivors...”*⁴²⁹

Region one also had dedicated police resource to focus on modern slavery held centrally within force. This group held the remit for upskilling divisional police within the individual districts so investigations could be mainstreamed and directly managed. While these dedicated personnel were in place, their positions were only funded for an initial period of two-years, and so significant focus was placed on overseeing the upskilling of divisional police to manage issues locally.

The regional group was more strategic in nature, sitting at the force level and trickling down regional intelligence and priorities to the divisional groups and divisional police who in turn would find information back up to the force level. Continuity was provided by a police officer from within the central anti-slavery team who would attend all meetings, sharing effective practices and challenges between groups and overseeing the work being done across the force region.⁴³⁰

While all five of the regions cited the voluntary participation of other partners as ‘excellent’, region four’s (rural south’s) partnership was unique in its structure due to not being police chaired, and this was cited by police in that region as a key benefit in attracting participation from other organisations.

“Where it is police chaired, it's police-led, all the comments [from other partners] tend to be kept from the police and actually it's quite a struggle to get buy-in from the, often, very strapped organisations. So, in our

⁴²⁹ Region 1, Threats: Prevent Pursue Notes, Personal Communication, 11th January 2016.

⁴³⁰ Region 1 Police Human Trafficking Team Report, Personal Communication, January to June 2015.

county the anti-slavery partnership is chaired by the county council chief exec, which is good [...] He doesn't necessarily drive that work, the fact he chairs it causes people to turn up, so I've got an audience to get the work to be done.”⁴³¹

In region five (coastal south), although the force-wide partnership was police chaired, the work was coordinated by an NGO, placing more emphasis on issues such as raising awareness, safeguarding and fundraising for local provisions such as a dedicated victim safe-house.⁴³² The issue of who is best placed to chair and coordinate partnerships has been quietly debated among and between partnerships for a couple of years.⁴³³ Looking nationally, Gardner's research has shown that nationally an overwhelming majority of partnerships are chaired and coordinated by police.⁴³⁴ However in some cases, such as in region five (coastal south), partners, and the police themselves have questioned whether this is the best and most appropriate approach.

“It kind of seems that from most of the feedback that it's better if it's not a police chair. Because, I assume... It's because we just take over, we don't... If people aren't really willing to do anything or support, we'll just do it ourselves which isn't always the right way to do it to get buy-in from people.”⁴³⁵

Returning to region four (rural south), the role of the City Council chief executive as meeting chair was seen as an important factor in bringing organisations to the table, and an effective measure in preventing the meetings from becoming police-centric, and overtly focused on enforcement. In this region, the lack of formality of meetings was also cited as a distinct positive too, giving the group flexibility to

⁴³¹ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁴³² Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁴³³ Additional engagement with partnerships and National Network Coordinators Forum (NNCF) network, Personal Communications 2018 – 2019.

⁴³⁴ Gardner, Brickell, and Gren-Jardan, “Collaborating for Freedom: Anti-Slavery Partnerships in the UK.”

⁴³⁵ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018.

discuss individual issues on an ad-hoc basis.⁴³⁶ Meanwhile a strategic group, consisting of higher-level statutory organisation representatives maintained a more formal remit and structure.⁴³⁷

In regions one (large metropolitan) and three (rural north), partnerships were both chaired and steered by police. In Region four (rural south), partnership work was recognised as being primarily police driven, but meetings were not chaired or steered by police. Across all regions there was a perception that the models they had adopted, or were in the process of adopting, were regionally appropriate, and gave police, and wider partners, the necessary flexibility to manage local issues effectively.⁴³⁸ In one of the smaller geographic regions studied, region two (devolved) this was stated as being advantageous in removing bureaucracy and not overcomplicating partnership engagements, enabling relationships with key personnel across involved organisations to be kept personal. This resulted in trust that individuals in key roles could be contacted to resolve specific issues as they arose.

“One of the advantages of being quite small is that there's only a few people who are the main points for different organisations. So, we can quite quickly make, make improvements... or if difficulties [are] found, they don't become insurmountable, and you don't come up against a wall of administration. You can really just go to one or two people and you can usually get things rectified.”⁴³⁹

In region two (devolved), a group dedicated to NGO engagement was convened, due to the presence of multiple anti-slavery focused NGOs in the region. The group aimed to coordinate action between third sector organisations working in the region, while in other regions, particularly those which were more rural, and where there was less of an NGO presence, NGO participation was instead

⁴³⁶ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁴³⁷ Interview with a Police Detective Inspector, Region 3, 7th March 2018.

⁴³⁸ Interview with a Police Detective Sergeant, Region 1, 7th September 2015.

⁴³⁹ Interview with a Police Detective Sergeant, Region 2, 21st February 2018.

integrated into existing groups.⁴⁴⁰ Across all regions a number of select ‘special people’ were seen as vital factors driving participation with the partnerships, and general engagement with the modern slavery agenda. Though some regions (such as region one and two [large metropolitan and devolved]) did have discrete funding for partnership work – and had specific roles and functions within that work funded by the government or PCC, the majority did not. This is reinforced by other research mapping partnerships nationally that identified work as being mostly unfunded.⁴⁴¹

7.4 MONITORING AND EVALUATION

Despite the positive work, it is perhaps indicative of the largely autonomous and non-statutory nature of partnerships, tied with their relatively recent emergence and ‘developing’ status that formal monitoring and evaluation processes were not really in place. An indicative example of this was found in region two (devolved) where despite the rollout of widespread awareness raising campaigns and training designed to improve the awareness and sensitivity to the indicators of modern slavery (often referred to as ‘spot the signs’ training) among frontline workers, the extent to which these activities improved people’s ability to recognise victims and take appropriate action was largely unknown.

“They have received intelligence which had led to... that has led to operations and recovery of victims, so I know that has happened. Whether that has happened as a direct result of the awareness campaigns that either the department or any of our partners has done, I think probably that has contributed to general public awareness.”⁴⁴²

Region three (rural north) also reiterated the same point-of-view, suggesting that though they could look to the numbers around things already being measured;

⁴⁴⁰ Interview with a central government representative, Region 2, 19th February 2018

⁴⁴¹ Gardner, Brickell, and Gren-Jardan, “Collaborating for Freedom: Anti-Slavery Partnerships in the UK.”

⁴⁴² Interview with a central government representative, Region 2, 19th February 2018.

intelligence submissions; number's trained etc., they were aware that these were not necessarily indicative of wider progress.⁴⁴³ One region however, region two (devolved), had taken steps to police addresses knowledge gaps around broader public awareness understanding around modern slavery.

“We didn't really have a baseline for measuring the level of public awareness. So, last year we included some questions in our annual crime survey. So, we'll be running that crime survey again this year come to see whether there has been any sort of change. So, it's kind of a perceptions of crime survey so I can send the results to that. But, its slightly more accurate than holding your finger in the wind but, only slightly I think.”⁴⁴⁴

Another key point raised was related to the use of prosecutions an absolute measure of police success. There was a view that the police needed to move away from using prosecutions to measure progress. Though prosecutions were, of course, acknowledged as an important element of police work, a police participant expressed the opinion that it was “perfectly reasonable for a victim [...] not to wish to go through a prosecution.” And that more important in a modern slavery context was to respect and support that and instead focus on signposting and assisting through victim support pathways to ensure that victims' vulnerability was addressed to avoid further exploitation.⁴⁴⁵

On the whole, monitoring and evaluation was found to be at best anecdotal. While perhaps to some extent understandable in its underdevelopment – all five regions were found to rely on drawing correlations with overall trends in increased initial referrals, or intelligence throughput with no real focus on specific direct monitoring or quality control on the activities themselves, or indeed ways of establishing causality between things that had been done, such as business visits, training, awareness campaigns etc. and increases victim identification, referral, support, and the quality thereof.

⁴⁴³ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018.

⁴⁴⁴ Interview with a central government representative, Region 2, 19th February 2018.

⁴⁴⁵ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

7.5 SUMMARY

Key Findings:

- Partnership arrangements were in place across all five of the regions studied.
- The structure, membership and maturity of these arrangements differed from region to region; but there were commonalities evident across the board.
- Regardless of structure and the organisations chairing and coordinating work, respondents from all regions implied that their respective models were regionally appropriate and to some extent successful.
- Partnerships were generally reliant on the work and commitment of a few discrete individuals to push activity forward.
- But despite progress and positive practice across the board, none of the regions studied had formal process or mechanisms in place to evaluate or monitor their activity in a systematic way.

In many ways this chapter sets the scene for those which follow; discussing and reflecting upon the emergence, formation, structure and membership of the anti-slavery partnerships across the five regions studied. While these regions might not constitute a representative sample of the UK in a scientific sense, core trends in their general organisation, remit and strategic function are consistent with the findings of other research into the UK's modern slavery partnerships; namely that of Gardner et al.⁴⁴⁶

Overall, each region had in place partnership arrangements in one form or another, and longitudinal work conducted in region one (large metropolitan)

⁴⁴⁶ Gardner, Brickell, and Gren-Jardan, "Collaborating for Freedom: Anti-Slavery Partnerships in the UK."

demonstrated how this work was ongoing and developing over time - particularly across different regional districts. The exact structure, membership and maturity of the partnership arrangements was different from region to region, but shared DNA was evident across the board, particularly in the nature of the organisations involved and the scope of the activities being undertaken. Moreover, enthusiasm for the partnership approach was found in each region, and all regions expressed that their respective approach was regionally appropriate, catering to their respective needs and bringing value. Also consistent across partnerships was the reliance on a few key individuals in driving forward the modern slavery agenda. But this perhaps it is not surprising given the non-statutory nature of the partnership work itself.

Following this introductory chapter are four more, each focusing on a different aspect of partnership working that emerged consistently across the regions studied; training and awareness, information and intelligence, victim referral and support, and threat reduction, investigation and prosecution. Within them the activities themselves are discussed, in addition to the challenges to which they are associated, and their respective impacts.

8 IMPROVING AWARENESS AND PROVIDING TRAINING

Having, in the previous chapter, explained and discussed the manifestation of partnership working across the regions studied we now move on to four chapters discussing important issues – namely: 1) improving awareness and providing training, 2) information and intelligence sharing, 3) victim referral and support, and 4) threat reduction and police investigation. The first of these chapters focuses on efforts to raise awareness of the modern slavery issue, and the measures taken to roll out training to enable frontline practitioners to better recognise and report potential victims.

8.1 MODERN SLAVERY IS NOT WELL UNDERSTOOD

Findings from the empirical data generally reinforced the idea that the police believed modern slavery is, broadly speaking, not well (or widely) understood by other officers, other public sector bodies and the general public. While national media attention has meant that most are familiar with modern slavery as a concept, levels of confidence in people's ability to identify the signs are low and many still recognise the issue as something that is not local to them and not something, they are personally likely to encounter.

Perhaps then in recognition of this gap it is not hugely surprising that wider research into anti-slavery partnerships in the UK has established that training and awareness related activities were the second and third most common activities undertaken across partnerships - a trend also evident throughout the case study regions in this study.⁴⁴⁷ The same research also identified 'learning' and 'awareness' as the two most common self-identified areas of good practice among partnerships. Across the regions studied and wider surveys into partnership working nationally this was shown to be an area where significant input was being

⁴⁴⁷ Gardner, Brickell, and Gren-Jardan.; Interview with a central government representative, Region 2, 19th February 2018.

made towards ensuring that those in public facing roles within police, local authorities and other organisations were able to identify potential victims, and were aware under what specific circumstances they may encounter them.

Police generally singled out training as a prominent priority across the partnerships.⁴⁴⁸ The narrative around training generally focused on police and frontline staff from other public bodies such as healthcare, the fire service, health and social care, local authorities and in some cases, even prisons.⁴⁴⁹ But what constituted ‘training’ was not always consistent or explicit. A key trend identified across the regions studied was a general lack of differentiation and a clear boundary between the ideas of training and wider efforts aimed at raising levels of knowledge or awareness of modern slavery. In some regions, training was discussed specifically in relation to specialist modern slavery investigator courses for police inspectors, but in others the term was used more loosely to refer to things such as ‘spot the signs’ awareness events and more general workshop events focused on highlighting the modern slavery problem. Due to this, throughout the remainder of this chapter – the term ‘training’ will only be used to describe activities aimed at building explicit skills to solve specific issues or processes that individuals are expected to encounter in their job roles; such as the aforementioned police investigator courses, or courses around how to use the NRM by other statutory first responders. All other activity will be discussed under the heading of ‘awareness raising’.

The matter of increasing the level of individual and organisational knowledge around modern slavery has been continually reinforced by the UK’s Independent Anti-Slavery Commissioner both publicly and through direct communications to national Chief Constables, to ensure that police are sufficiently equipped to enforce and utilise new legislation in the pursuit of offenders and the protection of victims.⁴⁵⁰

⁴⁴⁸ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018.

⁴⁴⁹ Interview with a central government representative, Region 2, 19th February 2018.

⁴⁵⁰ Letter to the Police Chief Constables from the Independent Anti-Slavery Commissioner, Region 1, Personal Communication, 22nd January 2015.

Following the strategic national prioritisation of modern slavery, and in the incoming nature of the modern slavery bill, the earliest example of awareness raising and organisational focusing was seen in region one (large metropolitan). The Police and Crime Commissioner (PCC) for the region organised a large conference in early 2014 – attracting more than a hundred delegates from the public and third sectors, such as healthcare, local housing, safeguarding and social housing.⁴⁵¹ The PCC was seen as a key driver of change in region one and a key advocate for a more joined up collaborative partnership based working, a role recognised by the partnerships themselves.

“...I think it all started for me with the police and crime commissioner. I actually think that he’s driven this well, and I think it been extremely well received by the police force, and I think it’s been extremely well received by us as partners. But I think he should take quite a bit of credit for pushing it as well. I think he drove it really.”⁴⁵²

“I think PCC’s have a massive role to play in this nationally and that is what we’re trying to do as well with the national network and get that across.”⁴⁵³

⁴⁵¹ Region 1 Force Human Trafficking Plans and Updates, Personal Communication, 22nd September 2015.

⁴⁵² Comments from a victim support NGO, Region 1 Focus Group, 24th January 2017.

⁴⁵³ Comments from an anti-slavery NGO, Region 1 Focus Group, 24th January 2017.

8.2 PRIORITISATION AND PROVISIONING

Both training and awareness raising activities were generally linked to either improving individuals' abilities to identify and refer potential victims or related to police investigations. Training and awareness activity around victim identification often covered areas such as understanding the nature of modern slavery, identifying indicators of victims and reporting channels, and training around the formal processes for reporting, and where appropriate preparing, initial NRM referrals with victims.⁴⁵⁴ Moreover, in several regions, specific emphasis was also placed on increasing intelligence throughput from organisations engaged with the modern slavery partnerships.⁴⁵⁵ The potential impact of training and subsequent impact of improvement in these two areas; victim identification and intelligence throughput, are discussed in later sections.

While training was offered broadly across each of the force regions studied, the actual nature of the training and the way, and by whom, it was delivered varied from place to place. Some covered areas and topics which could be considered more of an extension to awareness-raising activity; focusing on the signs and indicators of common forms of exploitation. Others provided more detailed and in-depth specialist police investigator training courses.⁴⁵⁶ Sometimes training was delivered by police to partners, while in other cases NGOs were contracted in to provide training for the police and other partner organisations.⁴⁵⁷ All five regions

⁴⁵⁴ Region 1 Modern Slavery Partnership Yearly Review for 2015; Interview with a statutory organisation representative, Region 2, 19th February 2018; Interview with a Police Detective Inspector, Region 3, 4th January 2017; Interview with a Police Detective Chief Inspector, Region 4, 9th March, 2018.

⁴⁵⁵ Interview with a Police Detective Sergeant, Region 1, May 6th 2015; Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018; Interview with a central government representative, Region 2, 19th February 2018; Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁴⁵⁶ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018; Interview with a Police Detective Sergeant, Region 1, May 6th 2015.

⁴⁵⁷ Interview with a Police Detective Inspector, Region 3, 4th January 2017; Interview with a central government representative, Region 2, 19th February 2018; Region 1 Human Trafficking Team Report January – June 2015, Personal Communication, 1st July 2015.

also cited general awareness-raising activity, around modern slavery within local communities, as a key activity where positive steps had been taken.

In terms of topics, training covered a number of different areas such as the national framework for victim identification and support - the NRM, to local victim-care models, specialist investigations material and guidance on conducting interviews with potential victims. In some scenarios training was completed face-to-face and over multiple days, while in others online e-learning modules were used.⁴⁵⁸ In some areas training was specifically funded by the police or the PCC, in others by existing community safety partnerships.⁴⁵⁹ Elsewhere, as in region three (rural north) it was conducted using mainstream resource on top of existing responsibilities and commitments.⁴⁶⁰ One exception to this funding trend was highlighted in region two (devolved), where criminal assets seized as part of slavery operations were being used to fund training initiatives in the region. In one such case, the money was used to fund the development of resources for schools by an NGO, in another case; the same money was used to deliver training to statutory organisations in the region.⁴⁶¹

Generally, cascading high-level materials on victim and exploitation indicators was seen as an important step in engaging people with the modern slavery agenda. Raising the profile of work within individual organisations was put forward in region four (rural south) as a means establishing a foothold to make the business case for more formalised and comprehensive training.

“So, you've got to get the awareness in to all the correct levels as the first priority in my view. And actually, the programme is definitely getting better in that regard so I've been able now to send a number of frontline investigators, you know DC's DS's and some PS's, you know sergeants,

⁴⁵⁸ Region 1 Police Human Trafficking Team Report January to June 2015, Personal Communication, 1st July 2015.

⁴⁵⁹ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018; Interview with a Police Detective Sergeant, Region 1, 7th September 2016.

⁴⁶⁰ Interview with a Police Detective Inspector, Region 3, 4th January 2017; Interview with a Police Detective Inspector, Region 3, 7th March 2018

⁴⁶¹ Interview with a central government representative, Region 2, 19th February 2018.

supervisors... out on neighbourhood teams on to training courses and awareness courses now [...] that there's been a real benefit I think.”⁴⁶²

When asked to appraise the value of training, responses generally indicated that there was a tangible sense that people, police and otherwise, now had a fairly good understanding of what slavery was and how they might come across it. Despite this, it was also recognised ubiquitously that this was not currently being translated into quantifiable outputs; such as increased intelligence throughput from non-police partners and increased initial referrals and MS1 (Duty to Notify) forms. A police officer from region four (rural south) elaborated on these issues:

“...Yes absolutely [there's been] an improvement, no doubt about that. But it's still not enough [...] our biggest problem is our intelligence gaps and we don't get enough intelligence in from anybody of the outside of the police.”

⁴⁶³

The same officer commented that he was trying to instil a culture of identifying things that “weren't quite right” among frontline officers – meaning that information could be mapped to modern slavery without necessarily always requiring that they make the initial connection to it or a specific form of exploitation.⁴⁶⁴

Overall, participants from across the five regions studied believed that stakeholders within their respective force areas had a better understanding of the modern slavery problem, but that work was still to be done to translate this into measurable outcomes. Participants seemingly made this assertion based on two measures. 1) the amount of people that had received training in their region, and 2) increasing numbers of initial NRM referrals. However, there was no real way of establishing causality in this regard, and as one participant remarked in reality it was “quite difficult to pin down [reason(s) for] the rise in actual numbers.”⁴⁶⁵

⁴⁶² Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁴⁶³ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁴⁶⁴ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁴⁶⁵ Interview with a police Detective Chief Inspector, Region 5, 18th July 2018.

“I think that we have a better grasp of what’s happening, we don’t have an infallible understanding of what’s happening. But there are things in train that would hopefully increase our understanding and improve our understanding, but a lot of it is still in development.” ⁴⁶⁶

In region two (devolved), where training was the most coordinated and widespread, there was still a recognition that an approach based on a thorough needs-assessment was needed within the public sector in order to identify and address gaps. This respondent stressed that while central government could set the agenda, the ultimate safeguarding responsibility remained with the other statutory organisations themselves, particularly the health and social care trusts, and that these organisations needed to take greater responsibility for their own training needs. But there was still a perception that the region was “learning as it went on” to identify different needs, and key areas where statutory practitioners were perceived to be most likely to encounter victims. ⁴⁶⁷ It was similarly acknowledged in region two that the dissemination of training was not strategic; particularly in relation to the health and social care sector, but plans were in place to develop a training plan that covered the entire region, and delivered by a centrally funded role.

In region five (coastal south) the scope of activity was taken beyond those directly engaged with partnerships. Police reported having visited hotels and bed-and-breakfasts in the region to conduct prevention work that aimed to raise awareness of context specific risks that they may encounter, with hotels receiving an informal ‘certificate’ of awareness in return for their cooperation. ⁴⁶⁸ Common risks included where patrons insisted on paying for rooms in cash, (presumed) couples with large age differences – particularly with an older male checking in, or rooms that appear to have multiple different and frequent male visitors.

⁴⁶⁶ Interview with a central government representative, Region 2, 19th February 2018.

⁴⁶⁷ Interview with a central government representative, Region 2, 19th February 2018.

⁴⁶⁸ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018.

In region two (devolved), specific issues around the potential for labour exploitation in agricultural settings, and awareness raising was conducted with the national department of agriculture, and agricultural training colleges.⁴⁶⁹ This type of work hoped to bring benefit in a preventative capacity; raising cognisance of issues such as pop-up brothels in hotels and the exploitation of, primarily, migrant labour in the agricultural sector.

Across all regions, training and awareness-raising work frequently targeted frontline practitioners – particularly those within statutory organisations, and their ability to recognise and identify possible victims.⁴⁷⁰ Generally however, it was believed that more could be done with the general public to encourage and raise awareness of issues within potentially vulnerable communities in particular. Due in part to resourcing, and as a result of fractured, or a complete lack of, existing relationships with certain communities these initiatives were either not in place or were unsuccessful. Efforts were hindered by existing tensions with the police from within sex-work and certain migrant communities. Police and other participants across the regions studied reported concerns that groups within their areas were simply not aware of the problem or did not consider the possible presence of potential victims in their respective communities; be they based on religious background, nationality or occupation.

“Do you think we delve deep enough into the communities we’re involved in, to be able to get that intelligence in... from a law enforcement point of view? I sort of say that it’s the victims, witnesses, suspects, its members of the public that will provide us with the information about the people that are committing these offences.”⁴⁷¹

“Bringing them [communities] all together for greater understanding [should be a priority]. Because I think, I think probably they are sort of at

⁴⁶⁹ Interview with a central government representative, Region 2, 19th February 2018.

⁴⁷⁰ Region 1 modern slavery partnership yearly review for 2015, Personal Communication, 1st January 2016.

⁴⁷¹ Comments from a UK Immigration Enforcement Representative, Region 1 Focus Group, 24th January 2017.

the end of the queue when it comes to training aren't they, but they're the people that are actually out in those communities seeing things that perhaps we're not seeing, so I think we need to be out there pushing them up the queue. And to make sure that they are highlighting it.”⁴⁷²

These were highlighted specifically as challenges with migrant communities and sex-workers, both of which have histories of mistrust and friction with authorities, and both of which are considered communities who are at-risk of exploitation. It was also perceived that this was an area where police needed help; that existing frictions and perceptions meant they were not ideally placed to 'go in' and raise awareness. Instead, charities working with those communities directly were often sought out as potential mediators – particularly in circumstances where they worked specifically with at-risk groups such as sex-workers outside of the anti-slavery agenda.

Another issue surrounded the questions as to whether possible connections between other safeguarding issues, such as child neglect, were in the consciousness those within designated safeguarding responsibilities (safeguarding leads) in local authorities;

“So, when you're looking at early help for children and neglect, whether or not the links are being made within social care to actually consider that the parent or the carer within that family unit might be a victim of trafficking. And I don't think that's even on the radar.”⁴⁷³

This is a view shared by the findings of the Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) inspection which cited general problems surrounding the premature closure of cases. In a number of cited instances potential victims had gone unidentified and, in some cases been deported due to a general lack of understanding as to the manifestations of

⁴⁷² Comments from a Local Authority Safeguarding Lead, Region 1 Focus Group, 24th January 2017.

⁴⁷³ Comments from a Local Authority Safeguarding Lead, Region 1 Focus Group, 24th January 2017.

modern slavery and wider issues of vulnerability.⁴⁷⁴ This is problematic. The following quote from a government organisation speaking in region one (large metropolitan) alludes to the fact that often the initial piece of intelligence can bear no reference to, or serve as an indicator of, modern slavery.

“What we’ve found from the last day and a half is that sometimes with the information and intelligence coming in around things like anti-social behaviour, and over occupied houses, is that the only information they get.”⁴⁷⁵

This emphasises, on the one hand, the disparate nature and potential reach, in terms of impact, that modern slavery has on its victims; but on the other hand, it also highlights the challenge of delivering training to frontline professionals on the multitude of possible situations and potential indicators that they may encounter. This raises the related issue of whether it is possible that training and awareness campaigns are currently too narrowly focused on issues that are considered ‘low hanging fruit’? These issues include widely recognised problems such as labour exploitation in nail-bars and hand-car washes, pop-up brothels where forced prostitution is believed to be commonplace and forced criminality through cannabis cultivation.⁴⁷⁶

The emerging issues of ‘county lines’ crime in the UK is further evidence of this. In region four (rural south), one police participant used the example of county lines to emphasise the need for cognisance and understanding of crime that falls outside the ‘low hanging fruit’ issues of labour exploitation through business types such as nail-bars and car-washes.

⁴⁷⁴ HMICFRS, “Stolen Freedom: The Policing Response to Modern slavery and Human Trafficking,” 2017, www.justiceinspectorates.gov.uk/hmicfrs; Jamie Grierson, “How Police Miss Chances to Investigate Modern slavery,” The Guardian, 2017, <https://www.theguardian.com/uk-news/2017/oct/24/how-police-miss-chances-to-investigate-modern-slavery>.

⁴⁷⁵ Comments from a central government representative, Region 1 Focus Group, January 24th 2017.

⁴⁷⁶ Interview with a Police Detective Inspector, Region 3, 7th March 2018.

“We had somebody doing... moving into somebody else's house and getting the people in there to and beg for them and they're receiving their benefits a getting them to deal drugs. So we charge that person with a modern slavery offence. Because they were forcing them to carry out criminality, they were getting them to move carrying out begging activity which is trafficking. So we've got to get beyond the public's and some partner's misconceptions that this is about trafficking foreign nationals in and around the country, into the country and around the country to work in car-washes and nail-bars. It's much more broad than that [sic].”⁴⁷⁷

Can training and awareness schemes evolve to be more effective in unpicking the true nature and scope of the exploitative behaviour that effectively allows victims to be controlled by their employer or trafficker? Those delivering training should seek to raise awareness of how these issues manifest as visible victim indicators, so that connections can be made between modern slavery, and emergent issues such as county lines. The seeds of partnership working in region one (large metropolitan) and the eventual needs assessment for training were initially sewn as a result of a large operation that was initially recorded and investigated as an instance of kidnapping.⁴⁷⁸ But can we say with confidence that these connections are being made everywhere?

In region three (rural north), a more remote force area with little dedicated resource on modern slavery, proposals were put forward to overcome these issues by framing modern slavery in the region more broadly under the banner of ‘vulnerability’ in order to ensure modern slavery retained its position as a priority area amid other competing crime portfolios. In this area, one police respondent was working to establish a team around this idea of vulnerability, encompassing issues such as CSE, domestic abuse, abuse of the elderly, etc.

“There may be a 50% chance that we have some sort of vulnerability team set up. But will it be exclusively modern slavery? ... probably not but if I can

⁴⁷⁷ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018.

⁴⁷⁸ Interview with a Police Detective Constable, Region 1, 6th May 2015.

talk around well, you know, child sexual exploitation is part of modern slavery, a lot of our missing from home's are at risk of CSE so you can... if you can paint a picture you might get a vulnerability team as opposed to a modern slavery. And that I think would really drive it forward.”⁴⁷⁹

This view was also to some extent reinforced by comments from region five (coastal south), a similarly rural area, where it was commented that the nuance and overlap between modern slavery and crimes like CSE created confusion among frontline police. As a result, emphasis was being placed on identifying and mitigating vulnerability generally when potential victims were encountered, rather than, at the initial point-of-contact at least, being overly concerned with “which pot it sits in.”⁴⁸⁰

8.3 RESULTS AND RECEPTION

While training and awareness-raising activities were ubiquitously and visibly rolled out across the regions in the study, police respondents stated that the direct implications of that training were not always clear.⁴⁸¹ In region one (large metropolitan) however strategies which targeted the areas of awareness, education and training among the police and partnerships were attributed to significant initial increases in the amount of intelligence throughput on modern slavery during the first 6 months of 2015.⁴⁸²

This was seen as a promising initial step. However, additional attention to measures to ensure that the new information is absorbed, ingrained and put in to practice by the force and districts is needed. The priority of ensuring that SPOC's from each of the districts, and each of the partner agencies was fulfilling their role

⁴⁷⁹ Interview with a Police Detective Inspector, Region 3, 7th March 2018.

⁴⁸⁰ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018.

⁴⁸¹ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018; Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁴⁸² Force Human Trafficking Plans and Updates, Region 1, Personal Communication, 22nd September 2015.

and had the knowledge available from this new intelligence remained a key challenge area. After initial spikes, the information received through from partners was also seen to drop off significantly in the region, but still remained higher than figures from before training was rolled out.

To put the scale at which training was disseminated into perspective, by September 2015, nine months after the initial prioritisation of modern slavery by the force in region one (large metropolitan), more than two thousand police officers and staff had received face-to-face training on the subject across the region one, and more than three times that had completed online training through the force training system.⁴⁸³ The initial training content aimed to raise general awareness and provide information on indicators as primary points of focus. However, one of the challenges associated with the actual rollout of training was understood to be the fact that, for non-statutory organisations in particular, voluntary buy-in was needed on behalf of the organisations and individuals themselves in order to actually drive attendance, which was not always present.

“As with much of the information available to forces and districts, it is reliant on the individual’s appetite to seek out information as opposed to being fed to them through formal training mechanisms or best practice models.”⁴⁸⁴

Despite this, the rollout of training amongst partnerships in region one appeared to be keenly met across in four of the five force districts.⁴⁸⁵ In addition to more general training and in-force awareness-raising, specialist sessions targeting divisional police contact points were also held. These sessions provided more focused training aimed at improving the quality of investigations and raising the knowledge held around the potential connections between CSE cases and modern

⁴⁸³ Force Human Trafficking Plans and Updates, Region 1, Personal Communication, 22nd September 2015; Interview with Police Detective Sergeant, Region 1, 16th March 2015.

⁴⁸⁴ Interview with a Police Detective Sergeant, Region 1, 18th June 2015.

⁴⁸⁵ Anti-slavery Network Meeting Minutes, Region 1, Personal Communication, 11th March 2015.

slavery, putting specific focus on issues of safeguarding.⁴⁸⁶ In addition to the direct training of individual staff across the police and partnering agencies, work around raising the level of awareness within communities themselves was also completed. Through mechanisms such as posting leaflets and posters in community hubs such as schools and doctor's surgeries, all forces, sought to reach out via their newly founded partnership networks and engage with the communities - particularly those thought to be specifically vulnerable - in order to establish a baseline of education and awareness around the subject among the public.⁴⁸⁷

Of course, the ability to discern a complete and detailed understanding of the true nature and scale of modern slavery everywhere is unlikely and it remains a relative impossibility for every individual citizen to fully understand every indicator and the modus operandi linked to them. Despite this, there remains scope for widespread improvement. Feedback from across the regions suggests that the interventions employed resulted in a significant improvement in knowledge around the crime.

The resulting impact of training, and subsequent initiatives and events that followed in region one, was an improved perception among partners, particularly those which are themselves involved in some capacity in dealing with modern slavery, that regional knowledge, particularly recognising that which exists within the police itself, that skills and knowledge had developed significantly around the subject area.

“...and in terms of knowledge, I think the ‘Region one’ force have far superior knowledge, about modern slavery, than other forces around the UK. If you contact them they understand what you’re trying to say to them

⁴⁸⁶ Force Human Trafficking Plans and Updates, Region 1, Personal Communication, 22nd September 2015.

⁴⁸⁷ Force Human Trafficking Plans and Updates, Region 1, Personal Communication, 22nd September 2015.

and they do respond in an appropriate manner, and as you've just said they do give guidance and assistance.”⁴⁸⁸

While the rollout of mandatory training across the force facilitated significant strides being taken in regard to upskilling, the consumption of additional materials to support this ongoing development remained a largely voluntary endeavour, and not something that existed as part of a recognised formal training model or best-practice framework. However, consumption of additional materials relied on investigators individual desire to seek them out.⁴⁸⁹

At a more general level, forces also sought to leverage the media to highlight successful operations and to improve the public consciousness on contemporary slavery as a part of a coordinated 'media and marketing campaign' designed to raise awareness and ultimately prevent offences.⁴⁹⁰ These national media driven measures were implemented alongside more targeted campaigns aimed at “voluntary groups, schools, employers, elected members, doctors, shops, benefits offices and landlords” to promote the reporting of 'soft intelligence' with the police.⁴⁹¹

⁴⁸⁸ Comments from a local victim support NGO, Region 1 Focus Group, 24th January 2017.

⁴⁸⁹ Interview with a Police Detective Sergeant, Region 1, 18th June 2015.

⁴⁹⁰ Local Area Human Trafficking Action Plan 2015, Region 1, Personal Communication, 17th June 2015.

⁴⁹¹ Police Human Trafficking & Modern Day Slavery Action Plan 2015 – 2016, Region 1, Personal Communication, 21st September 2015.

Key Findings:

- Across all regions, a variety of activity that could be linked to the key areas of raising awareness and training among practitioners was evident.
- The exact nature of this activity varied from place to place; as did the topics covered, the means of funding, and the organisations delivering it.
- Little distinction was made between raising awareness of modern slavery and its indicators, and more formal rigorous training exercises and the lines between general awareness campaigns and practitioner training were not always explicitly acknowledged. Though some areas did specifically cite rollout of specialist courses for police investigators.
- Work was found to be largely input focused. However, respondents generally attributed to the rollout of training and awareness raising work to increases in initial NRM referrals in their areas.

There is no quick fix for these issues. However, a general lack of awareness publicly tied with the historically limited understanding of modern slavery means that, until extremely recently, the issue has had little presence in the public consciousness. Awareness campaigns, such as those that have been seen for problems such as domestic violence could help in this regard, and positive steps have been taken with recent campaigns surrounding the risks associated with hand-car washes highlighting specific issues. While specialist training for police and frontline partnership staff should also improve responses and increased the quality and quantity of victim identifications and referrals. Without proper and

formal mechanisms to ensure that frontline and other staff are made sufficiently aware of the challenges associated with modern slavery, there is a certain risk, and potentially inevitability, that if left unchecked will allow the problem to continue to grow within communities and continue to threaten the reputation of those organisations responsible for victim safeguarding and bringing those who choose to perpetrate it to justice.⁴⁹²

There is also the problem of competing agendas. The modern slavery agenda at large has benefitted greatly from an increased national push since 2015, and the introduction of the Modern Slavery Act – attributed as one of the main reasons for the surge in prioritisation and partnership working. But this is a finite window that must be taken advantage of. The police, local authorities and other statutory organisations will have to cope with changing agendas in the coming years, and so must make the most of the opportunity made as a result of modern slavery's current position in the national consciousness. The UK's Independent Anti-Slavery Commissioner (IASC) however should, to some extent be able to fulfil a role in ensuring the continuity and continued interest in slavery.

With recognition that training needs extend beyond senior and other investigating police officers, it's acknowledged that greater levels of cohesion are needed with the College of Policing to identify and prioritise those who might not otherwise receive training; such as the CPS, public sector frontline workers and beyond.

⁴⁹² 'Threats' Prevent Pursue Notes, Region 1, Personal Communication, 11th January 2016.

9 INFORMATION AND INTELLIGENCE SHARING

“Well I think there is still a bit of the unknown, it’s kind of shrouded... you don’t see everything.” ⁴⁹³

The previous chapter highlighted recurring issues associated with the clarity of understanding that surrounds contemporary forms of slavery, and measures to address it. The crime has had historical and pervasive issues with under- and misreporting. These issues continue to contribute to the ambiguity of understanding around the true prevalence of modern slavery that exists today - the ‘dark number’. This chapter builds upon this to investigate if, and how, efforts to improve understanding of modern slavery generally are being translated into tangible efforts to improve local understanding of the incidence and threat of exploitation in particular areas. Particularly, it looks at how partnerships can play a vital role in ‘localising’ the modern slavery issue, translating general awareness of what modern slavery is and the ways in which people are exploited, through to a local appreciation of risk and vulnerability that can be used to drive tangible action to prevent and investigate issue, and to identify and safeguard potential victims.

The chapter while showing a number of novel examples of how partnerships are being used to improve, these were often different to statutory reporting and intelligence measures – such as insufficient use of the duty to notify provision, previously flagged in the Haughey and Stolen Freedom reports as significant issues. ⁴⁹⁴ While efforts discussed in chapter 8 did show that training and awareness raising work was being conducted across statutory organisations to improve formal data recording – the measures discussed in *this* chapter focus on issues separate to those identified in the Haughey and Stolen Freedom reports, and in particular on the role of non-statutory partners in helping to build understanding of local issues and flag additional at-risk areas.

⁴⁹³ Interview with a central government representative, Region 2, 19th February 2018.

⁴⁹⁴ Haughey, “The Modern Slavery Act Review: One Year On”; HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking.”

9.1 INCIDENCE AND UNDERSTANDING

Looking locally at the development of targeted interventions that attempt to address specific local challenges, there are indications that the unknown ‘dark-number’ of unidentified potential victims, and limitations in the general appreciation of the scope and nature of exploitation are exacerbated by systemic deficiencies in the reporting infrastructure of police and other agencies. Combined with the crime’s general clandestine nature, the reasons why it is widely believed that the true scale of modern slavery is far worse than current figures indicate begin to become apparent. Such failings make it possible to draw parallels with the high-profile issues that have plagued criminal justice responses to Child Sexual Exploitation (CSE), and the contents of the independent enquiry into CSE led by Justice Lowell Goddard, and subsequent reports by Casey.⁴⁹⁵ These enquiries indicated that, if appropriately acted upon, existing information held by statutory agencies could have assisted in the recovery of victims, and in a number of instances have prevented further abuse.

The prominent policy positioning of modern slavery itself – in part due to the implementation of the Modern Slavery Act 2015 - increased media attention and awareness raising schemes ran at national and regional levels by the national crime agency and regional policy forces have contributed to perceptions that the prevalence of modern slavery is increasing. The raised profile and national prioritisation, from a policing perspective, was perhaps most prominently thrust into the public consciousness during, future Prime Minister, Theresa May’s time as Home Secretary between 2010 and 2016. These antecedents have endured

⁴⁹⁵ Louise Casey, “Report of Inspection of Rotherham Metropolitan Borough Council,” 2015, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/401125/46966_Report_of_Inspection_of_Rotherham_WEB.pdf; Alexis Jay et al., “Sexual Abuse of Children in Custodial Institutions: 2009-2017 Investigation Report,” *Independent Inquiry Child Sexual Abuse*, 2019, <https://www.iicsa.org.uk/reports/cici>; Threats: Prevent, Pursue Notes, Region 1, Personal Communication, 11th January 2016.

through to 2017, and piqued national interest has led to the inspection of a sample of forces to see and evaluate the different approaches being taken across the UK to upscale response and prevention efforts.⁴⁹⁶ The inspections build on existing assessments centred around safeguarding, and in particular the issues surrounding CSE, broadening the scope to cover the depth of criminality and exploitation that is linked to and stems from modern slavery (under the definition of the Modern Slavery Act 2015) to ensure that forces remain accountable and are implementing measures to ensure the effectiveness of their responses.⁴⁹⁷

Certainly, the profile of modern slavery has been raised and in many areas the appreciation and understanding, a well-established challenge identified in this study as well as elsewhere, continues to improve. There is also little doubt that macro conditions discussed in the thesis introduction (p.20) - such as the well-trodden issues of neoliberalism, free movement in the EU, the UK welfare system and others continue to have a profound impact in causing the precarity that places many at risk of exploitation. Furthermore, recently released figures by the International Labour Organisation (ILO) and Alliance 8.7, a global coalition of countries and partner organisations aiming to eradicate contemporary forms of slavery, indicate that globally the number of people enslaved is greater than ever before, although the proportion of people compared to the overall global population is at its lowest ever.⁴⁹⁸

However, caution must be expressed not to misinterpret, or even confuse, promising increases in victim referral, intelligence throughput and the numbers of active criminal investigations with an increase in slavery's actual prevalence. Instead, increases in the amount of 'visible' slavery – in terms of the metrics mentioned in the previous sentence, are more likely a reflection of the increased

⁴⁹⁶ HMICFRS, "Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking."

⁴⁹⁷ Comments from a central government representative, Region 1 Focus Group, January 24th 2017; Letter to Police Chief Constables from the Independent Anti-Slavery Commissioner, Personal Communication, 22nd January 2015.

⁴⁹⁸ International Labour Organization, "Global Estimates of Modern Slavery: Forced Labour and Forced Marriage."

attention, interest and action taken by key practitioners and partnerships in response to slavery's prominent policy positioning.

9.2 THE SCALE AND NATURE OF MODERN SLAVERY IS NOT WELL KNOWN

The previous chapter identified the widespread rollout of awareness raising and training across the statutory sector means that the pervasive narrative that 'we simply don't understand slavery' is potentially shifting. In fact, simply increasing recognition of the modern slavery issue was seen as a key priority established across the regions studied, something that frequently came up within police intelligence assessments, action-plans and other documentation. These sought to establish a better understanding of "what is known within force, highlighting any gaps and making recommendations as to how they can be filled and how this could be achieved."⁴⁹⁹

From a policing perspective, one of the key benefits of partnerships was their potential to be a source of information, and in some cases actual intelligence on what was happening in the communities with which partners interact – particularly ones where police did not have a history of working with successfully. Intelligence acquisition was also considered to be vitally important in improving understanding both nationally and within specific regional and local areas. This involved frontline workers from across the public sector spectrum, in addition to NGOs – particularly those working directly with potentially vulnerable groups.⁵⁰⁰ This is somewhat atypical. Police partnership work with other organisations has historically focused on safeguarding issues, and while this remains a core element of ant-slavery partnership work, police were unusually forthcoming about the benefits of partnership work as an intelligence collection exercise.

⁴⁹⁹ Trafficking in Human Beings Baseline Assessment, Region 1, Personal Communication, August 2013.

⁵⁰⁰ Open Rights Group, "ROCs and GAIN," Open Rights Group Wiki, accessed May 24, 2018, https://wiki.openrightsgroup.org/wiki/ROCs_and_GAIN.

Training aside, other factors, such as the absence of specific means to mark intelligence as being specific to modern slavery (referred to as intelligence flags), absences in the infrastructure and funding needed to facilitate partnership and community engagement work and subsequent issues in the amount of ‘trickle down’, and ‘trickle up’, of information from statutory bodies, other organisations and frontline workers continued to contribute to gaps in the intelligence picture and broader understanding - inhibiting efforts to effectively identify and support potential victims.

The following case study from region three (rural north) summarises some of the challenges being faced in this regard, in addition to highlighting some additional areas of focus relating to intelligence.

Example 2: Understanding the local problem in region three (rural north)

The focus in region three actually began not with a discussion of the challenges related to ‘primary’ information derived through partner organisations and the police themselves, but with secondary information published by organisations such as the GLAA and NCA. This information, it was stated, was considered hard to put into regional context due to its national focus. For instance, a police respondent commented on then recently published figures from the GLAA suggesting that there were 150,000 people currently at high-risk of labour exploitation in the UK.

“...as a rural county does that mean that we’ll have a greater proportion of that 150,000 or does the fact that we don’t have any large urban areas mean that we’ll have less, a smaller proportion, of that 150,000? Its questions like that which we have got no idea about.”⁵⁰¹

Further comments however made it clear that although there was confusion around what can actually be taken from some national figures, the high-level

⁵⁰¹ Interview with a Police Detective Inspector, Region 3, 4th January 2017.

information provided was actually probing further investigation and deeper thinking into how the issue, evident at a national level, was actually manifesting more locally, considering the geographic and socio-economic factors, such as type and availability of work and labour, that are understood to have an impact on the nature of slavery.

Specifically, in response, police had elected to undertake streams of work around sex work and agricultural labour due to the high volume of these activities in the region, and their possible connections to exploitation. Thinking had gone into establishing how known information; such as numbers of sex-work advertisements on websites like Vivastreet, a popular classified advertisement site, could be utilised to stimulate proactive engagement with the modern slavery issue; both from the point-of-view of the police, but also from a partnerships standpoint and fostering broader engagement with organisations that have a role to play in tackling those respective abuses. However, there was acknowledgement that although lots of ‘thinking’ had taken place, appreciation of the scale and nature of problems remained speculative and wider organisational commitment, in terms of resourcing.

Despite this, various ‘grass roots’ initiatives had been undertaken to increase understanding. First, referring back to sex work specifically, an intelligence analyst was tasked to map the numbers of possible foreign nationals advertising sex work online in the area based on suggestions from the UK Network of Sex Work Projects (UKNSWP), also known as the National Ugly Mugs Scheme, that suggested up to 15% of migrant sex workers were being exploited.⁵⁰²

There were also other emerging examples of proactive practice looking into local manifestations of problems acknowledged at a national level; such as Vietnamese ran nail-bars, as a potential venue of exploitation.

⁵⁰² Nicola Mai, *Migrant Workers in the UK Sex Industry: Full Research Report ESRC End of Award Report, RES-062-23-0137* (Swindon: ESRC, 2009), <https://www.researchcatalogue.esrc.ac.uk/grants/RES-062-23-0137/outputs/read/969bd499-4954-41ff-8d08-391e1a6c932b>.

“I was just speaking to the National Crime Agency yesterday to try and find out, you know, what is the evidence base to suggest that Vietnamese nail-bars are a source of illegal immigrants, money laundering and organised crime groups to give us the confidence then to go to these nail-bars and have some kind of inspection regime. And again, then with that inspection regime who, what does that look like, is it us, is it HMRC, is it immigration. Are we going from an immigration point of view, or are we going from a victim safeguarding point-of-view. So that’s where we are at the moment [...] we have an idea and its now trying to translate that into tangible activity on the ground to help us best understand the nature and scale of modern slavery.”⁵⁰³

The case study touches upon a number of challenges evident across the regions studied; not just isolated to region three. It highlights that the risk posed to specific groups and communities, and risk posed by specific forms of exploitation largely remain an unknown quantity; particularly within local contexts. While improvements to the levels of awareness surrounding the indicators of modern slavery, the reporting infrastructure and other measures have increased understanding significantly around certain areas, others remain hidden. Issues such as indoor sex work, and the extent to which those involved are exploited as victims of modern slavery continue to contribute to the unknown ‘dark number’ of victims from the national picture.⁵⁰⁴

The literature reinforces these issues with the capture and recording of crime and intelligence, and as a result there is clear and explicit acknowledgement that a real and significant knowledge gap remains in this area. This gap refers to the clarity of understanding regarding how contemporary slavery manifests, its indicators, and the activities and criminality to which it is linked. A number of factors can be attributed to this. These include; a failure to recognise that there is a modern

⁵⁰³ Interview with a Police Detective Inspector, Region 3, 4th January 2017.

⁵⁰⁴ Comments from a sex-worker support NGO representative, Region 1 Focus Group, 24th January 2017

slavery problem to start with, a failure to understand what it is, a lack of reporting, misreporting, and a failure to appropriately investigate crimes that are captured resulting in un-investigated and unreported allegations of contemporary slavery.⁵⁰⁵ The following excerpts taken from an intelligence profile, developed in region one (large metropolitan), and a police interviewee in region two (devolved) highlight this.

“Low crime and intelligence submissions in *Local Area X* and *Local Area Y* could be giving a false impression that there isn’t a sexual exploitation problem in those areas.”⁵⁰⁶

“[...] my argument has always been that well its always going to be low until people know what modern slavery is, knowing that it is a priority, knowing the signs, knowing the symptoms, what are the indicators, so I would hope that now the training has finished that our intelligence submissions over the next 12 months will be more than what they have been up until now.”⁵⁰⁷

A popular narrative from those interviewed across all regions, as well as wider discourse around modern slavery in the UK generally, talks of the failure to ‘turn over the stone’.⁵⁰⁸ It was anecdotally mentioned in region three and four, when police activity related to modern slavery was either absent or in its infancy, there was a tendency to say that slavery was not a problem in their respective geographical areas.⁵⁰⁹ This meant that any incident that emerges, or individual identified that may exhibit indicators of an enslaved or trafficked victim are likely to be missed, crimes not recorded, and intelligence not actioned, and in some cases not captured at all. In region one, the major police investigation attributed with sparking interest and increased activity in response to modern slavery was

⁵⁰⁵ Police Threats: Prevent Pursue Notes, Region 1, Personal Communication, 11th January 2016.

⁵⁰⁶ Human Trafficking for the purposes of Sexual Exploitation profile, Region 1, Personal Communication, 12th November 2015.

⁵⁰⁷ Interview with a Police Detective Inspector, Region 3, 4th January 2017.

⁵⁰⁸ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁵⁰⁹ Interview with a Police Detective Inspector, Region 3, 4th January 2017; Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

initially being investigated as a kidnapping. Only after further investigation were the connections to modern slavery made, leading to a branching operation that eventually identified dozens of labour exploitation victims across the region.

Other issues also exist. While, often, a significant amount of intelligence is collected, and crimes *are* more commonly recorded, there are still endemic problems with collection and recording in general. The aforementioned knowledge gaps of frontline workers both from within the police and other statutory and non-statutory organisations, such as the local council, housing authorities, NHS workers, job agencies and the fire service mean that crime and intelligence related to modern slavery are often missed outright, and the duty to notify is not met.

“There is a perception that Northern Ireland are very good at it [crime recording], other forces less so. So, can we look at, and study, what is being done in areas with different levels of rurality to see if it is transferable.” ⁵¹⁰

Statistics, intelligence submissions and crime numbers can also be warped from area to area based on other factors. For example, in one division within the primary case-study the presence of a concentration of ‘VICE’ officers, with a remit for the investigation of prostitution related crimes; including those with potential victims who are trafficked or coerced, meant that the identification of sex workers who may be victims of contemporary slavery can be seen to look disproportionately higher than in other areas.

“Between 1st October 2013 and 30th September 2014 there were 10 offences recorded of keeping/managing a brothel, 9 offences were in *local district A* and 1 was in *local district B*. Showing a year on year increase of 80%. It should be noted that unlike other districts, *local district A* have a VICE team who have historically been proactive in checking ‘Adult Works’ and making arrests. This is likely to explain the disproportionally high

⁵¹⁰ Interview with a Police Detective Inspector, Region 3, 4th January 2017.

number in *local district A*, not that other districts do not have as many brothels.”⁵¹¹

While recent high-profile incidents have resulted in huge pushes to raise awareness of issues such as CSE, domestic abuse and now knife crime, the knowledge around how to effectively identify and manage modern slavery issues still varies greatly, and public awareness is not necessarily at the same level as for those other issues. Perhaps due to the variety of exploitative scenarios victims, national media campaigns have not been seen on the same scale as those related to domestic abuse and knife crime in particular.

Looking generally at region one (large metropolitan), the issues associated with modern slavery were correctly identified by Police as areas likely to increase in prominence and ones that would attract greater attention from the public and media as more work was being done proactively identify victims and ‘at-risk’ businesses. As a result of the potential scale of the work involved, it has been widely acknowledged actions must be taken across force to ensure that there is capability and capacity to respond to requests effectively in order to avoid the potentially damaging implications both on the victims involved and on the force’s reputation of failing to respond accordingly.⁵¹²

As identified extensively through the literature and ongoing work discussed in earlier chapters, despite the best efforts and estimations of practitioners and researchers alike, the true scale and specific nature of modern slavery is simply not known. The breadth and depth of exploitation and crime that can stem from an individual or group of victims, or from the organised crime groups involved is vast. Not only are victims often directly physically and psychologically exploited for purposes such as forced labour and sex, these activities are often fronted by legitimate businesses, themselves used to launder money acquired by illicit activities such as the aforementioned exploitation and through other means such

⁵¹¹ Human Trafficking for the purposes of Sexual Exploitation Problem Profile, Region 1, Personal Communication, 12th November 2015.

⁵¹² Trafficking in Human Beings Baseline Assessment, Region 1, Personal Communication, August 2013.

as the fraudulent claim of benefits on the behalf of victims. Despite the perception of it as an unknown quantity, it is widely regarded that specific issues, at all levels; locally, regionally, nationally and internationally, vary greatly according to geographic context. The factors that affect this context, such as the availability of particular types of work, housing prices and others, have a profound impact on the nature of the exploitation taking place as a result of the demand for different types of labour, domestic workers and forced prostitutes.

“Across the UK forced labour is consistently low paid, low skilled work, commonly in areas such as agriculture, construction, food processing, cleaning and care. West Yorkshire Police crime data supports this national trend toward ‘blue collar’ employment. Within Region one, factory work is the most frequent employment type where forced labour is employed, construction is the second most popular form of employment. Unlike the rest of the country agriculture and care work does not feature”.⁵¹³

Furthermore, there are trends towards the exploitation of individuals from different communities in different ways, with different concentrations of groups evident from one place to the next. For an example, there may be a trend towards the presence of Roma traveller communities in suburban and rural areas where there is higher availability of agricultural work, whereas other groups may concentrate in urban areas making them more prone to exploitation in the service industry – such as hand car-washes or nail-bars. The following example from the one district in region one highlights how Hungarian nationals appear to be at higher risk of labour exploitation.

“There is a disproportionately high volume of Hungarian nationals involved in forced labour, particularly in the x area. It is not known at this stage if there is an inflated risk of exploitation to individuals living within the Hungarian communities in locality a, locality b and locality c or whether the statistics have been skewed by effective investigations involving Hungarian

⁵¹³ Reasons for Forced Labour, Region 1, Personal Communication, 24th July 2015.

citizens in those areas in investigations such as Operation 'Townhome'."

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This example also further highlights the implications of a skewed intelligence picture which were first discussed in the earlier literature review, showing how certain communities, crime, and exploitation types can be disproportionately represented as a result of success operations.

"The districts within region one experiencing the most offences are area a, area b and area c. These are all traditionally areas that have a rich history within manufacturing. These areas also offer cheap housing stock for workers to be housed. Although area d is not unaffected by forced labour, it is lower than expected given its size and economy. This is possibly due to the higher cost of accommodation in area d and more 'white collar' industries within the city itself. However, human trafficking officers are finding new intelligence that some victims are residing in poorer areas of the area d district but are being driven to work in region three in agriculture." ⁵¹⁵

⁵¹⁴ Reasons for Forced Labour, Region 1, Personal Communication, 24th July 2015.

⁵¹⁵ Reasons for Forced Labour, Region 1, Personal Communication, 24th July 2015.

9.3 CAPTURING THE MISSING INFORMATION AND INTELLIGENCE

Issues connected to gaps and perceived challenges with information and intelligence sharing were also highlighted across participating regions, and also as an area where anti-slavery partnerships were seen, in some areas, to be having a distinctly positive impact. Region one (large metropolitan) had implemented region wide initiatives to encourage and facilitate the sharing of what became referenced as ‘soft intelligence’. This intelligence, primarily from frontline workers, including representatives from local authorities and NGOs, contained information concerning potential instances of modern slavery.⁵¹⁶

“We’re trying to set up one [an intelligence submission system] in *local area X* where it’s the gut feeling, but that is aimed at frontline workers... And that is on our action plan in relation to, so we know it’s an area and were working, it’s how we do that, and how we make it easy for people to get that information in. Because at the minute there is no easy way of doing it to be honest”.⁵¹⁷

Issues around potential residential over-occupancy were specifically cited as one area where soft-intelligence submissions had helped to successfully identify a number of potential modern slavery victims.⁵¹⁸ At the time of interview a similar scheme was also in the process of being implemented in region four.⁵¹⁹

These provisions, designed to enable information to be submitted to the police more easily, included local email inboxes and a dedicated phone line with answering machine that was monitored daily, alongside increased promotion of the national modern slavery helpline. Separate provisions were also being made to work alongside banks to flag fraudulent financial activity that may be occurring

⁵¹⁶ Modern Slavery Partnership Yearly Review for 2015, Region 1, Personal Communication, 16th February 2016.

⁵¹⁷ Comments from a local Community Safety Partnership Representative, Region 1 Focus Group, 24th January 2017.

⁵¹⁸ Interview with a Police Detective Sergeant, Region 1, 7th September 2015.

⁵¹⁹ Interview with a police Detective Chief Inspector, Region 4, 9th March 2018.

as a result of slavery.⁵²⁰ These efforts contributed to a rise in intelligence throughput within region one between 2014 and 2015 of more than 55% in the first year of the partnership's implementation.⁵²¹ Naturally, such initiatives were seen to follow the positive work taking place in terms of training, and increasing frontline staff's awareness of modern slavery; informing them of the indicators and instilling the confidence needed to report any suspicions or information of interest. In region four (rural south), a proforma was created to allow partners to submit information directly to the Force Intelligence Bureau, but in this case little increase in throughput was noted.⁵²² These measures were implemented over and above initiatives taking place across the UK in support of the Government Agency Intelligence Network (GAIN) which itself was being used to promote the sharing of intelligence, where possible, across government agencies by police Regional Organised Crime Unit's (ROCUs).⁵²³

Charities were also seen to be a valuable contributor from an intelligence perspective. As a result of their existing work with specific communities and groups, it was perceived that they were not treated with the same level of mistrust. They were able to leverage existing relationships, often built up over years and years of positive work with specific groups, and encourage referral, provide reassurance that the support structures victims so desperately need and provide feedback on possibility areas of vulnerability and risk.

The value of those relationships can be seen within the sex-work community. Charities, particularly those focused on providing support for sex-workers, as opposed to those who are more oriented on 'rescuing', were observed to provide a valuable and, often, confidential support structure for workers who may otherwise not engage. Sex workers are a particularly interesting example in this context as a result of their traditionally fractured relationship with law

⁵²⁰ Interview with a police Detective Sergeant, Region 1, 7th September 2015.

⁵²¹ Figures held for 2015 only take into account the period ending 31st October 2015 so the true percentage increase will be larger than stated here; Region 1 Modern Slavery Partnership Yearly Review for 2015, Personal Communication, 1st January 2016.

⁵²² Interview with a Police Detective Chief Inspector. Region 4, 9th March 2018.

⁵²³ Open Rights Group, "ROCUs and GAIN."

enforcement. As a result, sex workers who are victims of modern slavery are unlikely to come forward for referral, fearing they themselves will instead face prosecution.

“I wonder about sex-work, I know, but I can only talk about that, but I wonder about that and I’ve always thought about best kind of intelligence, because sex workers are kind of, sort of, hidden quite a lot really, except with projects and police, but you know, they obviously don’t want to engage with police very much. Then of course the other group is buyers and I wonder how intelligence comes and could come from buyers. And I know that’s a massive subject, because it’s all about reducing stigma and all those types of things and its hugely problematic. But I’ve always wondered if that’s an area of, if that’s a group of people that would have potentially quite a lot of hefty intelligence.” ⁵²⁴

The stigmatisation of sex-work, and those who pay for sex, also means there’s also gaps in reporting from the side of the client, as well as the workers themselves. Furthermore, as with other forms of exploitation, victims are not always, or frequently aware, that they are even victims to begin with.

“... you obviously get a lot of the people who are victims, but I think that a lot of the victims in the sex work world don’t even realise that they’re victims, so they’re not going to [come forward]... so that is, that’s the thing.” ⁵²⁵

However, the potential of partnerships to begin to try and bridge these gaps, and address these challenges are increasingly evident from the regions studied. The work of the police, alongside charities, like those quoted around sex-work, provide a clear line of communication between the specific groups and the police via an intermediary. These communication lines can be used to report intelligence up the

⁵²⁴ Comments from a Sex-worker support NGO representative, Region 1 Focus Group, 24th January 2017.

⁵²⁵ Comments from a Sex-worker support NGO representative, Region 1 Focus Group, 24th January 2017.

chain to the police as well as down to the workers themselves to increase levels of safety and awareness about particularly issues that are known in areas in which they are operating.

“Yes, definitely, part of the approach is that we’ve got a sex work liaison officer, and her whole job is around sex worker safety. So, there is a very clear pathway between, sort of, the trafficking unit, the liaison officer and us as projects. That means that quite quickly, if I’ve got concerns, I can take it immediately and get it looked at and get it linked between other stuff. But also, if the [police] trafficking unit have concerns then they can link that back...”⁵²⁶

The multi-agency relationships have also helped to foster new and novel approaches to reducing the threat posed to street-based sex workers. In one particular area of region one, a ‘managed approach’ system was piloted, creating a safe space where solicitation was temporarily decriminalised. The managed approach, by its nature, creates a centralised zone where many of the city’s workers could then solicit customers legally and safely, meaning police and support charities can also operate in the area, offering health screen services and safety information.

“The idea was around, to increase the safety for sex workers. They have better relationships with the police now, and they report a lot more. It’s a quite a small area. [...] We’ve got evidence now around reporting and stuff to suggest that it is an area that makes people feel safer.”⁵²⁷

While these measures were observed to break down barriers with specific groups, such as sex-workers, the partnership approach generally was used as a way to build relationships between the police and other stakeholder organisations. Police were observed to be actively making efforts to share localised intelligence profiles

⁵²⁶ Comments from a Sex-worker support NGO representative, Region 1 Focus Group, 24th January 2017.

⁵²⁷ Comments from a Sex-worker support NGO representative, Region 1 Focus Group, 24th January 2017.

with organisations attending local partnership forums. This was in addition to helping raise awareness of local issues and improving the appreciation of modern slavery indicators to further drive intelligence throughput.⁵²⁸ As an additional benefit this was also observed to provide a tangible sense of inclusion and sense of collaboration, rather than the partnerships acting purely as an additional intelligence resource, or police informants, and provided a valuable means of localising the modern slavery issue.⁵²⁹

Despite this, some areas did experience challenges – and the continuation of initial spikes in information and intelligence referrals were not always present. In region five (coastal south) one possible reason for this was identified:

“We find it quite difficult in terms of the partnership intelligence. You kind of have to ask such detailed questions that it makes it so difficult to know when to put it in. If you could do it where you can just tell a story and then the experts will just pick it out. That would be much easier. But, the sort of systems and processes and the way we have to handle our data and manage it doesn't really assist with that. And so it does just get down to that stage where it's too difficult so people may not bother.”⁵³⁰

In region four (rural south), where a similar process had been implemented a police respondent commented that despite a significant amount of input in training frontline workers from partners on intelligence and developing a simple form for its submission; very little had been received back from the majority of organisations.

“There's me, there's a GP that goes there and she spends a lot of her spare time going around and talking to GP services about modern slavery and I've given her some resources and things like that. But actually, what we get back from GPs? ... Next to nothing. Fire service are quite good. They

⁵²⁸ Comments from a Local Authority Safeguarding Lead, Region 1 Focus Group, 24th January 2017.

⁵²⁹ Comments from a Local Authority Safeguarding Lead, Region 1 Focus Group, 24th January 2017.

⁵³⁰ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018.

engage with us, they carry out a fire check up on commercial premises, which they are prepared to do and have a responsibility to do. So if they're at a takeaway and they go in there and there's nine Romanian guys in a room, they feed that back into us and we say right, can you arrange another visit and we'll send another officer with you, and we can start that process. So they're quite good. We get very little out of social care and other people like that unfortunately.⁵³¹

Commitment to partnership work and to the anti-slavery agenda at large from other statutory organisations was also observed elsewhere. At a training event designed to raise awareness of modern slavery among frontline workers in December 2016, a number of representatives from the Metropolitan Fire Service responsible for conducting inspections on small businesses in London acknowledged that they were, prior to attending the event, not even anecdotally aware of modern slavery and how they may encounter it during their day-to-day activities, never mind trained to spot the indicators or made aware of reporting procedures.⁵³² This is despite the fact that small businesses, such as restaurants, takeaways, nail-bars and others are known to use exploited and slave labour, and act as fronts for other forms of crime which could be identified during inspections if indicators were known.

The findings discussed here show how issues associated with gaps in understanding via intelligence, the localised picture and profile of modern slavery identified here can, to some extent, be mitigated through multi-agency anti-slavery partnerships. The use of localised input and information enables richer and more detailed contributions to regional and national intelligence pictures. By making use of the first hand and soft intelligence of partner agencies working on the frontlines (i.e. public sector functions such as housing and healthcare, the private sector and NGOs who work directly with vulnerable groups and victims)

⁵³¹ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁵³² Comments from a Metropolitan Fire Service representative, Modern Slavery Training Event, Personal Communication, November 25th, 2016.

partnerships are able to maintain a localised understanding and develop targeted anti-slavery interventions that address the most pressing of issues.

The reliance on ‘special people’, and commitment from specific partners and individuals remains a vital but demanding aspect of maintaining momentum in this area. However, positives can be attributed to the use of national materials to foster local action and critical thinking, whilst also shaping victim-focussed criminal justice responses that are sensitive to local requirements, and that address the specific challenges and issues that are present across the varied geographic and socio-economic landscapes in across force areas. Moreover, through being more acutely aware of issues at local levels, training and awareness schemes can be more targeted, and the improved intelligence picture can be used to facilitate further engagement with additional agencies and organisations.

In addition to the proliferation of training and education campaigns to mitigate against the clear gaps in knowledge and process which continue to plague this area, another attempted intervention involved a small but significant change to the way in which intelligence is recorded within the police’s intelligence infrastructure in region one (large metropolitan). This change involved reform in the way in which intelligence is ‘flagged’ in the intelligence system and case management systems. New flags that allowed for the specific marking of modern slavery were added to both systems so that potential occurrences could be marked explicitly in the system during data entry – coinciding with the rollout of training and ‘spot the signs’ guidance within the force. Further, additional revisions were made to include the provision to separate between both presumed and potential and offenders and victims, whereas previously, manual signposting was required to differentiate between different persons of interest.⁵³³

Moreover, in acknowledgement that awareness and understanding around the area was, and is, still developing, the central police anti-trafficking unit implemented measures to review all force intelligence and crime submissions each day in order to flag instances with likely connections to slavery that may have

⁵³³ General Report: Operations and Partners, Region 1, Personal Communication, 18th June 2015.

otherwise never have been marked as such. Of course, all intelligence should be appropriately followed up, either in terms of being directly actioned and triggering an investigation or further developed and researched.

“The events are skimmed manually at the start of each shift so as not to assume that all events that may contain elements of trafficking, or now, modern slavery, have been captured as such. For example, kidnappings, sexual offences and others may be marked using the most obvious type of crime they likely constitute however, using the experience / knowledge of the trafficking team as an initial human filter, possible instances and links to trafficking can be established at this early stage and progressed slash investigated.”⁵³⁴

⁵³⁴ Interview with a Police Detective Sergeant, Region 1, 16th March 2015.

Key Findings:

- General understanding around modern slavery has increased significantly. However, localisation of issues remains limited.
- Though police are able to highlight certain operations and have focused on specific issues such as hand car washes and online sex work advertisements, the overall local intelligence picture is still developing.
- There is evidence that that understanding that does exist has been put to use by police and has encouraged local activity to identify victims directly and to build an understanding of common venues of exploitation.
- Police were found to be enthusiastic at the prospect of partnership working as an intelligence collection exercise – with partners identified as a potential source of information on what was happening in communities where police did not necessarily have a foothold.

This chapter has discussed and ultimately summarised how, absences in understanding and awareness culminate in issues surrounding an incomplete and often skewed appreciation of the true nature and scale of contemporary slavery, inhibiting truly targeted local interventions. The interconnected issues associated with absences in understanding, deficiencies in reporting , and intelligence capture all contribute to the large blind spots in understanding of the true nature and scale of modern slavery, reinforcing the findings of Haughey and HMICRS discussed in the earlier literature review (p.75).⁵³⁵ It is this understanding that

⁵³⁵ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking”; Haughey, “The Modern Slavery Act Review: One Year On.”

ultimately informs criminal justice response and proactive victim identification approaches. Despite this, the popular narrative suggests the problem continues to grow, and evidence suggests that in areas where resource has been allocated to uncover and address these issues, it is there to be found, with prosecutions and victim referrals rising starkly since the national prioritisation of modern slavery by the Home Office. With the increased focus on modern slavery comes the requirement to upscale efforts to prevent and respond to it.

Discussion within the chapters has focused on how a lack of awareness and understanding of contemporary slavery at large contributes to the pervasive and, often, systematic failures in the recording of crime, the capture of intelligence and the ultimate referral and safeguarding of victims. The interventions described are hoped to contribute, like many discussed in this chapter, to an increase in the number of victim referrals, the overall throughput of intelligence entries related to moderns slavery and increase in the number of crimes logged and subsequently investigated by the force all aided by an increase in the amount of awareness exhibited by the statutory and non-statutory partners working across the region. In turn, it is hoped that these challenges, and the actions taken in response would have a cascading impact onto the wider (known) picture and understanding.

10 VICTIM REFERRAL & SUPPORT

Central to the UK's modern slavery strategy is the drive for improved victim support. However, criticisms levelled at the provisions of the Modern Slavery Act 2015 have singled out a lack of formal measures to introduce a truly victim-led approach. The specifics of the Modern Slavery Act 2015 were discussed in more detail during the literature review. Despite suggestion that the clauses within the Act did not go far enough in terms of victim protection, the empirical work conducted within this study has revealed, at the very least, an increased enthusiasm from partnerships and, in many cases, an increased focus on providing victim support services that go beyond those introduced within the scope of the statutory requirements of the NRM and Modern Slavery Act 2015.

The desire to improve the level of service and support provided to victims continues to form a prominent element of regional and national discourse around modern slavery. Despite being at the forefront of national consciousness however, a number of systemic issues remain. For instance, migrant communities continue to be at high risk of exploitation by those in their own communities. Engagement and relationship with those specific communities by statutory organisations and charities varies greatly from area to area, often reliant on the individual relationships of frontline workers with community members. In addition, immigration authorities continue, in some areas, to operate with a degree of autonomy, with objectives and agendas separate (and often conflicting) to those of the police, anti-slavery partnerships and other stakeholders engaged with the national modern slavery agenda.

As has been established in earlier sections, this has a number of potentially negative ramifications. For instance, those without legal status to remain in the UK – such as non-EEA victims, may be dealt with as straightforward illegal immigration cases and left with no access to support, and potentially even deported if they are found to be residing in the country illegally. While itself the focus of much criticism, the NRM remains the sole and formal means for determining an individual's status as a victim, and the gateway through which

access to accommodation and support services can be ascertained. It is within this environment, and within these legislative constraints that the organisations consulted as part of the anti-slavery partnerships studied must work.

10.1 IDENTIFICATION AND REFERRAL

As discussed in the earlier literature review (p.49), the terms of the National Referral Mechanism (NRM) dictate that potential victims are entitled to 45 days of ongoing support and accommodation, pending a conclusive decision on their status. This is now followed by an additional period indefinite period of ongoing support – provided based on the results of a needs assessment, or for as long as victims request.⁵³⁶ Previously however, before a landmark case found the UK’s limit on victim support to be unlawful, victims were only afforded entitlement to a further 45 days, an amount which itself only increased from 14 days as a result of revisions made in October 2017. This meant that, until recently, victims only received a total of 90 days support if they were confirmed as such by the Home Office.⁵³⁷ Despite the improved measures, the quality and availability of support – particularly accommodation, offered to victims can vary greatly, especially considering the amount of support which is provided outside of the statutory requirements of the NRM, requirements which, many argue still fall well short of satisfactory.

Despite significant input in training and raising awareness among frontline workers from both the statutory and private sectors in identifying potential victims, in many cases individuals remain reluctant to disclose and consent to referral through the NRM. The reasons for these absences in self-referral are often contextual in relation to the circumstances of the individual, and the conditions

⁵³⁶ Duncan Lewis Solicitors, “Home Office Concedes That Their 45 Day Policy for Providing Support for Victims of Trafficking Is Unlawful.”

⁵³⁷ Sarah Newton, “Modern slavery Victims to Receive Longer Period of Support,” 2017, <https://www.gov.uk/government/news/modern-slavery-victims-to-receive-longer-period-of-support>.

under which they are enslaved and exploited.⁵³⁸ These issues include such things as endemic problems with the UK's visa system which effectively binds foreign domestic workers to their employers, preventing them from leaving exploitative employment.⁵³⁹ While in other circumstances, victims are often unwilling to come forward due to culturally ingrained mistrust of the authorities and statutory organisations. This is particularly true of migrant communities who may be unclear of their legal entitlements or come from countries where law enforcement and public bodies have histories of corruption.

“We recognise that quite often when you come across, especially a foreign national, they're gonna have concerns about the state, they're gonna have concerns about law enforcement [sic].”⁵⁴⁰

Victims also fear what might happen should their exploiters find them trying to escape enslavement.⁵⁴¹ Moreover, in some cases, victims are not aware that they are victims of exploitation at all; again, providing a significant barrier to referral. This was noted especially in interviews relating to labour exploitation cases with eastern European victims, and in cases related to forced sex-work.⁵⁴²

The NRM itself relies on consent to referral. This creates a problem because not only is it the UK's mechanism for supporting victims, it's also the primary mechanism used for recording and measuring the number of potential victims; especially given criticisms of the Police's diligence in using the duty-to-notify-mechanism.⁵⁴³ Practitioners from regions two and five (devolved and coastal south) highlighted separate instances where during business visitations workers

⁵³⁸ Anette Brunovskis and Rebecca Surtees, “Out of Sight? Approaches and Challenges in the Identification of Trafficked Persons,” *The Fafo/NEXUS Institute Project: Improving Services to Trafficked Persons* (Oslo: Allkopi AS, 2012), https://nexushumantrafficking.files.wordpress.com/2015/03/out-of-sight_identification_nexus.pdf.

⁵³⁹ Maroukis, “Keeping Up Appearances: The British Public Policy Response to the Trafficking of Domestic Workers in a Changing Regime of Social Protection.”

⁵⁴⁰ Interview with a police Detective Sergeant, Region 2, 21st February 2018.

⁵⁴¹ Interview with a Police Detective Inspector, Region 4, 9th March 2018.

⁵⁴² Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018; Comments from a Sexworker support NGO representative, Region 1 Focus Group, 24th January 2017.

⁵⁴³ Haughey, “The Modern Slavery Act Review: One Year On.”

were interviewed claiming to be fairly remunerated and not exploited. But the consensus from police interviewees was their gut feeling was that this is not always the case – but in such cases they had no recourse of action.⁵⁴⁴

The same conversations also highlighted a lack of surface-level differentiation, or at least explicit recognition, from practitioners – particularly police, around the difference between exploitative labour and modern slavery. After all, it's perfectly plausible for someone to be working in a labour situation that they are, by most accounts, 'free' to leave, but are being unfairly paid for, or mistreated in some way. Labour exploitation exists on a scale, from one end where work is legally exploitative because employees are paid less than the minimum wage, through to forced labour that meets the criteria for modern slavery, making victim identification extremely challenging.

One particular police respondent recounted how visitation of a hand car-wash led them to question this issue after being told by a potential victim that they were fairly paid.

“I think that's where, what they suspect and what they can prove, and what they believe is going on in terms of the nature of exploitation [...] and what they can evidence either through their screening exercises or through the NRM referrals [is different]. There is a gap there.”⁵⁴⁵

“These guys are coming over; they are making a bit more money than they are getting at home and nobody is stopping them to moving on [sic].”⁵⁴⁶

“If you go out and get a Romanian guy out of a car wash that's been run by an organised crime group of Albanians - which is something we see. That Romanian guy could turn around and say 'hang on a minute, I'm earning, perfectly'... I mean in our standards they are being exploited, of course they are, but from their position they're saying 'well actually I'm earning

⁵⁴⁴ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018; Interview with a Police Detective Sergeant, Region 2, 21st February 2018.

⁵⁴⁵ Interview with a central government representative, Region 2, 19th February 2018.

⁵⁴⁶ Interview with a Police Detective Sergeant, Region 2, 21st February 2018.

more money than I was at home, I'm living here, I've got the chance to send... returning money home, and, we can't evidence any threat to them [sic]." ⁵⁴⁷

Such cases were seen to create a challenge in progressing investigations as police noted they were often unable to build evidence without the support of the presumed victim; and issues which are discussed in more detail in later chapters around threat reduction and investigation. *"They don't see themselves as a victim, and you can't... you really struggle to evidence it without their support."* ⁵⁴⁸ Despite measures aiming to improve frontline practitioners' ability to 'spot the signs' in some regions, such as providing a screening form, there was clear recognition that identifying victims remained extremely difficult.

10.2 THE NRM PILOT

In response to some of the criticisms of the NRM process, the NRM pilot introduced a number of changes to the referral process in 2015, but not the extent of the provisions available to support victims. However, these were also met with some scepticism from members of the partnerships, and it is perhaps telling that following the pilot's conclusion in 2017, there has not yet been a wider rollout of changes. In particular, criticism cited increased levels of responsibility on partners without provision of resource or adequate training, and without any regional consultation.

"We've not been involved in any of the stakeholder things in relation to the NRM pilot changes at all. So, we've got these fantastic networks up here, who are the highest for referrals, but yet we weren't consulted [...] you know, we were running the pilot, we had people doing SSL roles, taking on new roles, doing the multi-disciplinary panels. And we weren't asked at all how it worked. And then we're expected to change systems and all

⁵⁴⁷ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁵⁴⁸ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

change these processes and, once you've have gone in and changed a process throughout massive partnership organisations it is difficult to go in and say no, you're not doing it like this anymore now you're changing, you're reporting it there.”⁵⁴⁹

The pilot process has also received criticism from members of the partnership networks for introducing widespread changes to their internal process and the responsibility attributed to individuals, without a broad appreciation of its impact upon the partners themselves. Similarly, the government's own evaluation of the NRM pilot generally supported the assertions made by participants. Despite improvements to the time taken to make, and success ratio of reasonable grounds decisions, little improvement was seen elsewhere in the process. Moreover, the sustainability of the approach viewed as unworkable by participating practitioners as the SSL and multi-disciplinary panel roles were undertaken in addition to existing responsibilities.⁵⁵⁰

On the whole, while the pilot itself may not have been considered a success, it did highlight the potential strength of the partnerships in region one (large metropolitan), and in particular the leadership shown by the police force's anti-slavery team in that region.

“They have been really instrumental in that and really pushing, and pushing for process that were working with you, in ‘area A’ enabled us to, and given us the correct intelligence and knowledge, so we can as a partnership do our part. And it really has come a long way in the last two years, when this pilot started, the changes that have come and the partnerships and the relationships that have developed have been really successful.”⁵⁵¹

⁵⁴⁹ Comments from a local Community Safety Partnership representative, Region 1 Focus Group, Personal Communication, 24th January 2017.

⁵⁵⁰ Ellis, Cooper, and Roe, “An Evaluation of the National Referral Mechanism Pilot.”

⁵⁵¹ Comments from a local Community Safety Partnership representative, Region 1 Focus Group, 24th January 2017.

Taking this particular district in region one as an exemplar, the role of the force team has been acknowledged as essential in supporting the implementation of the NRM pilot across the region's partners. Later in this chapter, the notion of 'buy-in' will be discussed as an essential factor in multi-agency collaboration. Without it, partnerships seem to struggle, stemming the permeation of information, knowledge development and 'commitment to the cause' through the various actors involved in the interventions employed. Within the context of the study, this means that the mandate of central infrastructure and process can be easily undermined if the objectives are not shared and collectively valued across the various individuals and groups involved. From within the network of partners participating across region one, the perception of success comes in part from this notion of voluntary commitment or 'buy-in', and a shared passion that has led to the formation of what, in effect, has developed into a fully formed community of practice.

10.3 IMMIGRATION ENFORCEMENT

Human trafficking, people smuggling, and illegal immigration have long been entangled, and in many cases confused as synonymous.⁵⁵² While all three are clearly distinct, and an individual's legal status, or lack thereof, is by no means a perquisite for exploitation, there is no doubt that the precarious situations of those living in the UK without legal status, and thus access to state health, welfare and support services, makes them a severely at-risk group when it comes to modern slavery.⁵⁵³ In fact, the status of those seeking asylum in the UK has been framed by Lewis et al. under the heading of 'hyperprecarity', with the UK's immigration policy considered to be a structuring and sustaining factor that

⁵⁵² Andrew Geddes, "Chronicle of a Crisis Foretold: The Politics of Irregular Migration, Human Trafficking and People Smuggling in the UK," *British Journal of Politics and International Relations* 7, no. 3 (2005): 324–39, <https://doi.org/10.1111/j.1467-856X.2005.00192.x>.

⁵⁵³ Dwyer et al., "Forced Labour and UK Immigration Policy: Status Matters."

contributes to the country's forced and exploitative labour issues.⁵⁵⁴ Though the issues discussed in this thesis lean towards a focus more on human behaviour and 'organisational' process, the challenges faced by modern slavery victims are inextricably intertwined with those relating to immigration and labour policy. The UK's current drive against modern slavery is set against a legislative paradox that includes a largely exclusionary immigration policy and an environment of labour market deregulation that exacerbate the precarity of vulnerable groups; particularly refugees and asylum seekers, making them vulnerable to exploitation at the hands of traffickers and slave masters.⁵⁵⁵

This conflicting landscape provides fertile ground for a number of challenges linked to the successful identification, support and recovery of victims. From the primary information elicited in this study, it is impossible to make any estimations as to the extent of the scale and proliferation of the following problems. Instead, the viewpoints presented should be taken anecdotally, as possible challenges that arose across the regions studied. For as long as the NRM fails to offer long-term leave to remain as a standard support provision, there remains a vector through which there is potential for victims to be wrongfully deported from the UK when they do not have legal status.

To exacerbate this problem further, individuals from outside the EU who present to immigration authorities may potentially claim to be victims of trafficking in order to try and claim asylum. This self-identification should result in an initial referral through the NRM by immigration authorities so that a more thorough assessment can be made. However, there was anecdotal information received from regions one (large metropolitan) and four (rural south) that illustrated how these individuals had, in some instances, been dealt with as any other person seeking asylum, raising concerns that adequate measures were not in place to identify, or enable them to disclose as, as potential victims. Moreover, as

⁵⁵⁴ Lewis et al., *Precarious Lives: Forced Labour, Exploitation and Asylum*; Lewis and Waite, "Asylum, Immigration Restrictions and Exploitation: Hyper-Precarity as a Lens for Understanding and Tackling Forced Labour."

⁵⁵⁵ Lewis et al., *Precarious Lives: Forced Labour, Exploitation and Asylum*.

discussed earlier in the earlier literature review chapter, ‘reviewing recent progress’, cases involving potential victims from outside the EEA are statistically less likely to get a successful decision on their referral from the Home Office. Thus, if no other legal basis for their residence in the UK was identified, they were eventually processed as illegal immigrants. This was also a view shared by police in region two (devolved).⁵⁵⁶

“Every time that we bring somebody in, in this force area, we might have some concerns that they've been trafficked but if they're illegally here and they go in the direction of immigration enforcement I've got to have some confidence that throughout that process they are given a genuine opportunity to disclose [as a victim] throughout. So, am I absolutely confident that they do that? ... Not yet, no I'm not and that worries me a little bit.”⁵⁵⁷

Similar problems were noted in region one where concerns were raised over the actions, and potential implications associated with immigration sweeps and its impact upon charities working within specific communities, in the process destroying trust-based relationships that had been established and potentially not offering victims adequate chance to disclose as victims.

“It seems that the immigration and the [human] trafficking [unit] don't have any control or link between each other. So, it seemed to me that [...] the immigration [authorities] could just do what they wanted, and nobody had any say in that, and how that might affect potential victims of trafficking. Which I think it did do. We had some people that we were concerned about, and we were sort of chipping away, chipping away and chipping away, and then all of a sudden it's like off to location x, gone get back in the country and we can't talk to anyone, can't talk to the local police about anything, I can't have any conversations, because I'm worried,

⁵⁵⁶ Interview with a Police Detective Sergeant, Region 2, 21st February 2018.

⁵⁵⁷ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

and they don't understand the difference between the local police and the immigration police and the trafficking police or any other kind of police."⁵⁵⁸

As a result, concern was expressed about how organisations, such as the one quoted, who are known to have a relationship with the police may be mistaken as acting as an intelligence source for immigration enforcement, despite the fact that these organisations often operate strict data sharing agreements and do not even disclose information to police unless there is a very direct and immediate safeguarding threat to an individual.⁵⁵⁹

These challenges, and this level of autonomous intervention, result in a lack of cohesion between immigration services and police. Not only does such activity cause immediate problems in allowing victims to drop through the safeguarding net, ensuring their continued vulnerability to further exploitation and future trafficking, but also prevents the true scale and nature of the problem from being accurately captured, often meaning that the statistics are skewed in favour of victims originating from the EU. Deported victims are highly vulnerable to re-trafficking, with deportation to their home countries often resulting in them being returned back into exploitation, either here in the UK, or elsewhere in Europe. The comments made further emphasise the need for training, and potentially a fundamental change in approach from immigration and compliance enforcement. The current focus on enforcement, itself set against a backdrop of exclusionary national immigration enforcement, means that encounters with, and opportunities to refer and safeguard, potential victims of modern slavery are likely being missed.

Of course, the potential ramifications of deportation when steps are not being taken to identify, refer and ultimate support potential victims is huge. The unfortunate reality is that these individuals who are exploited prior to deportation are plunged back into precarious situations in the home countries and made

⁵⁵⁸ Comments from a Sex-worker support NGO representative, Region 1 Focus Group, 24th January 2017.

⁵⁵⁹ Comments from a Sex-worker support NGO representative, Region 1 Focus Group, 24th January 2017.

vulnerable to re-trafficking. In some cases, anecdotal information suggests that these individuals either resurface elsewhere in the UK, vanish completely, or are later identified as being exploited elsewhere in the UK, or abroad. These ramifications are exemplified by the accounts of a local charity representative who discusses her experiences in working with a Romanian victim who was forced into prostitution:

“I mean from a very real outcome that was one lady went off and sent back to Romania, arrived back in the UK within a few days after going to Ireland and then back in that way. So, it just didn’t work. And then the other ones just disappeared, then these weren’t people that were sent back to Romania or a detention centre, they literally just disappeared because they were given 30 days and then off they go somewhere else. God knows where, into to a place where we’ve got no idea what’s happening to them, and then you’ve got another bunch of people. So, it didn’t do anything of any substance apart from make people more unsafe, more hidden, more fearful and undoes all the kind of chipping that we’ve been doing.”⁵⁶⁰

In other instances where raids have taken place, even when the police are present, the presence and operations of immigration enforcement seem complicit to ensuring victims are not successfully identified and reinforces the ingrained cultural assumptions that law enforcement is hostile to victims.

“I think, the only thing that they did in the one that I’ve just witnessed. Is that they had the trafficking police there in case anything was identified, but nothing was ever going to get identified in a situation like that, it was monstrous... I think it’s a big problem and I think it’s having a massive effect on trafficking and the work that’s happening there.”⁵⁶¹

⁵⁶⁰ Comments from a Sex-worker support NGO representative, Region 1 Focus Group, 24th January 2017.

⁵⁶¹ Comments from a Sex-worker support NGO representative, Region 1 Focus Group, 24th January 2017

“I think its work that’s effectively supporting those that continue to traffic people into this country. Its reinforcing messages that they are being told that if you tell the police then well they will just send you back when you do.” ⁵⁶²

In region two (devolved), there was a genuine belief from police that if gaps in the process involving immigration Enforcement were rectified, it would result in the numbers of non-EU/EEA victims identified and referred being much higher. ⁵⁶³ It was also identified as a known issue that was being worked on by the police in collaboration with Immigration Enforcement in that area. Moreover, in a recent case covered in the media, a Ghanaian victim was successfully and rightfully accepted as a victim of trafficking, but subsequently deported by the Home Office anyway. ⁵⁶⁴ A court eventually found the decision not to grant leave to remain to be in breach of the UK’s commitment to the 2005 Council of Europe Convention on Human Trafficking, illustrating a level of discriminative bias in the actions of immigration enforcement towards some modern slavery victims - specifically, those without legal status to reside in the UK. ⁵⁶⁵

These factors present a number of issues. Not least of them is that a potentially vulnerable individual is plunged back into precarity in their home countries, where they become prime targets for re-trafficking, further exploitation or worse. ⁵⁶⁶ Further, from a policing viewpoint, it was noted in an interview with a police officer from region one (large metropolitan) that without an initial referral through the NRM, an identified individual is never actually recorded as a potential victim. The intelligence picture therefore remains incomplete and any trends involving trafficked or enslaved individuals from outside the EU potentially goes

⁵⁶² Comments from a national anti-slavery NGO representative, Region 1 Focus Group, 24th January 2017.

⁵⁶³ Interview with a Police Detective Chief Inspector, Region 2, 8th February 2018.

⁵⁶⁴ Anna Sereni, “A Legal Win That’s Left Victims in Limbo,” Anti-slavery International, 2018, <https://www.antislavery.org/a-legal-win-left-victims-in-limbo/>.

⁵⁶⁵ Council of Europe, “Council of Europe Convention on Action against Trafficking in Human Beings,” *Council of Europe Treaty Series* 197 (2005), <https://rm.coe.int/168008371d>.

⁵⁶⁶ Lewis et al., *Precarious Lives: Forced Labour, Exploitation and Asylum*.

unreported.⁵⁶⁷ Moreover, in many cases no crime is ever recorded in instances where no victim has been referred, despite Home Office counting rules requiring crime to be regarded as independent to victim referral.⁵⁶⁸ However, NRM figures from 2018 did rank victims from Vietnam (737), China (451), the Sudan (362), Eritrea (302) and Nigeria (243) amongst some of the highest numbers of referrals for that year, sitting only behind the UK and Albania.⁵⁶⁹ Though these could be skewed given the level national attention towards Vietnamese owned nail-bars as a possible venue of exploitation.⁵⁷⁰

It should be noted, however, that steps have been taken to provide training for immigration enforcement on modern slavery across the regions studied.⁵⁷¹ This was one of the many positives taken from the integration of immigration enforcement into partnership arrangements across all four regions, despite potentially competing agendas. While police might understandably be less suspicious of immigration enforcement than victim focused NGOs, concerns were still present that their primary function remains immigration enforcement – not identifying potential victims of modern slavery. Thus, concerns still remain that victims are not being identified by enforcement officers, and therefore there is a still a significant risk of wrongful deportation in cases where victims do not have adequate opportunities to disclose.

⁵⁶⁷ Interview with a Police Detective Sergeant, Region 1, May 5th 2016.

⁵⁶⁸ UK Home Office, “Home Office Counting Rules for Recorded Crime,” 2018, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721595/count-general-jul-2018.pdf; Gary Craig, “Modern slavery in the United Kingdom: An Incoherent Response,” in *Social Policy Review 30: Analysis and Debate in Social Policy*, ed. Catherine Needham, Elke Heins, and James Rees (Bristol: Policy Press, 2018), 27–46, <https://policypress.co.uk/resources/kara-creative/social-policy-review-30#book-detail-tabs-stison-block-content-1-1-tab2>.

⁵⁶⁹ National Crime Agency, “National Referral Mechanism Statistics - End of Year Summary 2018”.

⁵⁷⁰ See for example Gentleman, “Slavery Report Sounds Alarm over Vietnamese Nail Bar Workers.”

⁵⁷¹ Comments from a UK Immigration Enforcement representative, Region 1 Focus Group, 24th January 2017; Interview with a Police Detective Inspector, Region 3, 7th March 2018; Interview with a Police Detective Chief Inspector, Region 2, 8th February 2018; Interview with a Police Detective Inspector, Region 4, 9th March 2018.

There was however explicit reference made in regions two (devolved), three (rural north) and four (rural south) to suggest that operations with immigration enforcement were now increasingly collaborative.⁵⁷² Police, Her Majesty's Revenue and Customs (HMRC), the fire service and other statutory organisations were stated as all being regularly present when visits and inspections were made to business premises believed to be harbouring victims, increasing opportunities for discovery and disclosure.

Police in regions one and four also recounted that the aforementioned challenges associated with immigration enforcement were potentially damaging the police's reputation among migrant communities, making it difficult to raise awareness of risks and ultimately preventing victim identification.⁵⁷³

"With the agencies that we engage with in particularly with District X, and the drop-in to District X day shelter and agencies like that who see destitute people, they've seen a quite a robust increase in incidents of immigration and they seem to be concerned about the people who access their services, about immigration and the impact its having on in terms of victims coming forward, its instilling that fear." ⁵⁷⁴

"They [victims] don't see the police or immigration enforcement as anything other than 'an authority', they don't differentiate [...] So that's part of the trafficking... the traffickers control and that is to say, 'actually law enforcement are going to go and arrest you and put you in prison so I wouldn't tell them or talk to them at all [...] all they [victims] see is a uniform, and unfortunately sometimes behind that uniform is somebody that does genuinely take them away.'" ⁵⁷⁵

⁵⁷² Interview with a police Detective Chief Inspector, Region 2, 8th February 2018; Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018; Interview with a Police Detective Inspector, Region 3, 7th March 2018.

⁵⁷³ Comments from a Sex-worker support NGO representative, Region 1 Focus Group, 24th January 2017; Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁵⁷⁴ Comments from an NGO representative, Region 1 Focus Group, 24th January 2017.

⁵⁷⁵ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

These perceptions of immigration enforcement create problems for police as they try to build a profile as a 'supportive' victim-focused agency that is there, first and foremost, to assist and protect victims.⁵⁷⁶ These issues serve to further illustrate the importance of collaborative multi-agency work. Tacit factors, including the perceptions held by those that are considered vulnerable; such as migrant communities, are vital in building trust between statutory organisations and those they serve. If individuals are not making a distinction between different statutory bodies, it is the responsibility of those bodies to ensure a coordinated approach is taken to build trust with those communities and individuals, and to implement a truly victim-focused strategy.

Despite some frictions, joint operations between police and immigration were not uncommon. In region four, police described the use of joint visits with immigration enforcement and other statutory organisations:

"So what we're trying to do is when we visit car washes we take the Gangmasters Licensing Authority with us, we take immigration enforcement, which I have some trouble with... I'll come back to that, and we also take HMRC to start challenging the owners of these places to pay people properly and if they're employing somebody who is illegally there, starting putting those 20 grand fines on the employers. And what we've actually found is when we turn up to these places now, as opposed to 18 months ago, they actually have registration details of the people that work there, they actually have some books you can look at, because they're recognising it's poor business for them for us to keep coming in and closing them down, and arresting their staff."⁵⁷⁷

Similar tactics were employed in region five (coastal south), where it was commented that it was done so under the condition that the enforcement of

⁵⁷⁶ Comments from a Sex-worker support NGO representative, Region 1 Focus Group, 24th January 2017.

⁵⁷⁷ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

immigration law would only be used as a last resort with any individuals where there was suspicion, they could in fact be modern slavery victims.

“So yeah they are, they're invited to it and we have had interaction with them on certain jobs so the view would be we will deal with modern slavery first if they... if victims will not come forward and support anything around modern slavery then the final sort of straw and the last opportunity to safeguard is to put them into the immigration system, to remove them from that risk. But no, we would always consider modern slavery first rather than just detaining them and taking them straight to custody under immigration.”⁵⁷⁸

An interviewee from region two (devolved) commented that this also remained true in some cases involving EU nationals who had just as much legal right to stay in the UK as anyone else, highlighting how exploiters may try to convince victims they be suspicious of authorities.⁵⁷⁹ This view was also reinforced by police in region three (rural north).

“You have to be clear that it's about vulnerability it's not just about modern slavery... it's about vulnerability as a broader piece and that after thinking about all of that we'll decide which pot it sits in rather than being so concerned about well you might get it wrong and say its modern slavery when it's child sexual exploitation. And so, they're unclear what it sits in.”⁵⁸⁰

⁵⁷⁸ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018.

⁵⁷⁹ Interview with a Police Detective Sergeant, Region 2, 21st February 2018.

⁵⁸⁰ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018.

10.4 COMMUNITY OUTREACH AND ENGAGEMENT

Possible issues in dealing with specific groups and communities, such as the previously discussed examples related to sex-workers and migrants mean that community outreach and engagement are potentially extremely powerful safeguarding tools. Organisations connected anti-slavery partnerships, particularly NGOs, often have workers on the frontlines who are exposed to communities, each of which potentially contain an element which is potentially at-risk of some form of modern slavery. In region four (rural south), the potential role and utility of faith-based groups and the church itself was seen as valuable in this respect:

“[We know there is a problem with] lots of eastern Europeans as a matter of fact, and they will likely go along to church as a community, and we would never even know as the police that that exists as a community. Whereas the church see it. So, I think, if we were to up-skill the clergy as to what modern slavery looks like in practice. What kind of nationalities that might be impacting upon others? What kind of themes link certain nationalities with certain types of offending, whatever it might be, just update them about the picture, then... we can then provide them with a really simple way of giving us some information.”⁵⁸¹

In fact, a number of positives were cited that built on the work of charities in region two (devolved), particularly those working in specialist areas, such as sex worker support. These included further developing existing trust relationships within the community to raise awareness of modern slavery, promoting reporting, and encouraging potential victims to come forward.⁵⁸²

“That local charity can make contact with them and hopefully increase awareness and education for that person. And it will give them somebody that's not linked to the state or to the security services that they will feel

⁵⁸¹ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁵⁸² Comments from a Sex-worker support NGO representative, Region 1 Focus Group, 24th January 2017.

more open and trustful of to take some information and advice about what their rights and entitlements are.”⁵⁸³

“[We’re able] to break down barriers that they feel that there are people that they can go to and people that they can trust, that they can have, can make an effective difference to their livelihoods. Because, as I said to you at the start of the conversation people genuinely really really care. People get that if somebody is a victim of trafficking and you have the potential where you can see them and potentially help them, this might be their only chance that they have in months or years to break free from the misery that they're living in.”⁵⁸⁴

This sort of work, also seen through sex-work charities in region one (large metropolitan), was seen to be a huge positive. While the consensus seemed to indicate that the information passed on wasn’t necessarily something that individuals hadn’t heard already, it helped reinforce and build trust. In region specific sex-work liaison officers were even employed to give voice and support to sex-workers and potential challenges around modern slavery, and other vulnerability issues.⁵⁸⁵

Work being done by sex-worker support organisations in region one was seen as a real area of success. Work also was also being done in this area in response to risks related to public health as a result of pressure for (forced) sex-workers to work without condoms was also identified, alongside associated pressures for public funding to provide extra money to provide services making them available for free. At the moment, much of this responsibility falls on third sector organisations who themselves are often under resourced and underfunded.⁵⁸⁶ This aside also demonstrates that although a certain amount can be achieved

⁵⁸³ Interview with a Police Detective Sergeant, Region 2, 21st February 2018.

⁵⁸⁴ Interview with a Police Detective Sergeant, Region 2, 21st February 2018.

⁵⁸⁵ Interview with a central government representative, Region 2, 19th February 2018.

⁵⁸⁶ Human Trafficking for the Purposes of Sexual Exploitation Problem Profile, Region 1, Personal Communication, 12th November 2015.

through voluntary participation and buy-in, certain interventions do require the provision of additional financial resource in order to be truly effective.

More generally, work was also being done with those suspicious of referral through the NRM to provide independent follow-up following contact with the police. This often involved those from communities or cultural groups, such as sexworkers or migrant communities, where levels of direct engagement with authority figures, such as the police, were low. With their consent, NGOs working in the area were able to offer follow-up consultations to advise on what services might be available, not necessarily around modern slavery specifically but more generally around employment rights, welfare and other entitlements.⁵⁸⁷

10.5 ACCOMMODATION AND SUPPORT

Another aspect of the positive work being done across the partnerships studied relates to the gaps within the support provisions offered through the NRM; and the work of organisations within the partnerships, particularly NGOs and local authorities, to fill them. Currently, many victims, in areas where there are active NGOs with capacity, actually remain in accommodation much longer than the 45+45 days they are legally entitled to under the NRM. This was certainly highlighted as the case in regions one and two.⁵⁸⁸ This is due to the work of charities who, in Haughey's words, are "picking up the slack" to ensure victims are provided with additional support and accommodation outside of the NRM.⁵⁸⁹

Unfortunately, although a positive, this also serves to further highlight deficiencies in statutory support to re-integrate and support victims. This was noted specifically in region one, where provision was being made by multiple charities to

⁵⁸⁷ Interview with a central government representative, Region 2, 19th February 2018.

⁵⁸⁸ Interview with a central government representative, Region 2, 19th February 2018; Interview with a Police Detective Sergeant, Region 1, 16th March, 2015.

⁵⁸⁹ Caroline Haughey, "The Modern slavery Act Review: One Year On," 2016, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/542047/2016_07_31_Haughey_Review_of_Modern_Slavery_Act_-_final_1.0.pdf; Interview with a central government representative, Region 2, 19th February 2018.

ensure the availability of additional accommodation post NRM, and in some cases prior to victims submitting an initial referral.⁵⁹⁰ In another region, the Fire Service had volunteered the use of one of its buildings as a reception centre to assist with pre NRM support.⁵⁹¹ In regions one (large metropolitan) and four (rural south) work was also being done to fundraise resource for a victim safe-house.

“We've got a bespoke one [a victim reception facility] there set up and primed, set up in the county to do that. That came as a result of the anti-slavery partnership work which is very positive. But that is the type of thing that we do, we find certain issues and then we try and progress them as individual points rather than a broad plan.”⁵⁹²

However, these additional provisions were mostly dependent on the availability of NGOs, and the capacity of those NGOs. In region three and four, there were few NGOs operating in this space, and thus the only provision for support and accommodation was through the Salvation Army; the NGO which holds the government contract for victim accommodation. These regions were more rural than others included in the study.

“One of my problems is, who do I go to? ...because I can't go to charity X [they do not operate in the region]. So... So, who do I turn to? I don't know. Region X have got charity Y, you got the charity Z in region Y [...] In region Z you've got a number of charities you can refer to. We don't have that. [...] So, I struggle personally, if I come across a victim or a potential victim, where do I refer that person to. You know it's... it's easier if they go into the NRM, because obviously then I can look after the five-day period through the council support and then when the decision comes in the Salvation Army steps in. But if I've got a victim or a potential victim that

⁵⁹⁰ Haughey, 26.; Minutes of a local Modern-Slavery Partnership meeting, Region 1, Personal Communication, 1st February 2016; Region 1 Modern Slavery Partnership Yearly Review 2015, Personal Communication, 16th February 2016.

⁵⁹¹ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁵⁹² Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

doesn't want to engage what do I give them or where do I refer them to, and I haven't got the answer to that."⁵⁹³

This also connects back to other issues associated with the NRM and the UK's exclusionary immigration policy. The positive work of the partnerships is helping to simultaneously highlight and mitigate against gaps in the support and victim identification infrastructure; namely the lack of victim assistance and ongoing support. However, it is clear that wider reform is still needed to reduce the current reliance on the exceptional work and goodwill of non-statutory organisations and NGOs.

In one of the local areas consulted within region one, a charity had secured funding to open a safe-house to accommodate up to six victims outside of the then 45+14 day statutory requirement, a first for the region.⁵⁹⁴ Further to this, the region has also acknowledged logistical challenges within the statutory requirement associated with the transportation of victims, placing additional need for temporary accommodation in the region.

"One problem discussed was the temporary accommodation of victims when referrals are made to the National Referral Mechanism. The Salvation Army currently have the contract but there may be a delay of 24 hours in transportation. The victims will therefore need to be housed for a short period of time pending collection. There was also the issue of accommodating victims who refuse to be referred to the National Referral Mechanism."⁵⁹⁵

⁵⁹³ Interview with a Police Detective Inspector, 7th March 2018.

⁵⁹⁴ Meeting Minutes of the 'Area 2' Modern Slavery Forum, Region 1, Personal Communication, 1st February 2016.

⁵⁹⁵ Human Trafficking Task and Finish Group, Region 1, Personal Communication, 23rd April 2015.

10.6 SUMMARY

Key Findings:

- While the Modern Slavery Act itself has been criticised for failing to introduce truly victim-focused provisions to the UK's legislation, a primary focus of partnership work around the country has been to improve detection rates of victims and the support they receive – in many cases beyond the minimum requirements of the NRM.
- Across the partnerships studied, plans and activities were in place or being undertaken to provide extended support; commonly in the form of victim reception centres and safe-houses.
- Macro and systemic factors such as the UK's immigration policy, the subsequent activity of immigration enforcement, and overseas domestic worker visas also continue to pose challenges and inhibit the consistency of service individuals receive, particularly in regards to initial identification and recognition of victim status.
- Despite this, there are clear benefits to be had from including and cooperating with immigration enforcement in anti-slavery work as a key first-responder organisation that interacts with potential victims.
- The NRM pilot scheme which ran from 2015-2017 in two areas of the country was received with mixed feelings and provided, statistically, little in the way of change or improvement over the current NRM process.
- NGOs and charities continue to be seen to provide a vital link with potentially vulnerable, and traditionally marginalised communities. In particular they conduct activities aimed at raising awareness of issues

within them, and in flagging possible issues to the police - particularly with those which have historically fractious relationships with law enforcement.

While much work has taken place across the five regions studied, and nationally in regard to raising awareness and training frontline workers to recognise, and act upon, the indicators of slavery, a number of factors were discovered to inhibit the disclosure and eventual referral to the NRM. Macro and systemic issues with the UK's exclusionary immigration policy, and the subsequent role and actions of immigration enforcement continue to create ripples of distrust within potentially vulnerable communities; such as migrants, while fractious issues between law enforcement and other groups such as sex-workers cause similar concerns from charities working in these areas. However, the role of those charities as a vital link between law enforcement and the individuals potentially at risk has been highlighted. Promising practices including raising awareness, sharing information and flagging potential issues, where appropriate, has also taken place.

Building on these challenges, the victim support provisions contained within the Modern Slavery Act itself have been seen to extenuate the risks to even those who are correctly identified, referred and conclusively recognised as victims by failing to provide access to sufficient support, and adequate time to effectively enable victims an opportunity to integrate back into normal society. The results of a pilot NRM scheme ran between 2015 and 2017 in two regions of the UK intended to speed up the time taken to make reasonable and conclusive grounds decisions on victims – however these were seen to offer little in the way of change or improvement over the current NRM process; and of course do not address the flaws of the NRM generally.

Despite this, positive work being conducted by the partnerships was seen across the regions studied. In these areas, plans and activities were in place or being undertaken to provide extended support; commonly in the form of victim

reception centres and safehouses, beyond the minimum provisions of the NRM. Overall, while the Modern Slavery Act itself has been criticised for failing to introduce truly victim-focused provisions to the UK's legislation, a primary focus of partnership work around the country has been related to improving victim detection rates and the support they receive – in many cases beyond the minimum requirements of the NRM. The ability to truly assess the success and impact of these efforts is limited to gaps in the amount of monitoring and evaluation being done, however anecdotally – some correlation was observed between work being done, and increases in the numbers of NRM referrals, intelligence submissions and numbers of active police investigations across the areas studied.

11 THREAT REDUCTION, INVESTIGATION AND PROSECUTION

The final theme, and thus this final discussion chapter, focuses on the desire and measures taken to improve the Policing response, in terms of criminal justice outcomes, to modern slavery. This response looks primarily at two challenges. Firstly, the need to reduce the threat posed to communities across the regions being studied, and second, to increase prosecution rates for those who seek to benefit from the trafficking and exploitation of individuals within those communities. The context for this overarching theme, which builds upon aforementioned challenges associated with the capture and recording of crime, knowledge and awareness, and gaps in the intelligence picture, is the belief that following a review a year after the introduction of the Modern Slavery Act 2015 overall police response was found to be “*patchy and on occasions unsatisfactory or potentially negligent.*”⁵⁹⁶ Despite acknowledging substantial progress in the area, the review cited significant and continued concerns about the quality of investigations.

While *this* study did not undertake to review the rigour and conduct observed in police investigations specifically, it did pick up on a number of related aspects that could be used to show progress and highlight endemic challenges. For instance, across all the regions studied force policies and guidelines had been updated to emphasise the need for additional diligence in the investigation of modern slavery, and in some cases highlighted specific issues identified within the Stolen Freedom report; such as the need to ensure all crimes are properly recorded and the duty-to-notify provision used to flag the presence of potential victims.⁵⁹⁷ There was also evidence that the role of victim protection was also a primary concern, ensuring that vulnerable individuals are not placed back into precarious socio-economic

⁵⁹⁶ HMICFRS (2017); Letter to Police Chief Constables from the Independent Anti-Slavery Commissioner, Region 1, Personal Communication, 22nd January 2015.

⁵⁹⁷ Interview with a Police Detective Sergeant, Region 2, 21st February 2018; Interview with a Police Detective Inspector, Region 3, 7th March 2018; Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018; Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018.

situations that make them likely to be re-trafficked or subjected to further exploitation – but this is covered in earlier chapters.

One especially prominent point that emerged from the study came from region one, as an early adopter of partnership work. The region had and in place dedicated police anti-slavery resource, and was identified as an area where promising practice was evident and, crucially, dedicated resource and partnership working was being, comparatively, well utilised.

“I have direct involvement across ‘region one’, and I can see the measures being taken are much more far reaching than any other force in the area. In terms of the size and geography of the region. So, certainly in terms of the referrals and recording of crimes into the NRM, from visiting the other forces, the measures being employed here are filtering out into the other forces across the region.” ⁵⁹⁸

“What we’ve been told so far is that ‘region one’ is held up as one of the forces that is actually doing quite a lot, and it is developing a picture...” ⁵⁹⁹

The positivity around the strategies employed in region one came in stark contrast to remarks made about other areas of the UK, both in the recent past and present, where, in extreme cases, there was still acknowledged to be issues in overcoming a reluctance to admit that a modern slavery problem existed at all.

“Some forces that we’re looking at are already saying we don’t have a modern-day slavery problem; it just doesn’t exist. To that we would say that you probably just haven’t turned over the stone.” ⁶⁰⁰

⁵⁹⁸ Comments from a central government representative, Region 1 Focus Group, 24th January 2017.

⁵⁹⁹ Comments from a central government representative, Region 1 Focus Group, 24th January 2017.

⁶⁰⁰ Comments from a central government representative, Region 1 Focus Group, 24th January 2017.

“I used to give the standard excuse of ‘we don’t have a modern-day slavery problem’, so I have been caught victim of that.”⁶⁰¹

Generally, however, strides we’re being taken across the board to increase the quality and consistency of policing investigations. The information received from across the regions was fairly consistent with the national narrative in that where top-down investment had been made into resourcing and prioritising anti-slavery work by the police, it was clear that progress was being made. Whereas in regions where the police were slower to prioritise - typically those with less general resource and located in rural parts of the country - individuals handling the modern slavery portfolio often had to manage it amongst competing priorities and difficulties in overcoming cultural assumptions that there was not necessarily a modern slavery problem there for them to police. Set against this backdrop, a number of key issues still remain, and these are explored in the following sub-sections.

11.1 BRAIN DRAIN

One of the anecdotal, and often cited, issues commonly attributed to policing across the board are failings with, or an absence of, organisational memory.⁶⁰² Individual officers, ranging from frontline detectives right through to senior strategic leads are often reliant on tacit, experiential knowledge and experience developed through years of exposure to the job. With such embedded knowledge, retention, or organisational memory, increasingly becomes an issue. Once an individual changes role, leaves the organisation or retires, it’s possible to be left with a situation where several decades of knowledge and expertise leave the organisation, with little paper trail or knowledge base upon which the next wave of officers and staff can build.

⁶⁰¹ Comments from a central government representative, Region 1 Focus Group, 24th January 2017.

⁶⁰² Stephen Harvey Ritchie, “An Investigation of the Prevalence and Impact of Organisational Learning in UK Police Forces” (Robert Gordon University, 2010), <http://openair.rgu.ac.uk>.

Of course, it must also be recognised that modern slavery continues to be an area where knowledge is still developing. While ‘brain drain’ emerged as a prominent issue due to the potential for what little knowledge did exist to effectively ‘walk out’ of an organisation, the phenomenon may be even more evident in relation to more established crime types.

This also impacts upon partnerships, themselves identified as reliant on the ‘cult of personality’ and the work of local policy entrepreneurs to drive work forward.⁶⁰³ This creates an obvious problem as modern slavery remains an area where it’s acknowledged that awareness and knowledge is limited or still in the process of developing. While a clear issue with police, it was also a something identified during wider engagement with anti-slavery partnerships, all of whom were reliant on commitment, knowledge and often the drive of a few individuals in order to build and continue momentum.⁶⁰⁴

“I think that we as NGOs and the other local authorities and the trafficking network, I think the reason why its progressed as well as it has is because there are a group of people that are actually passionate about modern slavery and the victims of modern slavery and safeguarding victims. And I think If it hadn’t been for that passion driving it through then it wouldn’t have gotten as far as it has got. And I think that’s why it all works so well together.”⁶⁰⁵

Referring back to police specifically, a number of nationally advocated measures and methods have been put in place to try and mitigate against this ‘brain drain’. Significant value was seen in the content of intelligence products which, while primarily based on data, crime records, intelligence entries and previous victim referral information, often did contain rich contextual narrative around certain figures, statistics and profiles which were not always possible to ascertain from

⁶⁰³ Gardner, “An Idea Whose Time Has Come? Modern Slavery, Multiple Streams Approach and Multi-Layer Policy Implementation.”

⁶⁰⁴ Interview with a Police Detective Sergeant, Region 1, 18th June 2015.

⁶⁰⁵ Comments from a Child Safeguarding Board representative, Region 1 Focus Group, 24th January 2017.

the manipulation of raw figures alone.⁶⁰⁶ Declassified versions of these narratives were then used, particularly in region one, to localise issues within district meetings; building awareness and understanding of contextual issues among partner organisations.⁶⁰⁷

UK policing has also established additional mechanisms that reflect many of the attributes normally associated with knowledge management systems and virtual communities of practice.⁶⁰⁸ The Police Online Knowledge Area (POLKA), is the College of Policing's national community of police practitioners.⁶⁰⁹ The platform is designed provide a means for individuals to connect with like-minded peers to exchange ideas in areas of common interest, such as around specific areas of criminality. Use of POLKA is currently on a voluntary basis, although participation may be, and is encouraged in some areas it is very much reliant on individuals to buy-in and seek out information and support for themselves.⁶¹⁰

However, building capacity and capability was not limited to upskilling, raising awareness and training levels, nor strictly the allocation of discrete human and capital resource. Revisiting the central topic of this thesis, and, one of the central themes established as a result of the primary data analysis, the role of partnerships was considered vital here to ensure that relationships are utilised effectively on a daily basis, and that relationships with partners from all sectors and areas are not being negatively impacted upon.⁶¹¹

⁶⁰⁶ Human Trafficking for the Purposes of Sexual Exploitation Problem Profile, Region 1, Personal Communication, 12th November 2015; Reasons for Forced Labour Intelligence Product, Region 1, Personal Communication, 24th July 2015.

⁶⁰⁷ 'Area X' Human Trafficking and Modern Day Slavery Network Meeting Minutes, Region 1, Personal Communication, 14th September, 2015.

⁶⁰⁸ Etienne Wenger, "Communities of Practice - Learning as a Social System," *Systems Thinker* 9, no. 5 (1998): 1–10, <https://doi.org/10.2277/0521663636>; Ben Daniel, Richard A. Schwier, and Gordon McCalla, "Social Capital in Virtual Learning Communities and Distributed Communities of Practice," *Canadian Journal of Learning and Technology* 29, no. 3 (2003): 113–39.

⁶⁰⁹ College of Policing, "Polka (the Police Online Knowledge Area)," 2017, <https://www.college.police.uk/What-we-do/Research/polka/Pages/POLKA.aspx>.

⁶¹⁰ Interview with a Police Detective Sergeant, Region 1, 18th June 2015.

⁶¹¹ Human Trafficking for the Purposes of Sexual Exploitation Problem Profile, Region 1, Personal Communication, 12th November 2015.

11.2 MANAGING INVESTIGATIONS AND INVESTIGATIVE PRACTICE

There was an acknowledgement across the regions studied that police forces were still very much at the inception stage of really building understanding modern slavery and the specific challenges it poses for policing practice. This was reflected by a law enforcement officer in region two (devolved) specifically.

“With human trafficking and modern slavery investigations we're still at that formative learning stage. So that has good benefits and bad. Bad because sometimes bad practice creeps in, or we're not as effective as we can be. But the good part is, everybody who is involved in it has a real... a lot of people who are involved in it have a real moral drive to combat this hideous crime.”⁶¹²

It was also reinforced that the difficulties in addressing modern slavery had, in some ways, pushed practitioners around the UK, and in some cases across Europe, together to share information and experiences. However, the exact approach to managing investigations was varied from region to region, and not only dictated by how much dedicated resource was in place. For instance, regions one and two had sizable dedicated teams working solely around modern slavery throughout my engagement with them; giving those areas among the largest teams in the country. However, as a result of having dedicated resource managing all modern slavery investigations within their central team, region two acknowledged that the approach created potential workload management issues, as they were expected to cope with increasing amounts of intelligence, training requirements, and other responsibilities in addition to actual investigative activity; which itself was also on the rise.

“So, you've got to juggle many hats. So, that's... on the flip side but because we're constantly doing the investigations, then hopefully we're constantly

⁶¹² Interview with a Police Detective Sergeant, Region 2, 21st February 2018.

learning and improving how we do those investigations so that we're as effective as possible. So, when we've got a potential suspect, we're not letting them slip through the net, simply because of our lack of understanding or experience how to look at that type of crime.”⁶¹³

However, the extent to which the number of potential victims, and as a result potential investigations, had risen meant that region's two model was starting to migrate towards that reminiscent of that in region one, where initially, investigations would be mainstreamed into district or divisional police unless there was considered to be a significant regional, national or international aspect to the crime, or crimes where risk to victims was elevated; particularly those associated with sexual exploitation cases.⁶¹⁴

“Protective Services Crime (where the trafficking team are now based) will undertake to provide assistance to districts in the management and execution of investigations in order to ensure that they are not left vulnerable and isolated. HQ Crime will also assist in profiling Organised Crime and Organised Crime Groups (OCGs) and assist in the investigation of crimes that are deemed to be level two.”⁶¹⁵

In the other regions studied, the landscape was vastly different. These regions were mostly less metropolitan and more rural than regions one and two. While all had force SPOCs in place, these roles were often shared, meaning the force SPOCs in region four and five (rural and coastal south) also held responsibility for additional portfolios, such as domestic abuse and CSE. As a result, they had no option other than to mainstream investigations into local police, with larger operations escalated to Regional Organised Crime Units (ROCU) if necessary.⁶¹⁶

⁶¹³ Interview with a Police Detective Sergeant, Region 2, 21st February 2018.

⁶¹⁴ Interview with a Police Detective Sergeant, Region 2, 21st February 2018; Interview with a Police Detective Sergeant, Region 1, 16th March 2015.

⁶¹⁵ Interview with a Police Detective Sergeant, Region 1, 16th March 2015.

⁶¹⁶ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018; Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

In these areas with no or lower amounts of dedicated resource, there was a feeling that this meant action was limited to tackling the so called 'low hanging fruit'; specific known exploitation issues upon which much attention has been paid, such as in nail-bars, hand car-washes, and pop-up brothels. But in region five (coastal south), despite the focus on these 'low hanging' issues police reported that in actuality successful investigations had not been around car washes or nail-bars, leading them to think about the issue of exploitation more broadly; applying it to more localised issues, and generally taking a more pragmatic view of modern slavery as an issue that sits at the extreme end of a wider scale of labour exploitation.

"Once police start to get the idea that it's just a commodity... well it sounds horrible to say it like that... but just using people as a commodity, then it's quite traditional criminality, really. So, you can start using our traditional techniques around how we deal with organised crime and apply them quite effectively I think." ⁶¹⁷

"That's really where I've tried to trap-in the modern slavery portfolio head in this force is to highlight it... it's not niche business it's about actually a number of other crime types being dealt with modern slavery legislation and the benefits of, you know, the protection tools and the orders that we can use. So, if you look at that just around the force and then I've tried to get that knowledge spread out across partners in the anti-slavery partnership. That's... that's pretty much my... my struggle." ⁶¹⁸

This view was not only isolated to region five. Region three (rural north), another area with limited resource also discussed the idea of thinking about vulnerability more generally as opposed to introducing another potential area of confusion, and a specific area of worry amongst an already crowded, and continually evolving list of policing priorities.

⁶¹⁷ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

⁶¹⁸ Interview with a Police Detective Chief Inspector, Region 4, 9th March 2018.

“Being able to really explain and be clear to the staff as to what they need to be doing and not just thinking it’s another priority to worry about, and just deal with the vulnerability that’s there and it doesn’t really matter which of the vulnerabilities that it is. I think that can cause some confusion.”⁶¹⁹

Partnerships were also seen to be of benefit in an investigative sense. While nationally, statistics, as well as the personal reflections of police officers indicate that successful prosecution remains difficult, partnerships were sometimes able to offer alternative means of disruption to criminals, while in other alternate legislation such as anti-social behaviour orders or human trafficking risk and prevention orders were also being used as a means of disruption.⁶²⁰

“So, if we can’t do that, it’s for us to look at the problem to say how can we best disrupt this? How can we best dismantle this if it requires that work? Is it an organised crime gang? Is there a group of people who are causing a risk to members of the public.”⁶²¹

“...when they go to car washes or when they go to fishing vessels, or whatever the setting they are going with the national minimum wage team, they are going with the health and safety executive, they are going with the ‘region two’ environment agency, they are going with GLA.⁶²² They can also I think harness their employment agency inspectorate. So, I think operationally this is... they’re developing those operational partnerships until where they have... where they’re unable to secure evidence to justify a full-on modern slavery investigation. They’re still able

⁶¹⁹ Interview with a Police Detective Chief Inspector, Region 5, 18th July 2018.

⁶²⁰ Human Trafficking for the purposes of Sexual exploitation Problem Profile, Region 1, Personal Communication, 12th November 2015.

⁶²¹ Interview with a Police Detective Sergeant, Region 2, 21st February 2018.

⁶²² GLA; the Gangmasters Licensing Authority was renamed to the GLAA; the Gangmasters Labour and Abuse Authority in 2017, along with the granting of additional powers and a wider remit to deal with modern slavery issues.

to affect disruption of that organised crime group, through the use of multi-agency partnerships.”⁶²³

Similarly, the findings of the HMICFRS Stolen Freedom report also indicated that, generally, forces with formal provisions in place for multi-agency working tend to investigate more diligently crimes in their jurisdiction, in the process reaching better prosecution and victim protection outcomes. Police in region one also acknowledged the need to treat potential offences separate from NRM decisions, reinforced by guidance received from the office of the independent anti-slavery commissioner.⁶²⁴

“There are a number of immediate steps required to increase victim identification and ensure that offences do not go unreported. Once offences are reported there needs to be an immediate investigation, not a delay awaiting other processes by virtue of the National Referral Mechanism, the police investigation must not await a decision of the competent authority but will need to be coordinated.”⁶²⁵

In response to rates of prosecution, region one (large metropolitan) took the decision to try and work more closely with CPS to overcome challenges in achieving successful prosecutions.⁶²⁶ By making use of the specialist expertise embedded with the CPS, such as their ability to advise on appropriate charges in more complex cases, the force hopes to avoid, in future, the challenges associated with building up large complex cases against an OCG. These cases are, according to evidence gleaned in the study, often broken down and split into smaller cases, itself bringing problems as it makes it difficult to represent the larger picture of criminality to the courts.⁶²⁷

⁶²³ Interview with a central government representative, Region 2, 19th February 2018.

⁶²⁴ HMICFRS, “Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking.”

⁶²⁵ Letter to the Police Chief Constables from the Independent Anti-Slavery Commissioner, Region 1, Personal Communication, 22nd January 2015.

⁶²⁶ Force Human Trafficking Plans and Updates, Region 1, Personal Communication, 22nd September 2015.

⁶²⁷ Interview with a Police Detective Sergeant, Region 1, 6th May 2015.

“Basically, what happens currently, because CPS are not involved in cases from the start, the force builds up large cases, which may involve trafficker, exploiter, victim, OCG etc.... but later down the line CPS will split these into a number of smaller cases due to the logistical problems associated with bringing a massive case to court. However, there is a perception that this may be counterproductive in bringing responsible parties for justice as the ‘whole’ picture is then not appropriately represented in court as a large single entity.”

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11.3 MAINSTREAMING INVESTIGATIONS

Despite the classification of modern slavery as a serious and organised crime, the need to mainstream modern slavery investigations into local police has been observed; particularly in regions with limited or no resources to manage it as a discrete issue. In region one however, while dedicated resource and personnel was in place – it had a limited funding period, and a requirement was established for the dedicated anti-slavery unit to provide oversight to divisional police on investigations.⁶²⁹ The unit was formed as a mechanism to provide those divisional policing resource with access to the specialist experience and skills needed to conduct investigations effectively, including remotely if and when needed, as part of a broader initiative to mainstream the investigation of modern slavery, traditionally managed by serious and organised units, in to divisional forces, and in the case of larger level two or three investigations, where it is deemed additional resource is needed, play a more central role in the investigation itself.

“One off or issues that are perceived to be standalone are normally just handled by the appropriate district force, with the force trafficking unit providing support to district SPOCs [single-points-of-contact]. However, in cases where an incident is identified to be part of a larger trafficking

⁶²⁸ Interview with a Police Detective Sergeant, Region 1, 5th May 2016.

⁶²⁹ BBC News, “New West Yorkshire Police Team Tackles Human Traffickers,” 2015, <http://www.bbc.co.uk/news/uk-england-leeds-30835398>.

operation or linked to an existing case or operation then the force trafficking unit will likely become more central to the investigation.”⁶³⁰

At this most fundamental level the potential role of the central anti-slavery team as a knowledge capture mechanism is evident, providing a means to ensure consistency across investigations in the force area.

“The intelligence unit, and the distinct teams within it are regularly briefed and made aware of new and emerging crimes and force priorities through various mechanisms, primarily through online briefing documents and newsletters, in addition to tasking and coordination meetings.”⁶³¹

This ever-reproducing commitment intends to create a living organisational memory for modern slavery investigations, to ensure that lessons-learned and effective practice can be captured and cascaded force-wide. This approach hopes to address the traditionally acknowledged over-reliance on the existing knowledge and expertise that exist within the experience of individual officers. Through providing this oversight to those involved on the frontlines at divisional level, in the specific geographic district where a given investigation took place, it is hoped that situations which provide opportunity for investigative inconsistency across force will be alleviated, at least to some extent. In terms of mechanisms to cascade awareness and the prioritisation of modern slavery down through the police force to frontline workers, the tasking, coordination and briefing processes were singled out as a pivotal measure.

⁶³⁰ Interview with a Police Detective Sergeant, Region 1, 18th June 2015.

⁶³¹ Interview with Police Detective Chief Inspector, Region 1, 14th September 2015.

11.4 INTERNATIONAL PARTNERSHIPS

A common theme across the national policing doctrine is the desire to ensure the disruption and not just the displacement of crime, with the need for improved international partnerships and collaborative working also granted increased importance. One of the primary mechanisms for international working are joint-investigation teams (JITs) put together in collaboration with Eurojust and Europol. The JITs themselves facilitate the coordination of investigations and prosecutions across several member states.⁶³² The UK IASC has also undertaken an active role in the development of international partnerships, given the likely cross border nature of slavery cases.⁶³³ The JITs provide a cooperation mechanism, and enable the direct collection and exchange of information between competent authorities (judiciary, law enforcement, prosecutors) without the need to use traditional mutual legal assistance channels.⁶³⁴ In addition, greater effort has been spent to establish working relationships through existing success, such as the 'Antlerham' operation in conjunction with Slovakian authorities and through networking opportunities as a result of anti-trafficking conferences and initiatives across Europe in order to establish informal contacts and links.

"Europol also facilitate international joint investigations – very useful in this respect. Specifically, a recent joint investigation with Czech police was initiated successfully. However, there was some problems, as initial contact from Europol and Czech police was directed to 'region one' district force and not picked up on – should have been directed to force ATU." ⁶³⁵

While clear lines of contact exist to facilitate formal engagement through the mechanisms implemented through the likes of Europol and Eurojust, a participant

⁶³² Europol, "Joint Investigation Teams Practical Guide," 2019, <https://www.europol.europa.eu/publications-documents/jits-practical-guide>.

⁶³³ Letter to the Police Chief Constables from the Independent Anti-Slavery Commissioner, Region 1, Personal Communication, 22nd January 2015.

⁶³⁴ Europol, "Joint Investigation Teams Practical Guide."

⁶³⁵ Interview with a Police Detective Sergeant, Region 1, 18th June 2015.

from region one reported that it was not always easy to get support unless they had an existing relationship with someone who could be contacted directly.

“Europol, again, have information, but are mostly responsive if ‘you know a guy’ who can be contacted. The official mechanisms of contact are often not all that responsive or helpful.” ⁶³⁶

The comments made reflect only an individual’s perspective and experience, so any inference made as a result can only be speculative. However, the point expressed does reflect the commonly held view that this type of partnership thrives best in situations where the preconditions for trust, and working relationships already exist.

⁶³⁶ Interview with a Police Detective Sergeant, Region 1, 18th June 2015.

11.5 SUMMARY

Key Findings:

- Reviews since the findings since the introduction of the Modern Slavery Act 2015 have criticized the police's response; and in particular the diligence and overall quality of investigations.
- Like partnerships in general, cooperation and assistance from international organisations such as Europol worked best where pre-existing relationships existed with particular individuals.
- As modern slavery remained an emerging area for police, organisational memory and the turnover of experienced staff remained a key issue.
- Police forces without dedicated resource were found, in some regions, to be exploring ways of tackling modern slavery under a wider remit of vulnerability-based crime.
- Those forces with dedicated investigative resource had different approaches, with some areas preferring centralised control over all investigative aspects while others attempted to mainstream work into local police.
- While 'low hanging' issues such as labour exploitation in nail-bars and carwashes were prioritised, these were not necessarily areas where many successful modern slavery investigations had taken place, leading police to take a broader, more pragmatic view of labour exploitation.

The police's response to modern slavery since the Modern Slavery Act 2015's enactment has been met with stark criticism – with particular issues around the

quality and consistency of investigations cited in reports by Barrister Caroline Haughey and the HMIC inspection report; *Stolen Freedom*.⁶³⁷ This continued national attention however has spurred action across the country and there is clear evidence from across the five studied regions that measures have been taken to address shortcomings.

However, the extent of these measures varied from region to region. In some areas; particularly those containing major metropolitan hubs had allocated central dedicated resource aimed at responding specifically to modern slavery. Whereas other smaller and more rural forces had instead elected to directly mainstream the modern slavery agenda into existing capacity. In some cases, these forces were exploring ways of conceptualising modern slavery as vulnerability-based crime, so that work could be aligned more directly with areas such as CSE and domestic abuse. Forces with dedicated resource also had different approaches. In region two, a wholly centralised approach was preferred where all potential cases and intelligence was managed using dedicated resource, whereas region one's anti-slavery team were tasked with more of an oversight role, aiming to support and train local police; upskilling them so that future investigations could be fully mainstreamed.

Across the board work remained reliant on the skills, knowledge and enthusiasm of a few dedicated individuals, and police were seen to struggle to maintain momentum and continuity generally where there was staff turnover - reflecting the issues seen more widely with partnership work. This was also the case with international work; where cooperation and assistance through JITs worked best where pre-existing relationships already existed – particularly where there was a direct personal relationship.

Overall, from the nature of the conversations and information gleaned from the empirical data collection not much can really be assessed regarding the actual quality and diligence of investigations specifically (and this was not the intention

⁶³⁷ Haughey, "The Modern Slavery Act Review: One Year On"; HMICFRS, "Stolen Freedom: The Policing Response to Modern Slavery and Human Trafficking."

of the study). However, there was clear evidence of momentum and a cultural shift within each region. All areas were cognisant of a modern slavery issue within their respective jurisdictions, with some participants explicitly acknowledging that they personally had been previously sceptical of the extent of modern slavery's manifestation in their locality. However, much like the anti-slavery partnerships they are a part of, and in many cases drive, there was little evidence of thinking and measurement around what actually constitutes success, and partnerships seemed reluctant to take on additional responsibility for, what is largely, a voluntary endeavour.

12 DISCUSSION

The preceding collection of chapters has identified a number of positives and challenges with regards to victim identification, recovery and support that are in some way, driven or at least supported by collaboration through multi-agency anti-slavery partnerships; drawing upon information gleaned from research conducted across five regions in the UK. The content of those chapters has alluded to answers to the following overarching research questions and enabled the development of a conceptual framework for anti-slavery partnership work which encapsulates many of the promising practices identified during the study. The chapter summarises the overarching findings of those which preceded it and presents that framework.

- How are multi-agency partnerships being used to combat modern slavery across the UK?
- What impact do those partnerships have on the measures taken to identify and support victims?
- What impact do those partnerships have on efforts to suppress and disrupt traffickers and slave masters?
- What key challenges are there to be overcome to ensure the success of multi-agency partnerships and, more broadly the efforts to effectively eradicate modern slavery?
- What are the key principles of effective multi-agency approaches used in response to modern slavery?

By answering these core questions this study brings a number of contributions to knowledge. Primary research findings are supported by insights from existing and other ongoing work as well as additional information from media coverage, police and government strategy documents and my own continued engagement with modern slavery partnerships and the UK anti-slavery movement more broadly. In addition, a number of additional challenges have been established related to the investigation and prevention of modern slavery, and in particular, identification, referral and safeguarding, linking to the potential role, impact and benefit of multi-agency partnerships.

In particular, awareness raising and training among frontline workers, and within police forces themselves, have been noted as key positives. While the NRM continues to be scrutinised for not offering long term support for victims, NGOs have proven invaluable in some regions in providing extended victim support services, including accommodation - above and beyond the requirements of the NRM.

Regarding the role of partnerships specifically, such diversity in local contexts means it is difficult, or perhaps even misguided, to attempt to prescribe or cultivate a 'one-size-fits-all' approach. Instead bespoke strategies and tactics must be formed – and in many cases have been established, in order to effectively prevent, manage and respond to the specific issues within specific communities. While it is possible to cite specific cases, or refer to stereotypes such as the exploitation of eastern European males in hand car-washes, or Vietnamese women in nail-bars, which are perceived to have a degree of prevalence nationwide, the true nature of exploitation has a significant degree of contextual difference. Exploitation can, and does, vary between localities as a result of differences in the geographical, employment and socio-cultural landscape. Factors such as the availability of agricultural work, and demand for low cost labour in rural areas all play a key role in determining the prevalence of specific exploitation types. To some extent this variety contributes to the 'fog' around the understanding and estimations regarding the true nature and scale of trafficking. This diversity however provides some rationale justifying the necessity to ensure that prevention and prosecution strategies are comprehensive. It requires them to combine and coordinate resources at various different levels; from international and national collaborations, right through to the localised coordination of effort in individual districts.

12.1 HOW ARE MULTI-AGENCY PARTNERSHIPS BEING USED TO COMBAT MODERN SLAVERY?

Overall, the study found that each of the regions studied had in place some form of partnership arrangement – mirroring findings by ⁶³⁸ that identified a national ‘patchwork’ of partnerships all across the UK. Despite the near ubiquity of partnership arrangements, the structure, organisation and membership of partnership groups varied significantly from region to region, with different activities prioritised from partnership to partnership. Across all five regions, core activities included conducting awareness raising work, and rolling out training on how to spot potential victims. However, the specific ways in which these were implemented, and by who, did vary from place to place.

Understandably, the most common forms of direct partnership work existed between different statutory organisations with existing responsibilities related to modern slavery. These relationships and actions were usually driven by individuals within the police or a local authority, with other statutory organisations such as the GLAA and UKVI also proving to be frequent collaborators. Work by these groups was often directed in the areas of initial victim identification and intelligence acquisition, often focused around national days of action targeting vulnerable areas such as carwashes and airports.

Collaboration with NGOs was generally more piecemeal, reflecting that concentrations of NGOs were usually located within cities or larger metropolitan areas had significant NGO infrastructure. Rural areas in particular seemed to exhibit lower levels of NGO engagement due to the lack of local NGOs working in the anti-slavery space in those areas. The process of working with NGOs was also more complex. Whereas statutory organisations generally had shared or overlapping mandates, working with NGOs often required finding shared ground, and establishing informal memorandums of understanding in order to progress

⁶³⁸ Gardner, Brickell, & Gren-Jardan (2018)

cooperation. Work with NGOs more frequently focused on the complexities of victim-care pathways, establishing agreements for the provision of extended support for victims beyond the amount required by the NRM, and the provision of specialised services for victims and survivors.

12.2 WHAT IMPACT DO THOSE PARTNERSHIPS HAVE ON VICTIM IDENTIFICATION AND SUPPORT?

The most common narrative among key voices within the UK's anti-slavery movement is that the legal provisions that exist do not go far enough to help potential victims of modern slavery throughout the care journey, meaning that individuals are at risk of being missed or disregarded at all point of the victim care journey. Revisions to the NRM in recent years have extended the period of support for victims indefinitely, however the quality and quantity of services available in addition to broader structural issues mean that many stakeholders, including survivor advocacy groups, charities and statutory organisations, still recognise that the UK still falls well short of providing an approach that is truly victim focused.

This is in no small part due to the currently political climate and the UKs immigration policies, both of which create concerns over the extent to which victims from outside the EU are referred and supported. Despite this, partnership work across the five regions studied has resulted in some promising practices, with indications that victim detection rates have improved, and local NGOs have proven pivotal in provided addition support beyond the minimum requirements of the NRM, in addition to providing vital links between statutory authorities and vulnerable and marginalised groups – particularly those which have historically fractious relationships with police.

Other concerns also persist. The NRM itself remains a process over which there is much scrutiny and efforts piloted to increase its effectiveness and efficiency of the victim referral process have been met with indifference and have resulted in little tangible benefit in the speed of referral or the number of successful referrals. There is no current plan to adopt the pilot scheme in other areas of the UK.

Across all the regions studied, measures have been established to improve the levels of awareness of the modern slavery issue generally, in addition to rolling out more specialised ‘spot the signs’ training for frontline workers, usually within statutory organisations, in roles where there is interaction with the general public. In addition, partnerships have been keen to establish ‘victim-care pathways’ to map the victim journey from initial identification through NRM, highlighting where responsibilities lie. In each region, further work to provide victim reception centres or additional support were also in place, often self-funded or resulting from small grants.

While there was general consensus across the partnership regions studied that this has made a genuine difference to the number of victims referred and the efficiency at which their cases were managed, there was a lack of output focused analysis as to the direct impact of this work. Widespread training rollout and awareness campaigns were often attributed as the cause of (temporary) spikes in police intelligence throughput and initial NRM victim referral. However, across each region studied monitoring and evaluation of the impact of this input-focused work was mostly limited to counting numbers of people trained and trends in the numbers of victim referrals, as opposed to more detailed work aimed at discerning the levels of understanding staff had of the issue and the processes in place to report it.

The perceived success of these initiatives was also highly dependent on organisational commitment – often typified by the interest of individuals within them in recognising and engaging with the anti-slavery agenda. In some areas, even despite some organisations having direct statutory responsibilities for things like adult-safeguarding, engaging them in partnership work with others involved in the victim-care chain was not always evident.

Across all regions, police were seen to have invested time and resource into training and upskilling their staff, from basic awareness work through to specialist investigator training. As central drivers of partnership work, it was visible that their increased awareness and position had been used as a lever to encourage local

engagement from others in helping to develop and deepen understanding of common venues of exploitation.

12.3 WHAT IMPACT DO THOSE PARTNERSHIPS HAVE ON EFFORTS TO SUPPRESS AND DISRUPT PERPETRATORS?

Post Modern Slavery Act 2015 reviews of the policing response to modern slavery have been critical, despite acknowledgement of progress. In particular the quality and diligence taken during investigations has been repeatedly cited as a key issue in landmark reports by Haughey.⁶³⁹ Despite this, the study found police forces that were willing to innovate in the face of austerity and other priorities competing for time and resource. In areas, often rural forces with smaller resources – police were exploring ways of integrating efforts to combat modern slavery under a broader remit of vulnerability-based crime, acknowledging that force SPOCs often held the portfolio for modern slavery work alongside other issues such as CSE and domestic abuse.

A number of the forces studied had dedicated resource in place, but their approaches differed. Some forces preferred centralised control over intelligence and investigations related to modern slavery, while others – in recognition of limited funding and the potential for new priorities to supersede modern slavery on the policing agenda – attempted to mainstream work into local forces, as they would with most other forms of crime. Across all the areas studied, there was recognition that the approaches being adopted were regionally appropriate considering resource constraints. Across the board however, staff churn remained a significant problem. This was observed as a trend across all regions and organisations, with the modern slavery agenda reliant on key policy entrepreneurs to drive activity forward.⁶⁴⁰ High levels of churn across organisations meant that momentum frequently stalled as key individuals changed roles or organisation. For

⁶³⁹ Haughey (2016) and the HMICFRS (2017)

⁶⁴⁰ Gardner, “An Idea Whose Time Has Come? Modern Slavery, Multiple Streams Approach and Multi-Layer Policy Implementation.”

the police and Local Authorities specifically, turnover of experienced staff – typically due to retirement, meant that core knowledge of the issue accrued over the last ten years via experiential means was often lost, often in tandem with a significant amount of momentum in that specific area.

Though some areas did specifically cite rollout of specialist courses for police investigators, this was typically done internally – ‘by police for police’ and not inherently connected to partnership activity. Police, as primary drivers of partnership work in many areas nationally, and in all of the case-study regions of this research, were also a core delivery organisation for basic awareness raising and ‘spot the signs’ training for other organisations, particularly those with statutory responsibilities. But the impact of training input was not always monitored outside of quantifying the numbers of people to whom it had been delivered. As the mean length of police anti-slavery investigations and prosecutions amounts to several years, it is probably too soon to look for improved rates of prosecution as a measure of success. However, it was clear that forces did not have systems in place to monitor and evaluate change, and in some cases did not really know what to monitor and measure in order to assess progress. The lack of meaningful progress tracking was also found to be an issue attributable to other aspects of partnership work generally.

Efforts to raise the profile and awareness of the modern slavery issue were linked to improved levels of recognition and intelligence throughput from police. However, the vast majority of incidents and intelligence were seen to still come from the police themselves in some areas, with limited throughput from other statutory organisations and NGOs, leading the police to question the long term impact of awareness focused ‘spot the signs’ training beyond providing initial spikes in information and intelligence from partner agencies. One of the reasons cited as a potential reason for was a lack of feedback. It was believed that whilst training gave confidence to individuals to report issues, a lack of feedback

following initial reports on how or if it was used often killed enthusiasm for further reporting.⁶⁴¹

In addition, limited success was also seen through a number of targeted national days-of-action in collaboration with other statutory organisations – such as HMRC, the environment agency and the health and safety executive. Alongside these, most success was seen against widely recognised ‘low hanging fruit’ issues aimed at tackling forced and exploitative labour in at-risk business types such as hand car washes and takeaway restaurants.

International partnership approaches were also utilised with some successes, particularly through organisations like Europol to pursue investigations on perpetrators that had fled overseas. However, like with the partnership approaches observed more generally during the study these worked best where pre-existing inter-personal relationships were already in place with particular individuals – and official cooperation mechanisms were not always deemed to be timely or effective.

12.4 WHAT KEY CHALLENGES ARE THERE TO OVERCOME TO ENSURE THE SUCCESS OF MULTI-AGENCY PARTNERSHIPS?

While there is much promise and some success to be taken from efforts observed through this study, the UK’s anti-slavery infrastructure is set against a backdrop of exclusionary immigration policy and labour market deregulation.⁶⁴² These factors do much to undermine efforts on the frontlines and foster the conditions under which extreme forms of labour exploitation thrive, by compounding the vulnerability of those considered most at risk. Therefore, frontline work, while continuing to ensure that the negative impact and implications of these structural

⁶⁴¹ Interview with a central government representative, Region 2, 19th February 2018.

⁶⁴² Lewis and Waite, “Asylum, Immigration Restrictions and Exploitation: Hyper-Precarity as a Lens for Understanding and Tackling Forced Labour.”

issues is known, must work within and around these constraints to identify and offer support and respite for victims and survivors.

In this regard, positive work was seen across the board. But despite this none of the regions studied had in place formal processes or mechanisms to evaluate activity in a meaningful or systematic way. From a policing point of view both the UK and NI national modern slavery strategies contain 'measures' for successes, these include:

- media reporting of operational successes;
- number of awareness sessions delivered to each target audience;
- victim referrals and support figures;
- calls to the Modern Slavery Helpline;
- number of modern slavery and human trafficking crimes recorded;
- crime survey figures on public awareness.

However, these measures while at a basic level can be used to assess progress in moving the anti-slavery agenda forward, they fail to adequately establish whether the quality of service provided to victims, or the quality or consistency of investigations, is adequate or improving. Instead, they focus on things which are easier to measure.

Despite the prominent policy positioning of modern slavery work, widespread public sector spending cuts under government austerity measures have meant that funding dedicated staff and activity has remained a challenge for both individual organisations and partnerships. Partnerships themselves have no statutory footing, instead relying on statutory organisations, typically the police and local authorities to fund work. In some areas, typically larger metropolitan areas, small dedicated teams or individual staff were allocated, but smaller areas often had to mainstream anti-slavery work into existing teams and roles, competing alongside other agendas and priorities.

This is understandable, and links to a key challenge that the anti-slavery at large must be equipped to navigate when the time comes. The Modern Slavery Act has afforded this agenda a prominent place in the policy discourse since 2015, particularly if we look at the issue from a crime and security perspective, but it's unlikely this will last forever. Instead, as other issues begin to take the limelight, occupying the prominent media coverage, anti-slavery must be normalised into existing process and practice in order to be sustainable, and in order to ensure that victims continue to be identified, the needs met, and their exploiters investigated and prosecuted.

12.5 A CONCEPTUAL FRAMEWORK FOR MULTI-AGENCY ANTI-SLAVERY PARTNERSHIPS

Although the study has identified that a number of structural issues currently inhibit efforts to implement an effective and truly victim focused national approach, a number of promising practices have been evidenced. In this final section, these practices are discussed and a conceptual model of what effective place-based multi-agency partnership work could include – based on what has been identified as promising or effective in *this* study, is developed.

However, despite evidence of promising practices and the presence of an almost ubiquitous network of place-based partnerships around the country, there remains no statutory footing and little central guidance for how they should operate and the activities they should undertake. While on the surface this may seem like a limitation, and in some ways does continue to hinder efforts, these constraints have provided an environment that has fostered innovation. The autonomy afforded local and regional structures has allowed partnerships to develop organically, organised around local conditions – from both organisational and issue-based perspectives. Work is shown to generally benefit from the allocation of specific resource or personnel within key organisations such as the police, local governments and NGOs, allowing work to be coordinated and conducted to tackle key issue areas. Different regions have in some cases been

able to establish local groups to work in smaller sub-regions thus been able to form sub-groups been able form sub-regional sub groups to focus on smaller geographic areas, or on specific issues such as homelessness or sexual exploitation in areas where specific challenges are prominent.

In all cases, a key barrier still remains related to the fostering of commitment within specific organisations. Partnership approaches are seen to thrive where there is commitment and enthusiasm for engagement with the anti-slavery agenda within key statutory authorities – often through individual ‘special people’, in the face of competing agendas and the longstanding effects of austerity.

The framework is broadly divided into four thematic areas; awareness raising and training, information and intelligence, victim identification and support, and threat reduction and prosecution. These are aligned to the four discrete results chapters (7-11) in this thesis, themselves formed from the core themes that emerged during analysis of the primary data. Activities relating to these thematic areas are visualised from input to output along a vertical axis, detailing intended outcomes, and identifying some baseline outcomes that be used to indicate the extent to which activity can be deemed promising or effective.

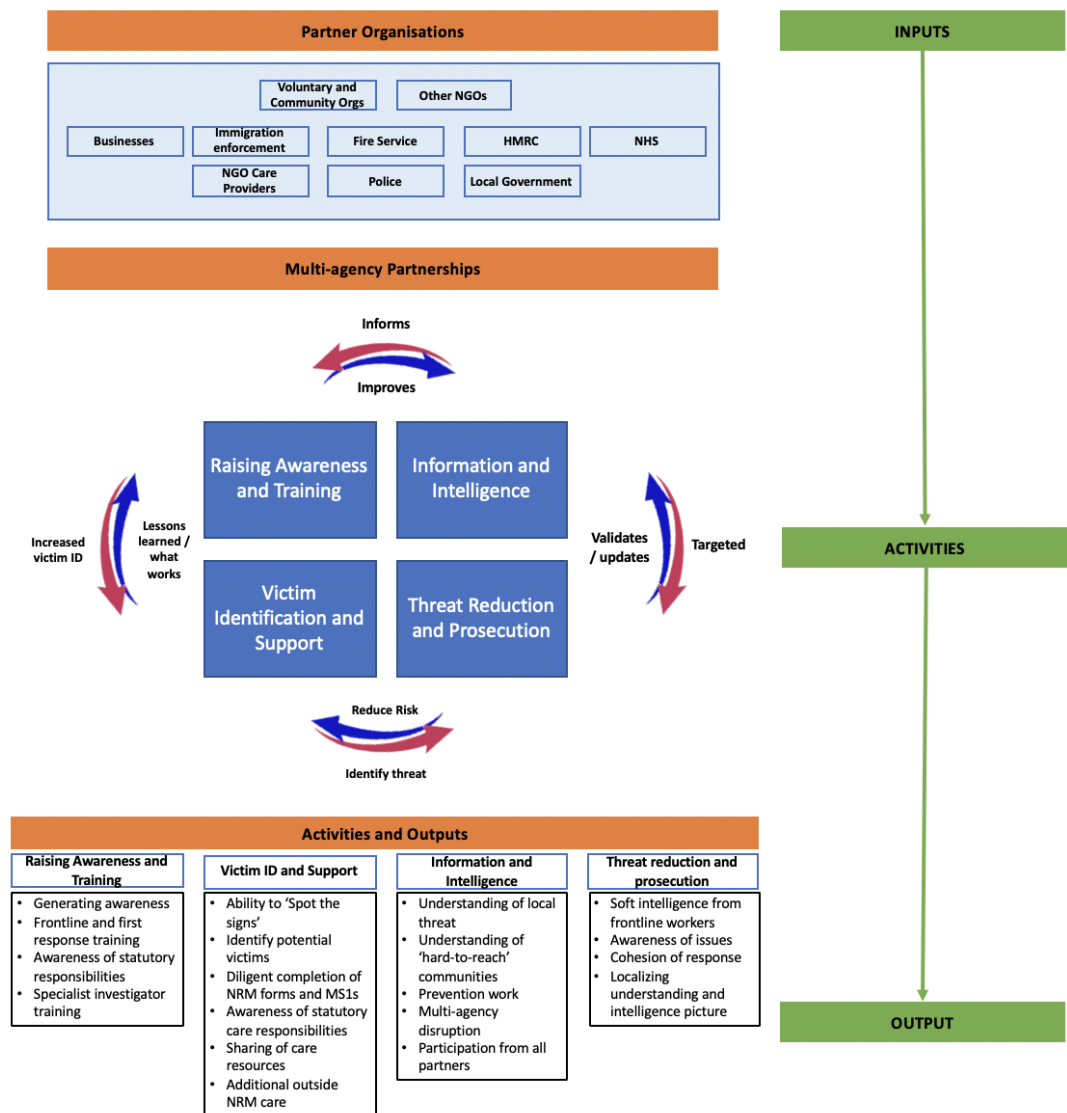


Figure 10: Model of effective partnership work

But the outputs discussed here should be considered by no means exhaustive. Subsequent work is required to supplement the results of the thesis, and research being conducted in collaboration with the Independent Anti-slavery Commissioner and Home Office modern slavery police transformation programme to update the resources available to support partnership development. Work should continue to refine guidance provided by existing toolkits, such as that from the University of Nottingham and IASC, advising on effective partnership working

practices, building the evidence-base and taking lessons-learned from partnerships operating across the country.⁶⁴³

At the summit of the model is the partnership structure itself. While there is no prescriptive approach included dictating how this should be formed or organised, a number of core beneficiaries are included; the Police, local government and local NGOs – particularly those such as the Salvation Army who hold the central government contract for accommodating potential victims, and others which are locally active in providing support and victim services. In terms of placement, those partnerships studied were aligned to police force boundaries – reflecting the key role of the police in building momentum in the anti-slavery agenda. However, the value of sub-groups to tackle specific issues, or to focus on specific (smaller) geographic areas is also encouraged in areas where resourcing allows, or where there is already specific infrastructure in place around linked issues such as homelessness, child protection or sex work.

The first output within the model, like the first chapter in the results section of this thesis, focuses on awareness raising and training. Results from the research suggest that by conducting a number of activities in this area, such as providing targeted awareness campaigns to local businesses and the wider public, and providing training opportunities for those within public facing roles (particularly with statutory organisations such as local authorities, the fire service and the healthcare sector), a wider understanding of local risk can be developed. Specialist training for those in statutory and legal first responder positions should also be considered. Such training was observed to enable greater awareness of statutory responsibilities, such as the duty to notify potential victims to the home office, and existing care responsibilities under the care act, providing a vital input to improve national understanding of the issue, and enhancing local implementation.

⁶⁴³ In 2018 the University of Nottingham, in collaboration with the Independent Anti-Slavery Commissioner, launched an online resource providing guidance for anti-slavery partnerships; University of Nottingham, “Anti-Slavery Partnerships Toolkit.”

This also links to intelligence and information acquisition, use and sharing. Targeted work to train and raise awareness in combination with commitment to multi-agency working and information exchange can be used to create localised and dynamic appreciations of risk and vulnerability. Organisations outside of the police, such as those in public facing roles, and in particular NGOs who work with and within communities that have been traditionally considered insular can provide vital information on potential vulnerability which may otherwise have been considered as a gap or blind spot. This can be used to tailor awareness raising initiatives to areas of high risk and develop other targeted interventions.

In some areas, promising practice has been evidenced in the creation of 'soft-intelligence' processes, providing streamlined ways for partners to submit information of interest. These processes, often implemented as simple dedicated email inboxes, were shown to be useful in increasing intelligence throughput. However, sustaining long term increases in that throughput were found to be challenging. This highlights the importance of ensuring that partners are informed of the importance of that information, and that the learning from it fed back to them to increase their own understandings of local threat and vulnerability, demonstrating the continued value of their contributions and participation in the partnerships more generally.

Resulting from the cascading of awareness raising and training materials, and the implementation of local information and intelligence sharing approaches, a key outcome is the desire to improve victim identification and support measures. In addition to 'spot the signs' focused work, training on more specific areas was also considered key. In particular, guidance and agreement on how best to complete NRM referral forms was identified, in addition to generating a wider appreciation of risk and responsibility. Although some potential victims may elect to not be referred, and others may not meet criteria to be conclusively adjudged to be a modern slavery victim – they may still be at risk and may still be entitled to some form of support or assistance.

Partnerships can also play a vital role in ensuring that organisations are aware of their respective statutory responsibilities, galvanising commitment from different statutory organisations and helping them to understand their respective roles within victim referral and support chains. Not only can work in this space contribute to increasing the number of potential victims initially referred to the NRM, it should also increase the numbers of duty to notify forms completed for potential victims who do not consent to referral. Moreover, dialogue between partners can also play a role in improving the quality of referrals made – ensuring that all pertinent information is included to assist both reasonable and conclusive grounds decisions.

From a victim protection standpoint specifically, key benefits have been observed. In some areas clear victim care pathways have been established, highlighting core responsibilities and statutory requirements for all aspects of the victim-care journey. Anti-slavery work is potentially unique in that victim profiles can be incredibly broad. Children, adults, those with additional care requirements, and equally those with without, can all potentially fall victim – and the needs and legal requirements for support can vary from case to case. Moreover, some victims may have recourse to public funding, while others may not. Some may require mental health support, and others support for immigration and leave-to-remain claims. Therefore, partnership work was seen to be most effective where victim-care pathways that mapped all eventualities were used not just as a lever to engage organisations with partnership work, but also as the means to foster commitment and coordinate care and other initiatives across the partnerships.

It is also advised that care providers and local authorities remain cognisant of vulnerability. Although individuals may return negative NRM decisions, this does not constitute as an indicator that there is no vulnerability. Even those without positive NRM decisions may be vulnerable or at-risk, and entitled to public services and support. Moreover, the potential complexity of modern slavery cases means that even those that *are* victims may not meet traditional care thresholds and thus may be at risk of falling through the support system, plunging them back into situations of precarity.

Victim identification itself has also seen to benefit in some areas due to the combined effects of awareness raising activities, the rollout of targeted training and efforts to engage partners with the local intelligence picture by sharing information and encouraging the submission of soft intelligence to the police.

From a strictly policing perspective, multi-agency partnership-based work can also play a role in enforcement. Successes have been seen resulting from multi-agency visitations to business that are considered at-risk; such as hand-washes, takeaway restaurants and nail-bars. By visiting these businesses with organisations including HMRC, the fire service and environmental health, while they often do not uncover modern slavery cases directly – they have proven effective in raising awareness and deterring non-compliance with labour, health and safety, fire and other regulation. Due to the difficulties in building cases around extreme forms of forced labour prosecution under the Modern Slavery Act 2015 can be difficult, but by ensuring that other breaches of labour and other forms of compliance are proactively targeted, police have been able to reduce levels of potential risk.

Existing inspection regimes by non-police agencies can also be valuable. For example, the fire service or environmental health, organisations that already carry out regular inspections around fire-safety and hygiene, often have visibility into businesses directly and are ideally placed to spot the signs of potential exploitation during existing visits.

12.6 CONCLUSIONS & POLICY RECOMMENDATIONS

As the UK's first in depth study into the role of anti-slavery partnerships, this thesis demonstrates empirically *why* partnership approaches are an important element of anti-slavery work, and how partnerships impact work in practice. It shows how, against a backdrop of structural challenges, place-based multi-agency work can contribute across all aspects of the national anti-slavery agenda in both the identification and support of victims and survivors, and in the pursuit of offenders and the reduction of threat. The project also identifies that while partnerships are present in almost all areas of the UK, they are currently underrepresented in the national anti-slavery agenda and policy discourse, and their role currently undervalued.

Despite these barriers, the research has shown that partnerships have grown organically into a vital element of the national anti-slavery movement. Often led by passionate 'special' individuals, these partnerships have innovated and brought together the resources of statutory, non-statutory and third sector organisations to deliver support services, raise awareness and assist in victim identification – often without dedicated funding and amongst competing priorities. They have helped to highlight deficiencies in the national infrastructure – namely the NRM, and have lobbied for change in policy and legislation, whilst simultaneously assisting organisations to meet their statutory responsibilities and close existing policy implementation gaps at the local level.

The study also provides methodological contribution to knowledge. It utilises a single-case design with multiple embedded units of analysis, spread across five-regions of the UK. It frames multi-agency partnerships as a single-case study due to their shared contexts and shared (overall) objectives, allowing for a greater basis of comparison. However, while positioned as a single case, the research also finds and acknowledges significant differences in the organisation of partnerships across each of its embedded units of analysis, and the way different activities are undertaken and prioritised by those working in different regions. This was often found to be due to differences in resource availability, or variations in the way

different elements or manifestations of modern slavery are prioritised by different localities, and differences in the socio-economic landscape in those areas.

The research culminates in the establishment of a conceptual framework that both encapsulates core elements of ongoing anti-slavery partnership work and provides a future framework for improving effective process and practice in this area. This theoretical contribution provides a vital means to help frame the importance of place-based partnership work more centrally within the national anti-slavery policy discourse.

The conceptual model itself provides a tool for partnerships to frame their work, complementing the 4Ps (Prevent, Prepare, Protect and Pursue) policing framework that currently governs anti-slavery activity. This is particularly key in areas where police are the core drivers of activity as the new model clearly and directly signposts how partnerships can have impact on both victim and crime focused activities. It can also be used as a tool to encourage thinking about ongoing appraisal of partnership activity. While current efforts are often limited to counting the number of people trained or exposed to materials, the model, by presenting activity types and a sample of related outputs, can be used to promote ongoing monitoring and evaluation.

This is particularly important as the research found that although partnership engagement and the introduction of new processes sometimes resulted in short-term improvements to intelligence throughput or initial victim referrals, these were not sustained over time. Moreover, practitioners will require training on an ongoing basis as new forms of exploitation become more pervasive. County lines child exploitation, as one example, introduces different safeguarding challenges than adult labour exploitation in businesses such as carwashes and the agricultural sector, requiring additional considerations and potentially the involvement of different stakeholder organisations – such as the youth offending service, and NGOs that work specifically with children.

Based upon the project's results, there is clear scope to push place-based multi-agency partnerships up the national anti-slavery policy agenda, ensuring their

value is represented within the national discourse and key documentation such as the national modern slavery strategy. An increased national emphasis on partnership working could go some way to reducing the strain on the key local entrepreneurs that the agenda currently relies upon to move forward. A formal guidebook produced in collaboration with these key ‘special people’ from around the country’s place-based networks, in collaboration with academics and the IASC could also be developed as a key policy lever, mirroring similar work that has been done around victim care through the Human Trafficking Foundation’s Survivor Care Standards.⁶⁴⁴

Acting as a lever, these results should be used to draw attention nationally to the need for dedicated funding for partnership coordination and activity at the local level. This should reflect the sometimes-vital role that partnerships have played in helping organisations meet their statutory requirements to victims via the NRM, and their facilitation of the coordination needed in order to provide a satisfactory service to victims within (and outside) the minimum support period. Formal national attention to partnerships could also play an important role in signal-boosting the need for wider engagement. Organisations such as businesses, many of which already have to meet their supply-chain transparency requirements under the Modern Slavery Act, also have the potential to play a wider roll within the community, preventing exploitation, raising awareness of issues and even providing employment opportunity to survivors – as examples.

⁶⁴⁴ Roberts et al., “The Slavery and Trafficking Survivor Care Standards.”

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APPENDIX

1. LIST OF DOCUMENTATION ANALYSED

ID	Document Name	Type	Date Produced	Connected Region
1	Human Trafficking Daily Intelligence Flags	Other	22/06/2015	1
2	Human Trafficking in Region 1 Intelligence report	Intelligence	01/09/2014	1
3	District X Human Trafficking Communications Flow Chart	Partnership	30/06/2016	1
4	Operation Anchorpoint Storyboard	Other	10/02/2014	1
5	Force Anti-Trafficking Unit Guidance and Intelligence System Logging	Other	18/06/2015	1
6	Region 1 Anti-Trafficking Unit Team Report Jan-June2015	Internal Report	18/06/2015	1
7	Region 1 Human Trafficking Baseline Assessment [Intelligence product]	Intelligence	01/08/2013	1
8	District X Human Trafficking Soft Intelligence Referral Form	Other	10/09/2015	1
9	District X Anti-Trafficking Network Agenda	Partnership	14/09/2015	1
10	District X Human Trafficking Action Plan 2015-2016	Internal Report	21/09/2015	1
11	Region 1 Intelligence Picture Human Trafficking District X 2015	Intelligence	21/08/2015	1
12	Human Trafficking and Modern-Day Slavery District X First Responder Referral Flowchart	Other	15/12/2015	1
13	Trafficking in Human Beings Multi-Agency Training Event	Other	03/09/2015	1
14	Force Central Intelligence Terms of Reference	Internal Report	14/09/2015	1
15	District X Anti-Trafficking Network Meeting Minutes	Partnership	14/09/2015	1
16	Information on Trafficking Types (District X)	Internal Report	14/09/2015	1

17	Force Intelligence Bureau Inland Immigration Process	Internal Report	18/09/2015	1
18	Force Intelligence Bureau Border Immigration Process	Internal Report	18/09/2015	1
19	Force Intelligence Bureau Human Trafficking Process	Internal Report	18/09/2015	1
20	District X Human Trafficking and Modern-Day Slavery Briefing	Internal Report	01/01/2016	1
21	Total NRM Referrals by Force	Internal Report	01/01/2016	1
22	District X Human Trafficking and Modern-Day Slavery Meeting Minutes	Partnership	01/02/2016	1
23	District X Human Trafficking and Modern-Day Slavery Meeting Minutes	Partnership	04/12/2015	1
24	District X Human Trafficking Useful Links for First Responders	Other	16/12/2015	1
25	District X Human Trafficking and Modern-Day Slavery anti- trafficking plan	Internal Report	01/12/2015	1
26	District X Human Trafficking reporting form	Other	21/10/2015	1
27	Region 1 Anti-Trafficking Network Meeting Minutes	Partnership	20/03/2015	1
28	Region 1 NRM Pilot Presentation	Other	18/09/2015	1
29	Region 1 NRM statistics 2015	Other	01/01/2016	1
30	District X Trafficking statistics 2015	Internal Report	16/12/2015	1
31	Stronger Together Leaflet in 8 Languages	Other	18/10/2015	1
32	Who are the Region 1 Anti- Trafficking Network?	Partnership	18/06/2015	1
33	Region 1 Anti-Trafficking Network Terms of Reference	Partnership	18/06/2015	1
34	Region 1 Anti-Trafficking Network Minutes	Partnership	13/01/2015	1
35	Human Trafficking for Sexual Exploitation – Region 1 Problem Profile	Intelligence	01/10/2015	1
36	Region 1 - Reasons for Forced Labour [Intelligence Product]	Intelligence	24/07/2015	1

37	Region 1 Anti-Trafficking Network Yearly Review 2015	Partnership	01/01/2016	1
38	Region 1 Modern Slavery Counting Rules 2016	Internal Report	14/01/2016	1
39	Region 1 Modern Slavery Control Strategy - 2016	Internal Report	05/05/2016	1
40	Region 1 Modern-Day Slavery Intelligence Picture Dashboard	Intelligence	01/03/2016	1
41	Region 1 Trafficking in Human Beings planning Day 2016	Other	05/05/2016	1
42	Region 1 Policing Plan 2013-2018	Internal Report	01/01/2014	1
43	Region 1 Anti-Trafficking Unit R12 Tasking Report Jan 2016	Internal Report	01/01/2016	1
44	Region 1 Active Investigations as of 20th Nov 2015	Internal Report	11/11/2015	1
45	Region 1 Live Operations and Investigations May 2015	Internal Report	11/05/2015	1
46	CONTEST - 4 Ps Modern Slavery strategy	Other	01/01/2015	Region 1 / ALL
47	NRM Victim Reporting Guidance for Competent Authorities and Front-Line Workers	Other	16/02/2016	ALL
48	Crime Recording Guide 01	Other	01/01/2016	Region 1 / ALL
49	Crime Recording Guide 02	Other	01/02/2016	Region 1 / ALL
50	Force Human Trafficking Risk Report August 2015	Internal Report	01/09/2015	1
51	Region 1 Memorandum of Understanding with NGO	Other	18/05/2015	1
52	Action to be taken to support immigration enforcement intelligence requirements	Internal Report	26/10/2015	1
53	Police Officers aide memoire inland lorry drops	Internal Report	15/10/2015	1
54	Force Human Trafficking Action Plan Updates [September 2015]	Internal Report	27/09/2015	1
55	Human Trafficking Strategic Risk Updates Aug 2015	Internal Report	01/08/2015	1
56	Force control Strategy Trafficking in Human Beings 2016	Internal Report	01/05/2016	1

57	Modern-Day Slavery Flow Chart for Region 1 Divisions	Partnership	01/11/2015	1
58	Kevin Hyland (IASC) Introductory Letter	Partnership	22/01/2015	ALL
59	Modern Slavery Plan, actions and updates	Internal Report	30/01/2015	1
60	R7 Report - General partners and Operations - May - June 2015	Internal Report	18/06/2015	1
61	R8 Report – Operations July 2015	Internal Report	01/07/2015	1
62	Operations Review August 2015 (CONTEST organised)	Internal Report	14/09/2015	1
63	Protective Services Crime Operation Review	Internal Report	16/09/2015	1
64	Region 1 Modern Slavery Strategic Delivery Plan 2015-2016	Internal Report	24/12/2014	1
65	Threats - Prevent / Pursue (Partners)	Partnership	11/01/2016	1
66	Joint Working agreement to tackle forced labour - ACPO UKBA GLA and CPS	Other	Unknown	ALL
67	Victim Stats Region 1, November 2015	Internal Report	01/11/2015	1
68	Action Plan of Human Trafficking Investigation Sub-Group [District Y]	Partnership	06/10/2015	1
79	27092015 – Human Trafficking Sub-Group Prevention [District Y]	Partnership	27/09/2015	1
70	Human Trafficking Lessons Learned [District Y]	Partnership	16/04/2015	1
71	Notes of the Human Trafficking Task and Finish Group April 2015 [District Y]	Partnership	16/04/2015	1
72	Action Plan - Human Trafficking Sub-Group [District Y]	Partnership	13/11/2015	
73	Victim Care Group Action Plan [District Y]	Partnership	27/09/2015	1
74	Priority 2 - Intelligence and Evaluation [District Y]	Partnership	28/08/2015	1
75	Modern Slavery Draft Action Plan [District Z]	Partnership	27/11/2015	1
76	Process Flow Chart [District Z]	Partnership	27/11/2015	1

77	Human Trafficking / Modern Day Slavery Response flowchart [District X]	Partnership	23/12/2015	1
78	Human Trafficking Action Plan 2015/2016 [District X]	Internal Report	26/07/2015	1
79	Human Trafficking Referral Form [District X]	Partnership	23/09/2015	1
80	Human Trafficking Action Plan 2015 [District W]	Internal Report	17/06/2015	1
81	Human Trafficking Forum Aims and Objectives [District W]	Partnership	25/06/2015	1
82	Human Trafficking Forum Terms of Reference [District W]	Partnership	17/06/2015	1
83	Challenges to District Forums [District Forum Guidance]	Partnership	27/04/2015	1
84	Creating a District Forum [District Forum Guidance]	Partnership	14/09/2015	1
85	Human Trafficking Task and Finish Terms of Reference [District Forum Guidance]	Partnership	17/03/2015	1
86	Report to divisions of progress of Human Trafficking Forums [District Forum Guidance]	Partnership	01/06/2015	1
87	Region 2 Draft Modern Slavery Strategy	Internal Report	01/02/2018	2
88	Engagement Group on Human Trafficking Terms of Reference	Partnership	28/04/2017	2
89	Terms of Reference – Organised Crime Task Force Immigration and Human Trafficking	Partnership	25/10/2017	2
90	Terms of Reference for Liaison Group on Human Trafficking	Partnership	02/10/2015	2
91	Safer District A sub-group Terms of Reference and Outcomes 2017	Partnership	02/10/2017	5

2. FULL LIST OF INTERVIEWS

Region	Organisation / Role	Type
Region 1 (Large Metropolitan)	<ul style="list-style-type: none"> • Police / Detective Sergeant #1 • Police / Detective Sergeant #2 • Police / Detective Constable • Police / Detective Sergeant #1 • Police / Detective Sergeant #1 • Police training event (various) • Police / Detective Chief Inspector (Human trafficking lead and head of force intelligence) • Police / Detective Sergeant #1 • Police / Analyst • Police / Detective Sergeant #1 • 12 people, various roles (Multiple NGOs, local authority figures inc. safeguarding leads, immigration enforcement) 	<ul style="list-style-type: none"> • 05-2015 Interview • 05-2015 Interview • 05-2015 Interview • 03-2015 Field memo • 06-2015 Field memo • 09-2015 Field memo • 09-2015 Interview • 09-2015 Field Memo • 09-2015 Field Memo • 09-2016 Interview • 02-2017 Focus Group
Region 2 (Devolved)	<ul style="list-style-type: none"> • Police / Detective Chief Inspector • Police / Detective Sergeant • Central Government 	<ul style="list-style-type: none"> • 02-2018 Interview • 03-2018 Interview • 03-2018 Interview

Region 3 (Rural North)	<ul style="list-style-type: none"> • Police / Detective Inspector • Police / Detective Inspector 	<ul style="list-style-type: none"> • 01-2017 Interview • 02-2018 Interview
Region 4 (Rural South)	<ul style="list-style-type: none"> • Detective Chief Inspector (force human trafficking lead) 	<ul style="list-style-type: none"> • 03-2018 Interview
Region 5 (Coastal South)	<ul style="list-style-type: none"> • Detective Chief Inspector (force human trafficking lead) 	<ul style="list-style-type: none"> • 07-2018 Interview