

# Ending Modern Slavery:

Our Strategy for a  
Coordinated Community  
Response 2021-2026



City of Westminster



THE ROYAL BOROUGH OF  
KENSINGTON  
AND CHELSEA

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## Need support?

**In an emergency, always call 999. If you come across anything suspicious or need support, contact the Modern Slavery & Exploitation Helpline, 08000 121 700 (open 24/7)**

**For local services, visit [www.angelou.org/human-trafficking](http://www.angelou.org/human-trafficking)**

## Short on time? Find out which parts are most relevant for you!

 <b>Individual?</b> Resident Visitor General public	 <b>Community?</b> Faith Groups Community and voluntary organisations Education	 <b>Professional?</b> Business Law enforcement Healthcare Local authority Charities	 <b>Society?</b> Local, national and international law and policy makers
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# 1. Introduction

**Modern slavery is not inevitable. It is not a phenomenon removed from our everyday lives. It is happening here, within the boroughs of Kensington and Chelsea and Westminster, tainting the items we buy and impacting our communities and the people in them. No one agency can end modern slavery alone. Every organisation and individual must take responsibility for their part.**

This is why this strategy has been co-produced by partners, including by survivors and residents. When this document speaks of ‘we’ or ‘our’, it is referring to all partners, present and future, who wish to be involved in this response.

The strategy sets out our vision for ending modern slavery and how we can all work together to achieve this.

# 2. What is Modern Slavery?

## 2.1 Definitions

Modern slavery is complex; but simply put, it describes a situation where someone is made to do something and another person gains from this.

It is **deception or coercion** → **for the purpose of exploitation**.

deception or coercion	for the purpose of exploitation
Deception or coercion may include threats, force, debt bondage and abuse of power or vulnerability.	The purpose of exploitation may include the following: <ul style="list-style-type: none"><li>• forced labour – being made to work for little or no money</li><li>• sexual exploitation – being coerced or forced into selling sex</li><li>• domestic servitude – being made to work within a home environment for little or no pay</li><li>• criminal exploitation – being forced to break the law for someone else (i.e. stealing, selling drugs)</li><li>• forced/sham marriage – being made to marry someone you don't want to marry</li><li>• organ harvesting – bodily organs being removed for financial gain</li></ul>
For anyone under the age of 18, the abuse of vulnerability is automatically present.	

Modern slavery can affect anybody of any age, gender or ethnicity. It is often hidden in plain sight, making it hard to recognise victims/survivors. People are often unable to escape because of fear for their own lives or for the lives of their family, or because they don't know who to turn to or who to trust.

## 2.2 What are the causes of modern slavery?

### Example

Peter is told by a recruitment agency that he's going to be working 40 hours a week at a factory and paid minimum wage. If this turns out not to be true, **Peter has been deceived**. It might be hard for Peter to leave this situation as his family might be threatened or he may be told to pay off his recruitment fees first...

...Peter works 7 days a week at the factory. He works long hours without a break. The money he earns goes into the agency's bank account and he is only given money to buy cigarettes. He is being exploited in **forced labour** and doesn't see a way out.

Modern slavery is caused by someone taking control of another person. Poverty, abuse and conflict can make people more vulnerable to being controlled as these factors may lead to precarious journeys, seeking asylum, homelessness, substance misuse, domestic abuse and mental ill health. Exploiters take advantage of these vulnerabilities, often offering victims a way out of their situation that's too hard to refuse.

## 2.3 Context of modern slavery

Modern slavery may cross over with other forms of abuse such as child abuse and Violence against Women and Girls. Bearing this in mind may be useful when thinking about the support options available for survivors – especially ensuring the safeguarding of children – and when considering laws that could be used to bring exploiters to justice. It can also be useful when thinking about power dynamics between exploiters and victims/survivors and ensuring this is not replicated by different agencies who are trying to help.

When working with survivors of any form of abuse, it's important to keep in mind the whole picture and recognise that minoritised groups may face additional barriers. For example, someone's race, class, gender, disability or sexuality can make it harder to leave a situation of exploitation due to fear of stigma and the response they may receive. Seeing someone as a whole person and responding to their diverse needs is called Intersectionality<sup>1</sup>. Responses should be tailored to an individual's needs as a whole person, rather than solely as a victim/survivor of exploitation.

Anyone can be an exploiter, and in most cases, money greed and power are the drivers. However, there are also cases where people become exploiters to avoid - or because they are - being exploited themselves. Exploiters may act alone or be part of an organised crime gang. Businesses can also exploit individuals too.

### Is modern slavery *modern*?

Slavery has existed for thousands of years. The transatlantic slave trade resulted in the transportation and exploitation of millions of Black people between the 15th and 19th centuries. Slavery was legal at the time which meant that exploiters had the law on their side. Its impact continues today, through racism, discrimination and the development of countries affected by the trade.<sup>2</sup>

What we refer to as *modern* slavery is illegal and is therefore less visible. Exploiters prey on vulnerability rather than ethnicity and can be prosecuted for their actions.

We can educate about slavery in the past whilst raising awareness that slavery persists today. But we should also recognise the categories in their own right and the ongoing damage and impact caused.<sup>3</sup>

<sup>1</sup> Kimberlé Crenshaw, 1989

<sup>2</sup> Anti-Slavery International, *Slavery Past and Present*, 2017

<sup>3</sup> Dr. Eefje de Volder, IMPACT

## 2.4 Common myths about modern slavery:

**MYTH:** People must be locked in or tied up to be victims of modern slavery

**TRUTH:** In most cases, people aren't locked up or tied up. They may be free to walk around outside or carry a mobile phone. This is what we mean by 'hidden in plain sight'. A victim of modern slavery may be cooking your food in a restaurant or fixing the roof of your house.

It's the threats to themselves or their family, deception, violence, coercion and believing they have debt to pay off that keeps people trapped in modern slavery, not physical chains.

**MYTH:** It's only modern slavery if the person doesn't get paid

**TRUTH:** Modern slavery can include people on no pay but also extremely low pay. Often the money that people are paid will go towards their transportation and recruitment costs, which is known as debt bondage. People should not be made to work in conditions that deny their basic human rights (such as working extremely long hours, being made to sleep where they work and denied food etc.).

**MYTH:** Victims of modern slavery are from countries outside the UK

**TRUTH:** Modern slavery affects every nationality. UK nationals are the most reported as victims to the National Referral Mechanism, followed by Albanian and Vietnamese nationals.

**MYTH:** All victims of modern slavery are women and all exploiters are men

**TRUTH:** People of all genders can be victims of all forms of modern slavery. This includes men being victims of sexual exploitation and women being victims of forced labour. Similarly, people of all genders can exploit others.

**MYTH:** If I asked someone if they were a victim of modern slavery, they would tell me

**TRUTH:** There are many barriers that might stop someone asking for help or when asked, they might say that they're fine.

These barriers include: not being able to speak the language; not being aware support is available; not recognising themselves as victims; fear for their lives or the lives of family members; fear of being removed from the country; manipulation of someone's faith or belief, for example using witchcraft; misplaced loyalty to the exploiter and fear of organisations such as the police.

Additionally, vulnerability factors such as learning needs, mental ill health, addiction or age may mean that people have a limited ability to make consensual choices around their working arrangements.

Read the section on 'Questions you could ask' and 'Victims Supported' to see how taking the time to build trust and ask the right trauma-informed questions can lead to better support for survivors.

# 3. The Local Picture

**STOP THE TRAFFIK**, a specialist anti-trafficking charity working locally, collects anonymous modern slavery data from local partners. By collating and analysing this information we can increase our understanding of exploitation in Kensington and Chelsea and Westminster.

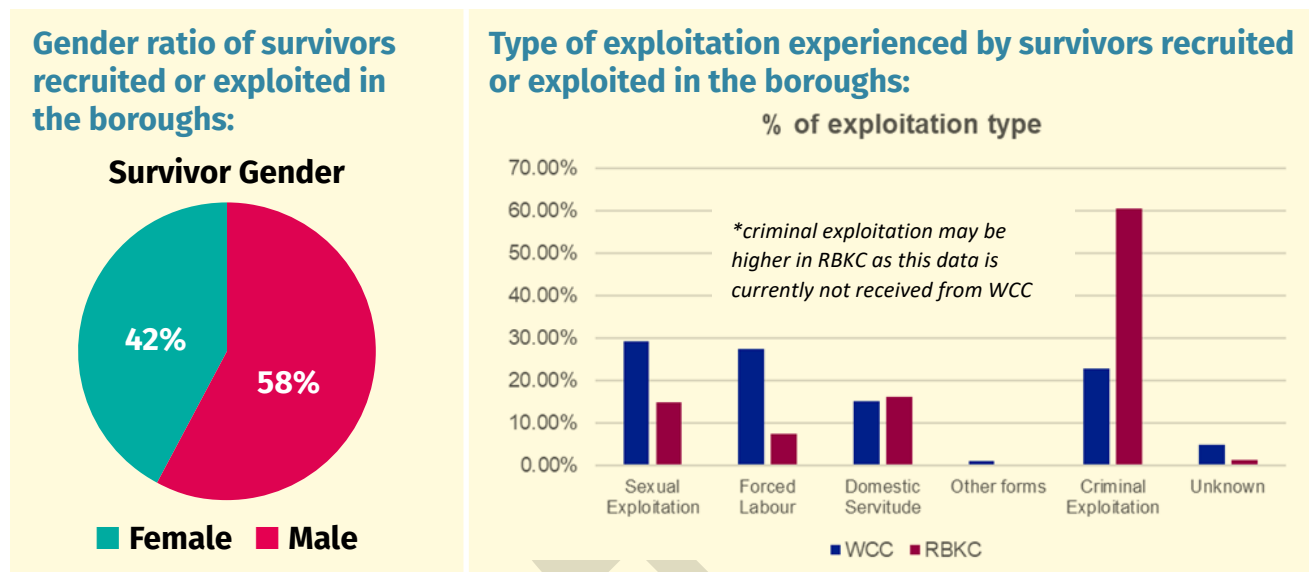
The following statistics provide a snapshot of modern slavery in the boroughs. They only account for the cases known to the partners who share data and therefore the actual numbers of cases are anticipated to

be much higher. If you have information you can share to build the picture of modern slavery in the boroughs, please contact [info@stopthetraffik.org](mailto:info@stopthetraffik.org).

**500** survivors were present in anonymous data shared by local partners over an eight month period between April 2019 - November 2020.

Of these 500, **204** people were known to be recruited or exploited in the boroughs.

The remaining **296** survivors were either identified or supported by services in the boroughs.



**British, Chinese, Filipino and Romanian** were the most common nationalities of survivors recruited or exploited in the boroughs.

Westminster	Kensington and Chelsea
Chinese	British
Romanian	Filipino
Thai	Albanian
British	Moroccan

**Face-to-face false job promises** was the top recruitment method used.

**Excessive working hours, false job promises, and restriction of movement** were the top control methods used.

**54** referrals were made to the National Referral Mechanism by the two councils Jan 2019- Sep 20. Additional referrals to the NRM were made by the police and other First Responder organisations in the boroughs during this time. Adult victims must give informed consent to enter the NRM, and where that was not provided, alternative options for support were explored.

	2019 Jan - Dec			2020 Jan - Sep			
	Total Adults	Total Children	Age not recorded	Total Adults	Total Children	Age not recorded	Duty to Notify
<b>RBKC</b>	1	7	0	3	8	0	2
<b>WCC</b>	5	7	1	3	14	2	1

## 4. Our Approach

### 4.1 The Coordinated Community Response

Kensington and Chelsea and Westminster take a Coordinated Community Response (CCR) to ending modern slavery, which asks everyone to play their part. It requires us not only to respond appropriately within our own agencies, but also to work together with other organisations.

During a survivor's journey, the chances are they will encounter dozens of different agencies. Each one holds a piece of the puzzle and by responding appropriately and working together we can ensure the survivor doesn't fall through the gaps. This is the CCR.

This CCR strategy sets out a shared understanding of how we plan to tackle modern slavery over the next five years and reach our overall vision of ending modern slavery in the boroughs.



**Figure 1** - example showing some of the different agencies which can work together to provide support

### 4.2 The Ecological model

For the CCR to be successful, everyone needs to work together at an individual, community, professional and societal level. This is called the ecological model<sup>4</sup> and the diagram shows how these levels are connected and dependent on each other.

The societal level includes the wider regional, national and international response; both to modern slavery itself and the laws, legislation and policies which play a part in increasing vulnerability and risk. Whilst this strategy is designed for Kensington and Chelsea and Westminster, we are aware of the influence society has on us and the influence we may be able to have on it.

For the *Our Objectives* section below, we've included an ecological model for each objective to show the actions individuals, communities, professionals and society can take to help reach the shared goal.



**Figure 2** - The Ecological model

<sup>4</sup> Heise et al, 1999; Krug et al., 2002; CDC, 2004  
<https://www.cdc.gov/violenceprevention/publichealthissue/social-ecologicalmodel.html>

<https://www.endvawnow.org/en/articles/1509-the-ecological-framework.html>  
[https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7357858/#\\$1title](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7357858/#$1title)



## Best Practice – CCR Example 1

**The London Ambulance Service (LAS) was called to an address to respond to Anita, who was seriously ill. They became concerned about modern slavery as there were locks on the outside of the bedroom doors and a man who was present was acting aggressively. The LAS contacted the police and also flagged concern to the hospital staff.**

When Anita was stable and able to speak, the hospital social worker visited her with a qualified interpreter and a colleague from the hospital's discharge team. Anita was fearful and would not open up to them or the police.

During this time, the hospital social worker attended modern slavery training and learnt about the National Referral Mechanism (NRM) and barriers to disclosure. She visited Anita on several occasions with the same interpreter, building her trust until Anita felt comfortable sharing her experiences of sexual exploitation.

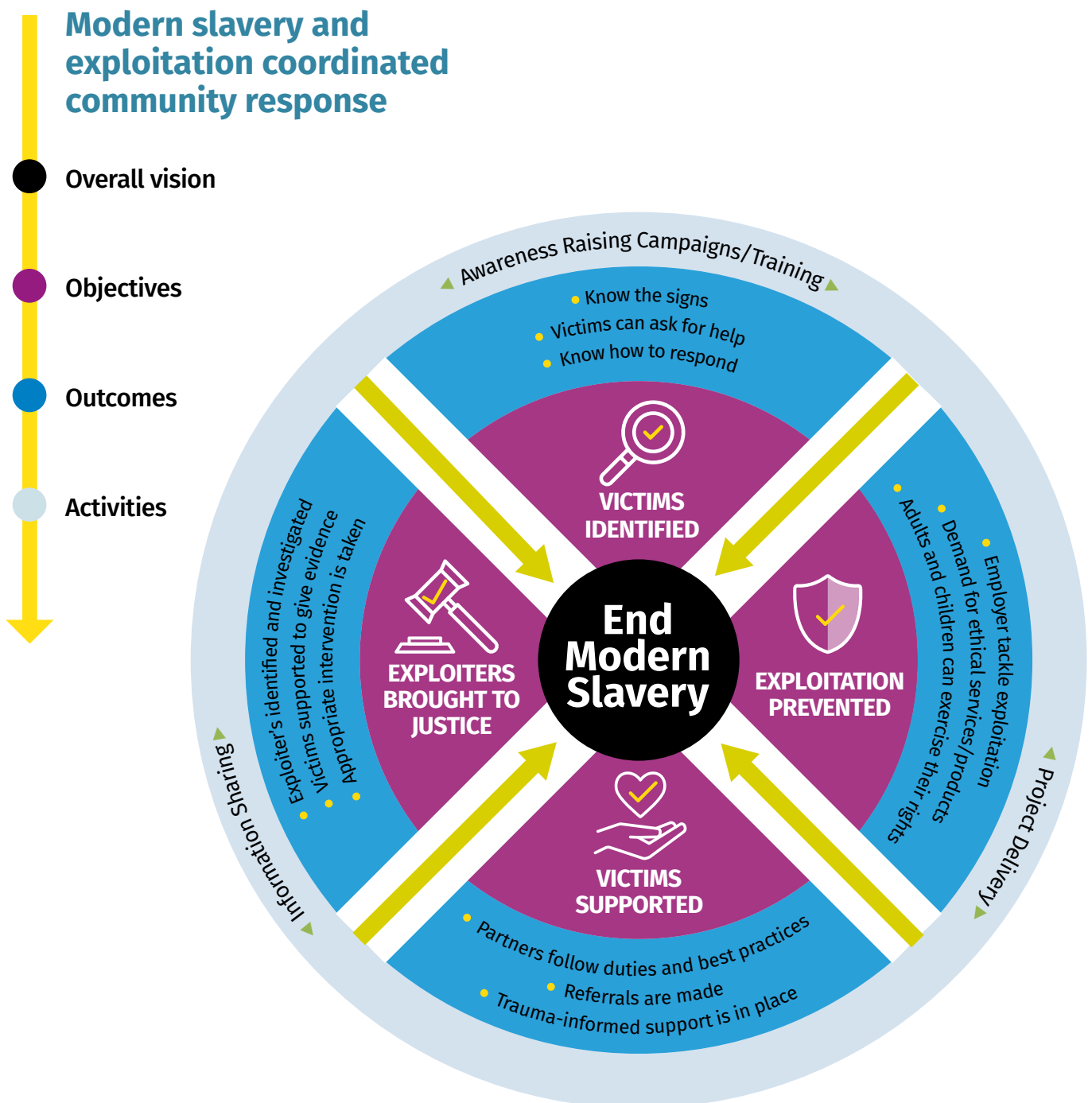
Initially Anita did not consent to enter the NRM and the hospital social worker was concerned she would be discharged without support and return to her situation

of exploitation. With Anita's permission, the social worker contacted a specialist charity, Tamar, with a member of staff who spoke the same language. They visited Anita in the hospital to build rapport and offer support. They also visited her when she was moved to a different hospital. With this consistency and a clear explanation of what the NRM entails, Anita gave her consent and an NRM referral was made by the social worker.

When Anita was discharged from hospital, she was supported through the NRM victim care contract and Tamar continued to provide additional support. With time Anita felt confident in speaking to the police who are currently investigating the case. Anita also participated in the survivor consultation to help shape this strategy and continue to strengthen our Coordinated Community Response to modern slavery.

# 5. Our Objectives

Our vision is to end modern slavery in Kensington and Chelsea and Westminster. This would enable all residents and visitors to live and work safely and ensure our actions as businesses and consumers don't negatively impact individuals and communities elsewhere. The **theory of change** diagram below outlines the four objectives we need to meet to reach this vision. These objectives are each discussed in turn.





## 5.1 Objective 1: Victims Identified

Identifying people as victims/survivors of modern slavery is important in making sure they can access appropriate support. Often people – especially children – don't recognise themselves as having been exploited or are too fearful to come forward and ask for help; so, it's important we can all spot the signs and know what to do.

When discussing how we can make sure victims are identified, survivors recommended increasing awareness of modern slavery in the community and with organisations they could have come into contact with. They also said how important it was that kind strangers had approached them to express care.

Importantly, survivors emphasised the need to be patient and gain trust, allowing time

for them to open up or make decisions about the future.

By prioritising Victims Identified, we are asking everyone to know the signs of modern slavery and know how to respond. We are also working towards removing barriers so that victims/survivors know where to go to ask for help and feel able to do so.

What does 'Victims Identified' look like?	What difference will it make?
Know the signs: Everyone knows that modern slavery is happening here and knows the signs to look out for.	It will be harder for exploiters to operate undetected in our neighbourhoods.
Victims can ask for help: The barriers stopping victims coming forward and seeking support are removed. Victims know their rights and the support available for them and feel able to ask for help.	More survivors will come forward and feel confident disclosing their situation knowing that there is support available to them.
Know how to respond: Everyone knows what to do if they suspect modern slavery.	More survivors can access support and more exploiters can be brought to justice. This will make our communities high-risk and low-profit for exploiters.

“We need to challenge the media's representations of modern slavery, so victims/public are better able to recognise it.”  
**Local Voluntary Organisation**

“I caught a shoplifter with her hand in my customer's handbag. Then I saw two huge men glaring at her once she was caught and I saw the fear in her eyes. I then knew she was a victim and my thoughts turned from anger.”  
**Local Business Owner**



## 5.1 Objective 1: Victims Identified

### How can we all play our part in the CCR?



**Individual:**  
Victims/survivors are supported to overcome barriers and know the support that is available for them.

- Learn the signs of modern slavery
- Call 999 in an emergency
- Call the Modern Slavery & Exploitation Helpline for advice and support or to report suspicions 08000 121 700



**Community:**  
Modern slavery is everyone's business and all members of the community know the signs and how to report suspicions.

- Learn the signs of modern slavery
- Call 999 in an emergency
- Flag suspicions with the Modern Slavery & Exploitation Helpline 08000 121 700
- Read the section on Questions you could ask



**Professional:**  
Time is taken to build trust with survivors and agencies are aware of how they should respond to potential cases of modern slavery.

- In addition to the Community recommendations:
- Arrange modern slavery awareness training
- Develop your organisation's response should victims/survivors be identified



**Society:**  
Narrative around modern slavery is evidence-based, survivor-centred and avoids victim-blaming or inflammatory language and images.

- Use our approved terminology guide on page 15
- Use images which help the audience to recognise modern slavery is hidden in plain site and the ways in which victims/survivors are controlled and unable to escape



## 5.1 Objective 1: Victims Identified

### Best Practice – CCR Example 2

**Archie was 16 years of age when he was arrested in a Home County for possession with intent to supply class A drugs. At the time of his arrest, he was in the company of a young adult, George, who had passed the drugs to Archie just moments before police arrived and arrested him.**

Archie was from West London, so the Youth Offending Service (YOS) met him some months later when he appeared at Court intending to plead guilty.

On reading the prosecution papers, the YOS spoke with Archie and his parents and it transpired that they were concerned that an adult (George) had regularly called at their address and that his calls coincided with Archie going missing for days at a time. The YOS also learned that Archie had an Education Health Care Plan for his learning needs and his parents were worried that he was being groomed by George who was aware of Archie's vulnerabilities.

George was already known to the YOS and to local police including for suspicion of him using children for dealing drugs. Archie was identified as victim of criminal

exploitation, an NRM referral was made and the matter was adjourned at court for the outcome of the referral to be known.

This took some time and the YOS kept in regular contact with Archie. It was during this time that Archie revealed that at the time of his arrest, the police in the Home County had allowed George's cousin to act as an appropriate adult and so Archie had not felt comfortable in police interview to talk about what had happened.

This case highlights the importance of sharing information between agencies, both local and national, in a timely manner and advocates taking the time to build rapport with victims/survivors and their family to give them opportunities to disclose.

“There were so many chances for people to intervene.”

**Survivor**

“Make that person trust you. Show them that you really want to help. Not just one time but come back and keep showing that they want to help.”

**Survivor**



## 5.2 Objective 2: Exploitation Prevented

Modern slavery thrives on vulnerability, money and power; and without preventative efforts it will persist.

We are all responsible for preventing exploitation. By buying items that may have been made by someone who wasn't paid or allowed a break, we contribute to the problem. As do businesses who don't investigate where the materials that make their products have come from.

When discussing preventing exploitation, a number of survivors shared how they had been looking for a way out of poverty when they were exploited and that they had no idea a person had the capacity to treat them the way their exploiters treated them. They discussed not having understood the

risks of modern slavery and said there were missed opportunities where people could have helped but didn't.

Survivors also shared that not having the legal right to work in the UK whilst waiting for decisions on their case can cause further exploitation as survivors feel forced to work illegally to have enough money to live. Exploiters take advantage of this by not paying the minimum wage and threatening to tell the immigration authorities if workers complain.

By investigating exploitation in businesses and empowering individuals to know and exercise their rights, we can prevent exploitation and demand that our boroughs are free from modern slavery.

“It needs to be seen as socially unacceptable to buy goods that might be tainted by exploitation.”

**Local Faith Leader**

“We need to focus on what makes people vulnerable and how can we remove these vulnerabilities.”

**Local Community Group Member**

### What does 'Exploitation Prevented' look like?

**Employers tackle exploitation:** Employers pay their staff at least the London Living Wage and provide fair and safe working conditions. Employers also require the same working conditions throughout their supply chain and proactively investigate this.

**Demand for ethical services/products:** Everyone considers where their products and services come from and demand they've been made free from exploitation.

**Adults and children can exercise their rights:** Everyone is treated equally with respect and dignity and are able to exercise their workers' rights and their human rights.

### What difference will it make?

Workers will not experience exploitative working conditions. Exploiters will find it harder to make money, with all sizes of businesses providing fair and safe working conditions and proactively ensuring this occurs.

Companies will meet the demand and work to ensure their goods and services are free from exploitation.

With everyone exercising Article 4 of the Universal Declaration of Human Rights, 'no one shall be held in slavery or servitude'.



## 5.2 Objective 2: Exploitation Prevented

### How can we all play our part in the CCR?



**Individual:**  
Individuals can exercise their rights and consider the journey of the things they buy

- Learn your workers' rights and your human rights
- Find organisations that can provide advice and support: <https://www.angelou.org/human-trafficking>
- Buy second-hand goods and ethically-sourced products where you can afford to



**Community:**  
There is increased demand for goods/ services which are free from exploitation

- Demand fair and safe working conditions for workers in services you commission (cleaning and building firms etc.)
- Report suspicions to the Modern Slavery & Exploitation Helpline 08000 121 700



**Professional:**  
Commercial and non-commercial organisations treat employees fairly and mitigate the risks of exploitation

- Ensure direct employees and third-party employees are paid at least the London Living Wage and have safe and fair working conditions
- Update procurement policies and require safe and fair working conditions throughout the supply chain
- Publish an annual modern slavery statement outlining this commitment



**Society:**  
People are considered equal and are given equal rights and opportunities. The root causes of modern slavery are addressed

- Provide asylum seekers and victims/ survivors of modern slavery with the right to work to reduce the risk of exploitative working conditions and the fear of reporting these, and enable survivors to contribute to the UK economy
- Promote a shift in acceptance towards people with diverse backgrounds and identities, including ethnicity, gender, disability, religion and sexuality



## 5.2 Objective 2: Exploitation Prevented

### Best Practice – CCR Example 3

**Ten agencies including police, councils, NHS healthcare trusts and charities across the boroughs regularly share anonymous data with STOP THE TRAFFIK to understand the local picture of modern slavery.**

Analysis of the data informs proactive preventative responses. For example, the data showed Filipino women being exploited in domestic work in the boroughs; working excessive hours without a break and not being paid the minimum wage. We delivered an online campaign to Filipino domestic workers to promote their rights, (such as the minimum wage and entitlements to breaks) and signpost to specialist support.

STOP THE TRAFFIK worked with experts in the field, including Kalayaan and the Voice of Domestic Workers, to design a short video in English and Tagalog. This was placed as a geo-targeted advert on Facebook, which meant it would appear on the Facebook feed of Filipino domestic workers in the boroughs. Pre and post campaign surveys were run to measure if there was an increase in awareness or action taken after seeing the video. Findings included:

- The campaign reached 48,434 in our target audience within the boroughs
- 4,814 (10%) clicked through to the website to learn more (double the 5% average)
- 90% of the post-campaign survey respondents said they found the campaign helpful
- 42% said they contacted an organisation for advice or support
- 37% added the phone numbers of support organisations to their phone, emphasising the preventative aspect to this campaign

By all agencies working together to build the intelligence picture we can take action to empower communities, enable survivors to access support, and prevent exploitation.



## 5.3 Objective 3: Victims Supported

Victims/survivors of modern slavery can have a range of needs; some of which will be because of the exploitation, but they may have other needs as well. Our approach needs to be holistic and led by both a person's immediate and long-term needs. It is vital that survivors are provided support that is trauma-informed to ensure the stability required for recovery.

Survivors shared that mental health support and therapy were vital in their recovery journey and that time-limits on support have damaging effects. Survivors also told us that having the right to work would have

a positive impact on their recovery journey, providing autonomy and purpose, enabling them to support their family and contribute to the economy.

Children may require additional support, especially in recognising that people they believed to be friends are exploiting them; and finding alternative routes to prevent further exploitation.

It is important that professionals and volunteers act without judgement or prejudice and are mindful of their own mental health and the effects of secondary trauma.

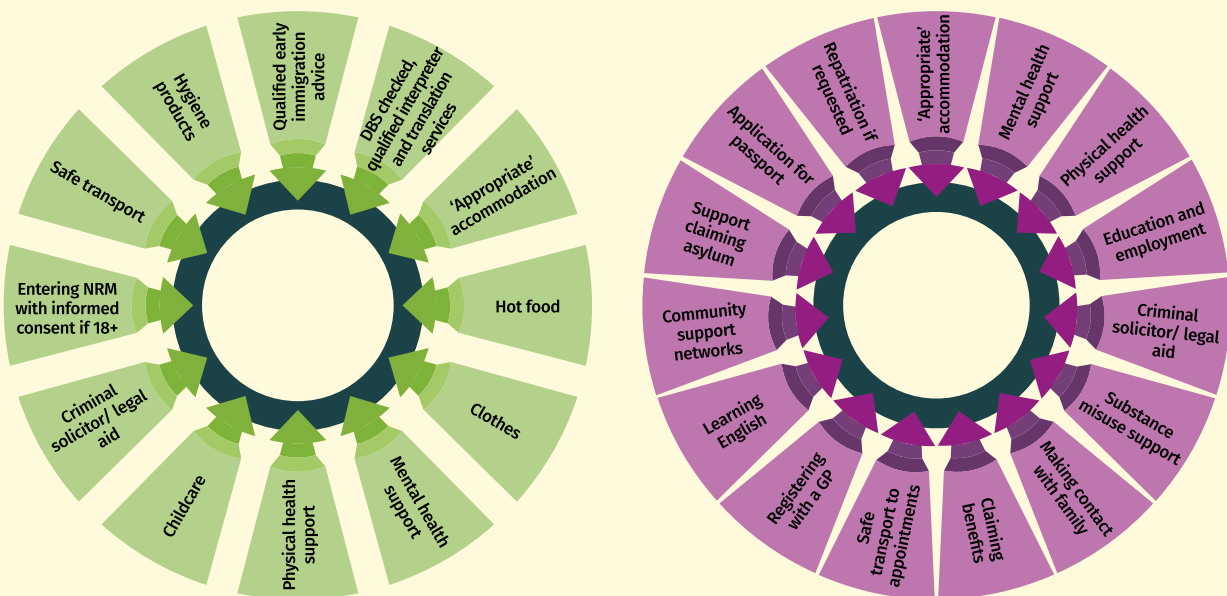




## 5.3 Objective 3: Victims Supported

What does 'Victims Supported' look like?	What difference will it make?
<p>Organisations follow duties and best practice: Agencies are aware of their duties in relation to modern slavery and respond appropriately, often going beyond the minimum requirement to give survivors the maximum support. Best practice examples are shared and adopted.</p>	<p>Survivors can access support from the very first time they come into contact with an agency.</p>
<p>Referrals are made: Appropriate referrals for each survivor are made in a timely manner. This may be to the National Referral Mechanism (with informed consent for adults) or to agencies able to provide tailored support to meet a survivor's needs.</p>	<p>Survivors will be able to access services they need without falling through the gaps. The risks of re-exploitation will be reduced.</p>
<p>Trauma-informed support is in place: All interactions with survivors are trauma-informed and holistic long-term support is available to meet varying needs.</p>	<p>Survivors will be supported throughout their recovery journey. It will be understood what it means to meet the diverse needs of victims/survivors.</p>

**Figure 2** - Whilst each survivor journey is unique, below are examples of the immediate and long-term support survivors told us they need:





## 5.3 Objective 3: Victims Supported

### How can we all play our part in the CCR?



**Individual:**  
Survivors can access long-term trauma-informed support

- If you see something suspicious, report it to the Modern Slavery & Exploitation Helpline on 08000 121 700



**Community:**  
Responses are trauma-informed and needs-led, providing indiscriminate support and timely referrals are made

- Ask sensitive questions (use the guide in this strategy on page 19)
- Address immediate needs
- Develop referral pathways and consider specialist organisations that can provide support: <https://www.angelou.org/human-trafficking>



**Professional:**  
Agencies work together to ensure survivors can access holistic wrap-around support that is trauma-informed

- Understand your duties in response to modern slavery
- Understand the National Referral Mechanism and your links with First Responders
- Familiarise yourself with the Trauma-informed Code of Conduct
- Address survivors' immediate needs and allow time to discuss long-term support
- Develop referral pathways and work together with other agencies



**Society:**  
Consistent trauma-informed long-term support is available for all survivors

- Ensure immigration status is not a barrier to accessing support and all survivors who are non-UK citizens have access to early qualified immigration advice



## 5.3 Objective 3: Victims Supported

### Best Practice – CCR Example 4

**Alex was in his mid-fifties when he arrived at The Passage Day Centre with post-traumatic stress disorder and physical scarring to his body. He was assessed by a nurse and mental health worker who were concerned about exploitation and alerted the Anti-Slavery Coordinator at The Passage.**

It transpired that Alex had been homeless since he was 18 and had been approached by a family while he was sleeping rough who offered him food, shelter and jobs in construction sites and farms. The family exploited Alex for decades until he suffered a serious injury which meant he couldn't work, and the family left him in a carpark.

The Passage arranged several nights in a B&B and provided him with food, toiletries and clothes. A Multi-Agency Case Conference (MACC) was held the following day with all frontline staff involved, including The Passage key worker, Anti-Slavery Coordinator, mental health worker, NHS nurse, Adult Social Care and Rough Sleeping Team manager.

At the MACC, the risks and Alex's needs were assessed, and all agencies played their part. Adult Social Care began a safeguarding referral, the Rough Sleeping Team supported with the NRM once Alex had given his informed consent, and The Passage facilitated primary needs including registration with a GP so he could start his medication. The B&B was booked until Alex was accompanied by The Passage to the NRM safe house to ensure continuity.

Several months later, in a follow up call, Alex informed The Passage that he was now living with his family and had secured a job through the local job centre. After months of stable medication and support, he seemed another man: calm, happy and hopeful.

“Good therapy. If you ask me therapy ten years ago, I would have looked at you and thought, do you think I'm crazy? It's the best thing because when I say it out loud, I am facing it. I am accepting what happened. When I say it out loud, I am helping myself to move on.”

**Survivor**



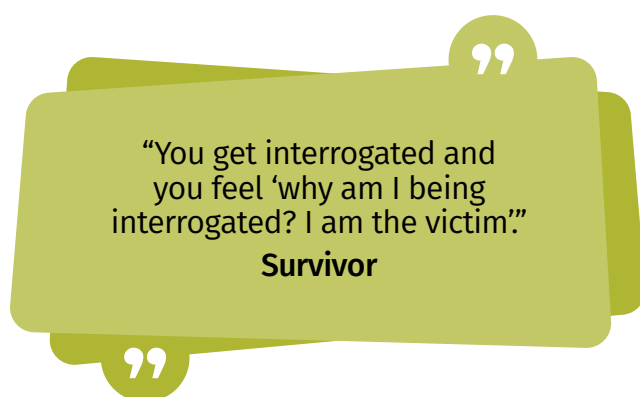
## 5.4 Objective 4: Exploiters Brought to Justice

Modern slavery is a crime and exploiters must be brought to justice to prevent them from exploiting others. It is not only police that are responsible for this objective. From the general public as members of a jury, to Environmental Health revoking licenses, we must work together to apply the CCR.

It is important that victims/survivors of modern slavery are first and foremost

treated as such, even when crimes have been committed. Survivors told us that criminal proceedings are only one aspect of justice. Justice would also mean that their stories of exploitation are believed, and they have time to heal. Survivors also highlighted that justice for them would mean justice for all victims/survivors.

What does 'Exploiters Brought to Justice' look like?	What difference will it make?
Exploiters identified and investigated: All agencies are involved in sharing information to build the intelligence picture and allegations are investigated thoroughly to ensure exploiters are held to account.	Survivors feel listened to and believed. Exploiters will not be able to operate undetected.
Victims supported to give evidence: Victims are supported throughout the criminal justice process and beyond, with their mental health at the forefront of considerations.	Survivors will be more likely to testify in court, leading to more convictions of exploiters. Exploiters will know that they will be held to account.
Appropriate intervention is taken: Survivor needs are put at the heart of any action and agencies collaborate to use the tools at their disposal to take a zero-tolerance approach to exploitation.	Survivors will feel safe and vindicated. Exploiters will be unable to exploit further victims.





## 5.4 Objective 4: Exploiters Brought to Justice

### How can we all play our part in the CCR?



**Individual:**  
Survivors are treated as the victim of crime and supported through any intervention

- In an emergency, call 999
- Put the needs of victims/survivors first. If you know someone who is an exploiter, report it anonymously to the Modern Slavery & Exploitation Helpline 0800 121 700 or Crimestoppers 08000 555 111



**Community:**  
Modern slavery is reported as a crime

- Share anonymous data to contribute to building the intelligence picture
- Take a 0 tolerance approach to modern slavery by responding to every concern and suspicion and reporting all forms of exploitation, even if the exploiter is known



**Professional:**  
Agencies work together to bring exploiters to justice

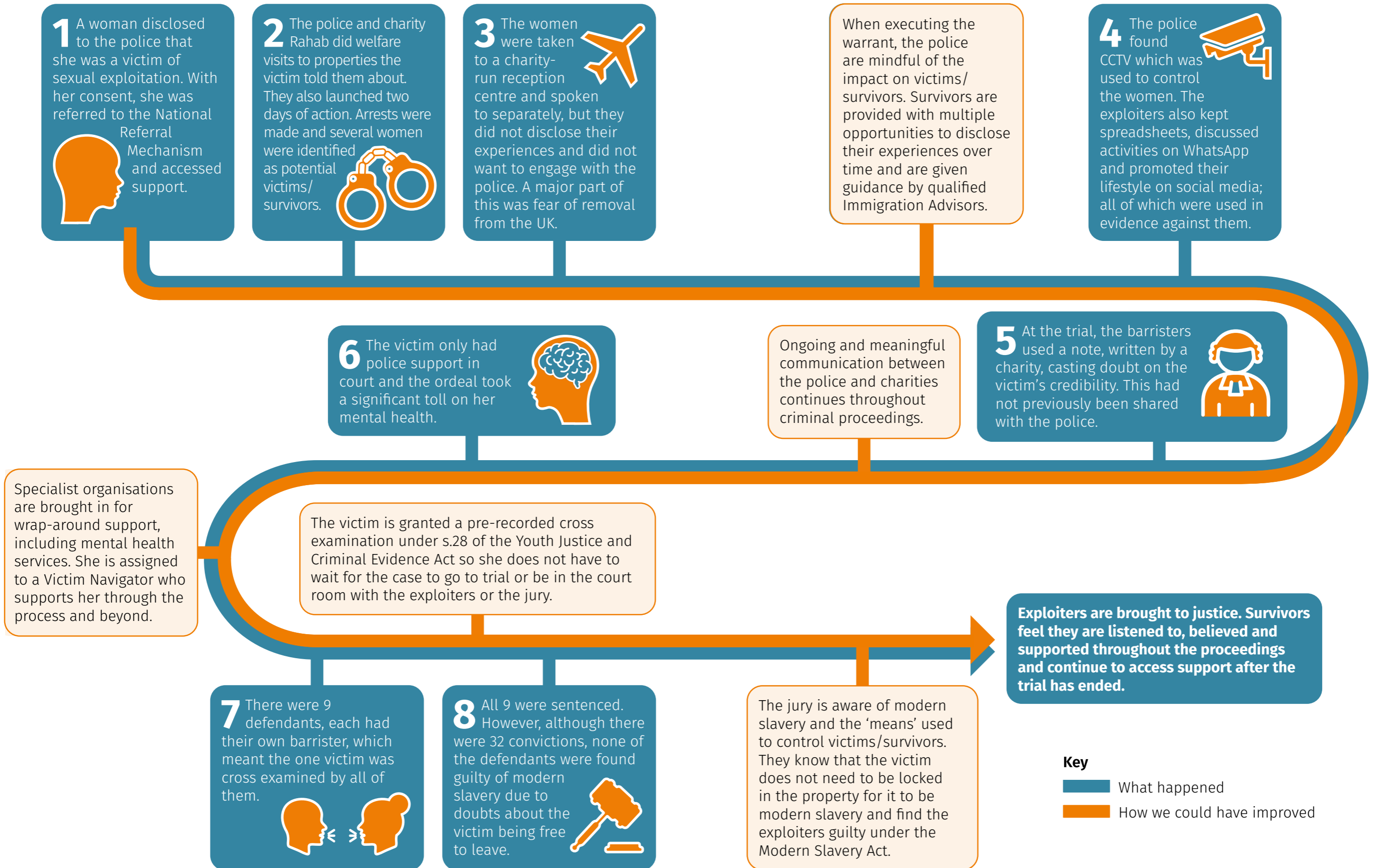
- Share anonymous data to contribute to building the intelligence picture
- Consider agencies with varying enforcement powers which you could work with to stage intervention
- Provide continued support for survivors throughout the intervention



**Society:**  
Exploiters are held to account and there is a 0 tolerance approach to modern slavery

- Businesses are held to account for exploitation in their business and supply chain
- Survivors receive compensation

# Operation Rumoi



## 6. Conclusion

**Modern slavery is not inevitable. We have the power to prevent exploitation, bring exploiters to justice and ensure victims/survivors are identified and can access meaningful support. Only by working together can this be achieved.**

Thank you to everyone who contributed to the creation of this strategy and thank you for taking the time to read it. This may be the conclusion but it's the beginning of the next five years and reaching our objectives. We look forward to working with you to deliver an approach which is collaborative, coordinated, trauma-

informed, Intersectional, gender-informed, and above all puts survivor voices and specialist services as its heart.

So, take another look at the diagrams on how we can all play our part and let's work together to end modern slavery.

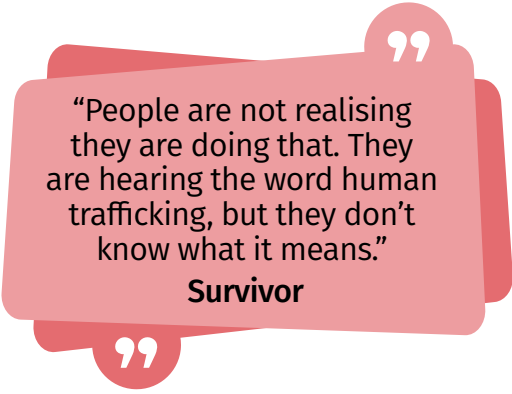
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## 7. Appendix 1: Approved Terminology

**The way in which we use language is important as it challenges stereotypes and avoids discrimination, whilst promoting dignity for survivors of modern slavery. Using the terminology recommended in this guide can support with building rapport with survivors.**

Please consider these three principles:

- Avoid language which places blame on a victim/survivor
- Avoid labels; consider saying 'people who are vulnerable to exploitation' as opposed to 'the vulnerable'
- Avoid terms that cannot be easily translated into another language, instead describe what the term means



“People are not realising they are doing that. They are hearing the word human trafficking, but they don't know what it means.”

**Survivor**

Approved Term:	Explanation:
Alpha Victim	'Alpha victim' is a term that is used to indicate where victims have been forced, groomed, or have progressed on to recruit and exploit others. Their conditions may improve despite remaining a victim themselves.
County Lines	One of the predominant forms of criminal exploitation we see in the boroughs is 'County Lines', which is a police term used to describe the exploitation of children or vulnerable adults to move and sell drugs. It is named after the phone lines often used in the distribution. Exploited individuals may have been groomed to believe they are autonomously selling drugs or that those exploiting them are their friends.
Cuckooing	Cuckooing is a form of crime, termed by the police, in which drug dealers take over the home of a vulnerable person in order to use it as a base for drug dealing. It is named after the cuckoo's practice of taking over other birds' nests.
Exploitation	Exploitation refers to someone else benefitting from the actions performed by an individual who is not appropriately rewarded and/or experiences a violation of their legal rights. Exploitation does not always amount to modern slavery, but modern slavery always involves exploitation.
Exploiter	<p>An exploiter benefits from the exploitation of another person. They may be controlling, coercive, threatening, violent or abusive. This can be psychological, physical, sexual, economical or emotional abuse.</p> <p>Exploiters can be any gender. An exploiter may pose as a friend or a lover, and therefore may not be recognised as an exploiter by victims.</p> <p>Perpetrator, exploiter, trafficker and offender are all approved terms when used correctly.</p>
First Responder	Only organisations that are considered First Responders can refer victims of modern slavery to the NRM. These First Responder organisations include local authorities, the police, Home Office, Border Force, Gangmasters and Labour Abuse Authority (GLAA), and specific charities. Note that the NHS is not a First Responder.



<p><b>Girls</b></p>	<p>Anyone under the age of 18 years of age is considered a child<sup>5</sup>. Women under the age of 18 may be referred to as girls.</p> <p>Referring to women over the age of 18 as girls is considered infantilising.</p> <p>Children under 18, exploited in prostitution, should be treated as victims of abuse. A child can never be a ‘child prostitute’.</p>
<p><b>Human Trafficking</b></p>	<p>Recruitment, movement or restriction of movement, by deception or coercion, for the purpose of exploitation.</p> <p>Anyone under the age of 18 does not need to be deceived or coerced for it to constitute trafficking.<sup>6</sup></p> <p>It is key to note that the exploitation does not need to take place to meet the definition of human trafficking; it is the intention to exploit that is important.</p> <p>Note that the term human trafficking does not translate into all languages so consider describing the situation instead.</p>
<p><b>Individual paying for sexual services</b></p>	<p>It is not an offence for person A to pay person B for sexual services provided by person B. As long as both are over the age of 18 and person B has not been coerced. It is an offence for a person in a street or public place to solicit another for the purpose of obtaining a sexual service.</p> <p>Avoid the terms:</p> <ul style="list-style-type: none"> <li>• Client/ customer as these can be confused with terms used by charities to describe the individuals they support.</li> <li>• John / punter as these can minimise the role of individuals paying for sexual services.</li> </ul>
<p><b>Informed Consent</b></p>	<p>Informed consent is vital in all aspects of survivor referral and support. Informed consent equips an individual with the knowledge and context to make their own decisions. Adults must provide informed consent to enter the NRM, no matter how long it takes for a survivor to make the decision. Without informed consent, survivors can experience re-trauma as situations can emulate a situation of exploitation where there was no control.</p>
<p><b>Intervention</b></p>	<p>Avoid the term ‘rescue’ as it denotes a lack of agency for victims/survivors and assumes they need to be saved.</p>

<sup>5</sup> Protocol to Prevent, Suppress and Punish Trafficking in Persons, UN Convention against Transnational Organized Crime, 2000

<sup>6</sup> Protocol to Prevent, Suppress and Punish Trafficking in Persons, UN Convention against Transnational Organized Crime, 2000

<p><b>Modern Slavery</b></p>	<p>Modern slavery refers to situations where an individual is deceived, coerced or forced into exploitation. Modern slavery is an umbrella term which encompasses human trafficking, servitude and forced or compulsory labour. It is outlined in the Modern Slavery Act 2015.</p>
<p><b>National Referral Mechanism (NRM)</b></p>	<p>The National Referral Mechanism (NRM) is a Government framework for identifying and referring victims of modern slavery. The NRM was introduced in 2009 to meet the UK's obligations under the Council of European Convention on Action against Trafficking in Human Beings.</p> <p>Only First Responders can make referrals to the NRM. Adult victims of modern slavery must give informed consent to enter the NRM. If they do not wish to enter, an anonymous Duty to Notify referral can be made. All children who are suspected of being a potential victim of modern slavery must be referred into the NRM.</p> <p>For adult victims, the NRM provides support through the Victim Care Contract. The NRM does not safeguard a child so existing child safeguarding procedure should be followed first and foremost.</p>
<p><b>Premises selling sexual services</b></p>	<p>Brothel is the definition used in legislation to refer to premises from which one or more individual is involved in selling sexual services. This can include residential properties, hotel rooms, massage parlors, and walk up flats.</p> <p>Where possible we will avoid using the word brothel because it can limit our understanding of the context in which individuals are involved in prostitution or experiencing sexual exploitation. Instead we recommend describing the property, e.g. "We are making a welfare visit to a residential flat/massage parlour/hotel".</p>
<p><b>Single Competent Authority</b></p>	<p>The Single Competent Authority (SCA) is a body within the Home Office who receive all NRM referrals from First Responders and make the Reasonable Grounds Decision, Conclusive Grounds Decision, and oversee the submission of the Recovery Needs Assessment.</p>
<p><b>Smuggling</b></p>	<p>Smuggling is a voluntary one-off transaction, whereby a person pays another person to help them enter a country clandestinely. It is a crime against the state, whereas human trafficking is a crime against an individual. Smuggling must include a border crossing. Human trafficking may include a border crossing, but this is not required to meet the definition.</p> <p>With smuggling the relationship between smuggler and smuggled person ends when they reach their destination. In some cases, smuggling may turn into trafficking if exploitation occurs or a person finds themselves owing money for their journey and is made to work to pay this off.</p>

<p><b>Trauma-informed Support</b></p>	<p>Trauma-informed support recognises the harmful effects of traumatic experiences and aims to minimise the risk of causing further distress. This is done through respect and compassion and working towards long-term stability.</p>
<p><b>Victim/Survivor</b></p>	<p>The word ‘victim’ can be helpful for people to come to terms with their experience and know that the exploitation meant they were a victim of crime. The official term for a person entering the NRM is a ‘potential victim’. However, ‘victim’ can also appear disempowering and reduce a whole person to a label.</p> <p>The term ‘survivor’ can be preferable as it has connotations of strength. Therefore ‘victim/survivor’ is used wherever possible.</p>
<p><b>Victim Care Contract (VCC)</b></p>	<p>Adults in the NRM who receive a Positive Reasonable Grounds Decision can access support through the Victim Care Contract, awarded by the Home Office to The Salvation Army (2020-2025). Through the VCC victims can access safehouse accommodation, a support worker, subsistence rates and access to health care and legal advice, no matter their immigration status or when or where the exploitation took place.</p>
<p><b>Violence against Women and Girls (VAWG)</b></p>	<p>The United Nations defines violence against women and girls as any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life.</p>
<p><b>Vulnerability</b></p>	<p>There are multiple forms of vulnerability outlined in the UN Organisation on Drugs and Crime guidance, such as Personal, Situational and Circumstantial vulnerability. These vulnerabilities may be pre-existing (e.g. poverty) and therefore increase the risk of exploitation; and vulnerabilities can also be created by the exploiter (e.g. romantic attachment).</p>
<p><b>Women involved in Prostitution</b></p>	<p>‘Women involved in prostitution’ is the preferred term used in the boroughs as this addresses someone’s circumstance rather than using a label which puts upon them an identity.</p> <p>This is preferable as in some cases, ‘Sex work’ has led to professionals overlooking vulnerabilities, risk and exploitation.</p>

## 8. Appendix 2: Questions you could ask

**There are often many barriers, including language, preventing someone from answering 'yes' to the question, 'are you a victim of modern slavery'? Avoid questions which could re-traumatise individuals and focus on open, needs-led questions.**

The following questions could be asked if it is safe to do so. Conversations should be held in a safe setting, with qualified interpreters if required. Survivors shared that they need time to build up trust but that it was important people asked the questions and were open-minded and listened to the answers.

- 1. Do you feel safe?**
- 2. Is anyone making you do something you don't want to?**
- 3. How many hours a day do you work?**
- 4. Are you being paid for your work?**
- 5. Do you have access to your bank account?**
- 6. Who would you call if you needed help?**
- 7. Can you tell me about your situation?**

## 9. Appendix 3: Resources

- [Directory of Survivor Support Services](#)
  - [Modern Slavery Act 2015, Statutory Guidance](#)
  - [NRM info in different languages \(West Midlands Partnership\)](#)
  - [Helen Bamber trauma-informed support guide & HTF Survivor Care Standards](#)
  - [STOP THE TRAFFIK spot the signs](#)
- 

## 10. Appendix 4: Signs to look out for

Below are some indicators that someone may be experiencing modern slavery or exploitation. It is important to recognise that everyone responds differently and that this list is not exhaustive:

- Fearful, anxious or distrustful of authorities
- Appears malnourished
- Shows signs of trauma (physical/psychological)
- Suffers injuries that may be the result of controlling measures or that have been left untreated
- Unfamiliar with local language/context
- Do not know their home or work address
- Has a story that sounds rehearsed
- Dependency & presence of a Controller - allows others to speak for them when addressed directly
- Believe they have debt to pay off
- Separated from their ID documents
- Do not have any days off or unable to leave their work environment
- Has limited/no social interaction
- Reveals threats have been made against them or their family

## English

Information from this document can be made available in alternative formats and in different languages. If you require further assistance please use the contact details below.

## Arabic

يمكن توفير المعلومات التي وردت في هذا المستند بصيغ بديلة ولغات أخرى. إذا كنت في حاجة إلى مزيد من المساعدة، الرجاء استخدام بيانات الاتصال الواردة أدناه.

## Farsi

اطلاعات حاوی در این مدارک به صورتهای دیگر و به زبانهای مختلف در دسترس می باشد. در صورت نیاز به کمک بیشتر لطفا از جزئیات تماس ذکر شده در ذیل استفاده کنید.

## French

Les informations présentées dans ce document peuvent vous être fournies dans d'autres formats et d'autres langues. Si vous avez besoin d'une aide complémentaire, veuillez utiliser les coordonnées ci-dessous.

## Portuguese

A informação presente neste documento pode ser disponibilizada em formatos alternativos e em línguas diferentes. Se desejar mais assistência, use por favor os contactos fornecidos abaixo.

## Somali

Macluumaadka dokumentigan waxaa lagu heli karaa qaabab kale iyo luuqado kala duwan. Haddii aad u baahan tahay caawinaad intaas dhaafsiisan fadlan isticmaal xiriirka faahfaahinta hoose.

## Spanish

La información en este documento puede facilitarse en formatos alternativos y en diferentes idiomas. Si necesita más ayuda por favor utilice la siguiente información de contacto.

Visit [www.rbkc.gov.uk/community-and-local-life/community-safety/modern-slavery](http://www.rbkc.gov.uk/community-and-local-life/community-safety/modern-slavery) for more details

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