

Adults and Safer City Scrutiny Panel

12 June 2018

Report title	Modern Slavery Update	
Cabinet member with lead responsibility	Councillor Hazel Malcolm Public Health and Wellbeing	
Wards affected	All	
Accountable director	John Denley, Director of Public Health	
Originating service	Community Safety	
Accountable employee(s)	Karen Samuels Tel Email	Head of Community Safety 01902 551341 Karen.ssamuels@wolverhampton.gov.uk
Report to be/has been considered by	People Leadership Team Strategic Executive Board	21 May 2018 22 May 2018

Recommendation(s) for action or decision:

The scrutiny panel is recommended to:

1. Comment on progress to develop and implement proposals to tackle modern slavery in Wolverhampton

1.0 Purpose

- 1.1 To provide a progress update on steps to develop the Council and partnership response to modern slavery in Wolverhampton.

2.0 Background

- 2.1 The term modern slavery encompasses human trafficking, slavery, domestic servitude and forced or compulsory labour and is defined within the Modern Slavery Act 2015 which categorises these acts as offences. These crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.
- 2.2 Although human trafficking often involves an international cross-border element, it is also possible to be a victim of human trafficking within a country; if a person is moved from one part of the country to another and to be a victim even if consent has been given to be moved.
- 2.3 There are several broad categories of exploitation linked to human trafficking, including:
- Sexual exploitation
 - Forced labour
 - Domestic servitude
 - Organ harvesting
 - Child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc
 - Forced marriage and illegal adoption (if other constituent elements are present)
- 2.4 The National Referral Mechanism is a framework for signposting victims of human trafficking or modern slavery and ensuring they receive the appropriate protection and support and is the method through which victims are referred/reported for support. The Act places a requirement on Local Authorities to identify potential victims of modern slavery and report identified cases to fulfil its 'duty to notify' requirements.
- 2.5 Whilst current legislation does not outline a requirement for partnership working, the West Midlands Metropolitan area does benefit from some degree of strategic coordination through a West Midlands Modern Slavery and Human Trafficking Board.
- 2.6 Each of the seven local authority areas are developing local partnerships to drive delivery. At a local authority level, governance is provided through Safer Wolverhampton Partnership with strong links to Adults and Children's Safeguarding Boards.
- 2.7 City wide coordinated delivery is currently driven by Wolverhampton Anti-Slavery Partnership, a multi-agency forum with representation across statutory, voluntary and faith sector.

- 2.8 The hidden nature of modern slavery, the inability of some victims to recognise their own victimisation and the changing operations of organised crime groups means the prevalence of modern slavery is not known. There were 11 cases of modern slavery (minors) submitted to the National Referral Mechanism from Wolverhampton from Jan – Dec 2017 compared to six cases the previous year; all were minors. These cases related to county lines/drugs and child sexual exploitation. West Midlands Police are working through a backlog of referrals received from the National Crime Agency, so available data provides an indicative rather than a definitive picture.
- 2.9 The CWC introduced a byelaw in December 2017 under Sections 18 and 20 of the Children and Young Persons Act 1933 introducing prohibitions on the employment of children. These measures support steps to safeguard children and young people from domestic servitude or forced labour.
- 2.10 A report presented to Adults and Safer City Scrutiny Panel on 19 September 2017 outlined both the partnership and CWC proposals for tackling modern slavery in the city. A brief update against the key themes of delivery is provided below:

3.0 Summary of Progress – Partnership Delivery Plan

Area of Focus (Identified Sept 2017)	Progress Update
Raise awareness through development of Communications Plan	<ul style="list-style-type: none"> • Communications plan in place and in process of refresh to factor in training offer • Aide Memoir in development covering indicators of modern slavery, care pathway, intelligence submissions and key contacts • Communications plan to align with CWC/Police communications teams
Development of comprehensive training package for roll out	<ul style="list-style-type: none"> • A national training package has been launched (tier1 - 4) • Train the trainer session scheduled 4/5 June. Key services identified for roll out which is scheduled for summer 2018 • Integration into safeguarding boards training programme (Learning & Development Committee 25 July 2018)
Clarify and simplify the referral route and care pathway for victims	<ul style="list-style-type: none"> • Care pathway in development with CWC Head of Safeguarding (links to other safeguarding measures e.g CSE/county lines) • West Midlands minimum standards in development with local variation

	<ul style="list-style-type: none"> • Scoping work commenced on development of Black Country reception centre for potential victims
Clarify the support offer for victims	<ul style="list-style-type: none"> • Audit of partners undertaken to capture summary of provision • Links established to national sub-contracted provider (Black Country Women's Aid)
Strengthen data capture	<ul style="list-style-type: none"> • Police developed and promoted use of intelligence log for data capture.
Develop arrangements to identify, disrupt and dismantle organised crime groups (OCGs) linked to modern slavery	<ul style="list-style-type: none"> • Black Country organised crime forum established – meets bi-monthly to identify organised crime groups and coordinate tactics
Strengthen links to the business community to address labour exploitation	<ul style="list-style-type: none"> • Discussion scheduled with Wolverhampton Business Crime Reduction Forum Sept 2018 once training, communication materials are in place. Wider dissemination to be agreed

4.0 Strengthening City of Wolverhampton Council's Approach.

4.1 The Modern Slavery Act 2015, outlined a number of responsibilities for local authorities in relation to modern slavery.

4.2 The CWC has also committed to developing a modern slavery improvement plan to strengthen the corporate response. Meetings are being held with key service leads to agree actions for finalisation of Council plan. Discussions have been held so far with Safeguarding, Procurement, People's lead (covering Adults and Children's Services), Workforce Development. Proposed implementation includes:

- Leading development of a modern slavery multi-agency pledge against slavery to raise awareness and commitment
- Identifying contracts posing a higher risk of modern slavery being perpetrated. Scope auditing options for these contracts
- Applying minimum standards within CWC contracts (to include sub contracts)
- Strengthen due diligence checks on contracts prior to award
- Tiered training offer to be rolled out summer 2018 to frontline staff and councillors to include refresh of e-learning, designated teams' completion of training (tiers 3 and 4), update of Councillors' induction information; offer of daytime and evening briefings for Councillors;

- Corporate communications to accompany training roll out and care pathway development
- Development of modern slavery briefings for Managers' to roll out within teams.

4.3 CWC service leads are being invited to contribute to the plan, which is due to be finalised at the end of June 2018.

4.4 Local Government Association Guidance produced and launched in Feb 2018 provides a helpful summary of the implications of modern slavery for Councils, with practical suggestions as to areas for strengthening practise. A link to the guidance can be found here. <http://www.saferwolverhampton.org.uk/documents/Modern-slavery-Guidance.pdf>

5.0 Ongoing Operational Delivery - Examples

- Police and Immigration Enforcement-led operations have been conducted with support from partners, focused upon Car Washes and nail bars.
- A steering group formed of Police, Community Safety, Planning and Private Sector Housing teams are working to identify and map the Houses of Multiple Occupation within the city. Alongside this, multi-agency housing visits have been carried out across the city.
- Since November 2017, there have been 19 crimes reported within Wolverhampton related to Modern Slavery, and 25 intelligence submissions. In addition, in Quarter 3 of the 2017-2018, four referrals were made by the CWC to the National Referral Mechanism, all four being referred in via the Multi-Agency Safeguarding Hub.

6.0 Next Steps

Key Area of Delivery	Timescale
Train the Trainers delivered	4/5 June 2018
Completion of CWC Modern Slavery Plan	End June 2018
Care pathway revised	July 2018
Communications Plan finalised	July 2018
Roll out of national training programme	August 2018 onwards

7.0 Issues for Scrutiny Consideration

- 7.1 There is no additional resource for delivery of the modern slavery approaches outlined within this report; the focus is therefore primarily on improving mainstream practice and coordination of voluntary, community and faith sector support.
- 7.2 Scrutiny Panel is asked to consider whether any further proportionate steps could be progressed to raise awareness and aid delivery of the CWC and partnership modern slavery approaches.

8.0 Financial implications

- 8.1 There are no financial implications relating to this report. Any costs arising from actions detailed in this report will be met from existing budgets.
[SB/18052018/X]

9.0 Legal implications

- 9.1 The stated actions will ensure the Council complies with its obligations in accordance with the Modern Slavery Act 2015. The proposals outlined within this report are in support of the byelaw introduced under Sections 18 (2) and 20 (2) of the Children and Young Persons Act 1933 introducing prohibitions on the employment of children.
[RB/15052018/I]

10.0 Equalities implications

- 10.1 Proposals contained within this report will strengthen both the Council and City response to modern slavery and support some of the most vulnerable and marginalised individuals who have been subjected to modern slavery or human trafficking. As the nature of this abuse is largely hidden, the protected characteristics of victim profiles are not yet fully understood.
- 10.2 An initial equalities screening has been undertaken; it is recognised that nationally, victims from Albania, Vietnam and UK are the most commonly reported potential victims; 59 % of victims were females with the peak age of victims aged between 15-24 years. Delivery and targeting of communications and engagement is therefore tailored to reflect varying need and the communications and training offer are kept under regular review to reflect the changing victim profile.

11.0 Environmental implications

- 11.1 There are no environmental implications.

12.0 Human resources implications

- 12.1 There are no human resources implications.

13.0 Corporate landlord implications

- 13.1 There are no Corporate Landlord implications.

14.0 Schedule of background papers

- 14.1 Adults and Safer City Scrutiny Panel – Wolverhampton’s Approach to Tackling Modern Slavery 19 September 2017.
- 14.2 Local Government Association. Modern Slavery: A Council Guide
<http://www.saferwolverhampton.org.uk/documents/Modern-slavery-Guidance.pdf>