

BEV HUGHES

**DEPUTY
MAYOR OF
GREATER
MANCHESTER**

Rt Hon Amber Rudd MP,
Home Secretary
2 Marsham Street
London
SW1P 4DF

18th December, 2017

SUBJECT: HMICFRS Inspection Report - Stolen freedom: the policing response to modern slavery and human trafficking

Dear Amber

I write in response to the above report that was published in October. I am pleased to see an inspection providing a focus on the issue of modern slavery and human trafficking.

In 2012, only two crimes of modern slavery were recorded by the police in Greater Manchester. It was a little understood crime and reporting was very low. However, there were individuals and organisations campaigning hard to raise awareness that under the surface of our society, modern slavery was in fact taking place at a much more alarming rate than was first realised.

In Greater Manchester, Programme Challenger was set up in 2012 as a multi-agency response to tackling serious and organised crime. In March 2015 a specialist Modern Slavery Coordination Unit was established under this multi-agency structure bringing together a range of key partners working together to share information and intelligence, as well as putting in place joint strategies to keep victims safe and bring offenders to justice.

I am pleased to see the acknowledgement of this work within the inspection report with Greater Manchester Police (GMP) cited as 'leading the way' in the law enforcement response to modern slavery and human trafficking.

The report did highlight some concerns and raise several recommendations for all forces and I would like to respond to these from a Greater Manchester perspective.

In relation to leadership and governance, there was a recommendation to review current processes and ensure adequate resources and partnership arrangements were in place to investigate and co-ordinate activity effectively. The Modern Slavery Coordination Unit currently includes staff from the

police, local authority, immigration, probation, gang masters' labour abuse authority, Department of Work and Pensions, and a network coordinator from the charity STOP THE TRAFFIK. The Unit was the first of its kind in the country and I am pleased to see this work referenced within the Inspection report.

If someone is identified as being a potential victim of trafficking in Greater Manchester, there are structures in place to support them. GMP has 45 tactical advisors offering cover around the clock to provide advice to investigators at each incident. In addition, GMP also has over 100 Victim Liaison Officers who understand the complexity of modern slavery, know the referral pathways for support and are there to provide a single point of contact throughout the investigation.

Moving forward there is an intention to develop local leadership through new Vulnerability Leaders ensuring that Modern Slavery is built into the vulnerability plans and monitored effectively. The issue of modern slavery and human trafficking is subject to force governance, both at a senior level within the Serious Crime Department and also at force command level.

To enable the Modern Slavery Coordination Unit to operate effectively each partner within the unit requires access to data in a timely manner. This is currently managed under the Programme Challenger banner with information shared under the provisions of the Crime and Disorder Act. However, as the report suggests, we will consider whether this process is the most effective and appropriate.

The inspection findings included concerns regarding compliance with the National Crime Recording Standard (NCRS). The Greater Manchester Modern Slavery Coordination Unit monitors every report and referral of potential modern slavery offences and conducts daily scanning to capture all related crimes. This includes referrals from the third sector, the National Referral Mechanism, Local Authorities and other partners. This activity is recorded to ensure that all respective crime reports are recorded in line with NCRS principles and Home Office Counting Rules. The Force registrar retains overall responsibility for accurate crime recording and oversees a risk based audit process which is governed by the Force Crime Standards Board. I will retain close contact with this work to ensure GMP remain compliant with recording standards and with National Referral Mechanism, now and as it evolves in the future.

The inspection also emphasized the importance of utilizing preventative powers to restrict the activities of those deemed to pose a clear threat to others in respect of modern slavery and human trafficking. The use of these powers in disrupting the activities of those people who pose a risk to others, is key. In addition to the existing use of Prevention orders, I am supportive of GMP's approach to identify opportunities to issue Risk Orders for cases where the criminal investigation is not pursued. It is the intention that this process will be managed locally through the Vulnerability Leaders to ensure such opportunities are thoroughly assessed.

With regard to the management of investigations, I am confident that these are conducted effectively and to a high quality. However, I am aware that the success rate for prosecutions and convictions remains low, for a variety of reasons. I want to work with the police service to look at how data from multiple partners can be overlaid to identify opportunities for victimless prosecutions and how we can best utilize legislative powers that are available.

Throughout the investigative process, it is important to remain focused on the needs of the victims, most of whom are forced or coerced to carry out criminal acts under compulsion and should be protected. I want to see police officers utilizing the Section 45 defence powers, under the Modern Slavery Act 2015, to support those victims that have been coerced into criminal behavior. Details of applying the Section 45 defence form a key component of the training provided to the tactical advisors. It is also included as part of the new investigators course and will feature in future training for new detectives. In addition, there are close links with the Crown Prosecution Service to identify and refer any cases where the potential for this defence may not have been explored fully.

To help further support victims of these crimes, I have provided funding for an emergency accommodation project, so that on identification, any potential modern slavery victim, regardless of

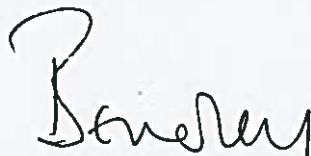
their immigration status, would have a short term place of safety to stay - a place to sleep, shower, eat and receive support on what options are ahead of them.

I want to assure you that this is a priority for Greater Manchester, for me and for the Chief Constable and we will continue to work closely to ensure victims are identified and receive the required response.

Traffickers will only be stopped by strong partnerships where professionals and communities talk to each other, pass on information and work together to protect vulnerable people.

The work to date of Programme Challenger and the Modern Slavery Coordination Unit has been instrumental in developing and maintaining these strong partnerships across all sectors, including with voluntary and community groups and we need to continue to build on these foundations to further strengthen our understanding and response to these heinous crimes.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Beverley', written in a cursive style.

Rt Hon Baroness Beverley Hughes
Deputy Mayor of Greater Manchester
Police, Crime and Criminal Justice

