



Local Modern Slavery Partnerships:

Recommendations and Learnings from Hertfordshire

By Kate Rolle, Former Hertfordshire Modern
Slavery Partnership Coordinator (2018 - 2021)



Foreword



Becoming a local councillor at Hertsmere Borough Council in 2015 gave me a platform and an opportunity to address modern slavery risk within the council. I knew that estimates suggested tens of thousands of victims in this country; I knew that no region was immune to this crime; and I knew that this was something I could help address as the Founder and Director of Shiva Foundation, an anti-slavery organisation. I began to speak with various people around the community and found a mirrored passion to combat this crime in the Hertfordshire Police and Crime Commissioner, David Lloyd. We have worked together since 2017 to create an anti-slavery partnership that has been recognised in multiple publications as best practice. With the continuous support of Leader of the Council, Cllr Morris Bright MBE and the Rt Hon Oliver Dowden CBE MP, we have built up the capacity of local stakeholders to work together, spot modern slavery and support victims throughout Hertfordshire. The partnership now includes 152 members, 337 victims have been identified and 238 modern slavery offences have been recorded, 105 organisations have been trained and 37 resources have been produced to help with identifying and reporting. This report is a thorough reflection of our learning throughout the past four years. We are proud of what we have achieved and hope that this report can help influence best practice around the country.

Cllr Meenal Sachdev, Hertsmere Borough Council
Founder and Director, Shiva Foundation



Shiva Foundation and I have long shared the view that there is no place for modern slavery in Hertfordshire. Since 2018 I have helped fund a Modern Slavery Coordinator as I recognised the importance of building a multi-agency partnership and strategy for the county. We are now in a strong position with the right governance and coordination, engagement and training in place to help spot the signs of modern slavery, safeguard victims, and bring offenders to justice. This Local Modern Slavery Partnerships: Recommendations and Learning from Hertfordshire report provides a comprehensive view of the work undertaken and makes helpful recommendations for next steps. It provides us all an opportunity to reflect and continue to build on the successes of the last four years.

David Lloyd, Police and Crime Commissioner for Hertfordshire

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This report was written by Kate Rolle as a reflection from her time as Coordinator of the [Hertfordshire Modern Slavery Partnership \(HMSP\)](#). The perspective, outputs and successes listed in this document related to Hertfordshire and the HMSP could not have been possible without the dedication and input of partners of the HMSP. A great deal of research and good practice have informed HMSP's work and this report; platforms and spaces for sharing that type of practice, such as the National Network Coordinators Forum have been invaluable. Thank you to the partnerships around the country and all of the key stakeholders committing their time to preventing modern slavery. This report highlights that it is not easy work; it is work that is often thankless, underfunded and voluntary – yet hundreds of people continue to strive for the eradication of this crime under these difficult circumstances.

[Shiva Foundation](#) is a corporate foundation dedicated to tackling human exploitation in all forms by working with those fighting it. Shiva Foundation was integral to the formation of the Hertfordshire Modern Slavery Partnership and acted as its Coordinator for 4 years.

“We all must invest in the future of anti-slavery partnerships so that the UK can be leading in its approach to tackle and prevent modern slavery. A proactive and effective response will depend on this renewed commitment and we look to UK Government to lead the way.”

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Executive Summary

Anti-slavery partnerships began to develop as the country became more and more aware of modern slavery and how it affected people in the UK. Partnerships really gained steam after the Modern Slavery Act 2015 came into force and they continue to evolve around the country. Partnerships now cover 43 out of 45 territorial police force areas in the UK.¹

The organic development of anti-slavery partnerships was important initially because it meant activity was taking a localised approach and was responding to the unique needs of the area. But as time passes, there are identified areas where more standardisation, national guidance and sustainable resource would be beneficial. Partnerships have developed excellent ways of working and tools which we wanted to highlight, while also making recommendations for how great practice can be enhanced and more widely embedded.

This report was written from the perspective of having set up and coordinated an anti-slavery partnership in Hertfordshire. Shiva Foundation wanted to reflect on the past few years and the headway made and to share the lessons we've learned. The purpose of this report is to highlight what we have identified as the fundamental elements of an anti-slavery partnership, in case it can be of help to other areas or those looking to establish their own multi-agency way of working to address modern slavery. Alongside this, the report will highlight what works well, what limitations exist, why the coordinator role is integral, and how we can all move forward to identify and appropriately support more victims and survivors.

For each fundamental element of partnership working, we give the national context as well as a Hertfordshire-centric perspective. We then put forward recommendations to help these elements thrive.

¹ University of Nottingham Rights Lab (2019) Partnerships for freedom: Improving multi-agency collaboration on modern slavery, p.11: <http://online.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2020/september/partnerships-for-freedom.pdf>.

Fundamental Partnership Elements

1. Defined Multi-Agency Pathways and Processes

Multi-agency working can only be effective and consistent if undertaken through a defined framework, pathway and process.

Recommendation: Anti-slavery partnership working should be a statutory duty for key organisations. Partnership working should come with local reporting pathways which are grounded in a national framework highlighting key elements for inclusion. Similar to domestic abuse, modern slavery case reviews should come to a nationally enforced and resourced MARAC structure.

2. Senior Leadership Buy-In, Governance and Accountability

Good partnership governance is important to the success of anti-slavery partnerships as it impacts on the authority, accountability, leadership and direction of its activities. Evaluation is an important part of understanding partnership impact and ensuring accountability.

Recommendation: Anti-slavery partnerships should be accountable to targets for progress; these targets can be broad but should have an element of standardisation and would benefit from a national and Government-led framework. For example, best practice for a partnership might include establishing a tailored and localised strategy, having and tracking yearly action plans, evaluating activity and impact; any targets would be grounded in a framework for accountability (e.g. who is holding the partnership accountable to these targets). This would align with the statutory duties set out in recommendation 1 and supported by ring-fenced funding.

3. Capacity and Engagement

The capacity that organisations, through individual staff, are able to allocate to anti-slavery partnerships has a direct impact on the success of the partnerships. If left to individual enthusiasm to take on what is effectively a voluntary additional role, partnerships will not be able to consistently and effectively work together.

Recommendation: The best way of securing sustainable commitment for effective multi-agency work is to have ring-fenced resource for both the staff taking on these roles (e.g. Single Points of Contacts, SPOCs) and the coordination and activities of the partnership. We recommend budget be allocated to statutory agencies with a duty to identify, report and respond to modern slavery, specifically for these purposes.

4. Training, Expertise and Reporting

If practitioners are unable to identify and report modern slavery because of a lack of knowledge, victims will not be identified and perpetrators will be left undeterred in their efforts to exploit people in inhumane conditions for profit. We have seen evidence that training increases NRM referrals, however there lacks consistency in training provision across the country.

Recommendation: Mandatory modern slavery training should be introduced to ensure that public authorities are aware of the crime and their duties under the Modern Slavery Act 2015. This training should be embedded within professional qualifications and inductions as appropriate. To bring consistency and a high level of quality to training, we recommend the Government allocate funding to a multi-agency board-led train the trainer programme, grounded in a standardised nationally approved training programme.

5. Funding

The amount of funding and resource committed to an issue area directly affects the development, quality and services related to that area. Without funding, people cannot be recruited to undertake activities or purchase items that support a partnership with its goals; the risk is that addressing modern slavery will seem like an add on and won't be given the time and capacity required to effectively deliver it in any sustainable way.

Recommendation: Local partnership coordinators should be funded sustainably through a national framework to develop anti-slavery work and consistently monitor performance. Anti-slavery partnership activities should be able to access funding through a collaborative local innovation fund and statutory organisations should also be provided with ring-fenced funding to meet their role and responsibilities in relation to the anti-slavery agenda.

6. Coordination

Coordinators are key to multi-agency partnerships, filling an important role in keeping local activities in line with and grounded in national best practice and guidance. Having a central point of contact and support is vital for maintaining momentum among stakeholders to continue to focus on modern slavery. Comparing partnerships with and without coordinators, there is a notable increase in the activities of partnerships supported by coordinators.

Recommendation: The coordinator role is pivotal to driving anti-slavery work forward in the various regions within the country. Not only must this role be funded in each partnership, but where this role sits should be consistent across the UK. In addition, the Government should be clear about the responsibilities of the coordinator and these responsibilities should be drawn across a multitude of overlapping areas.

7. Consistent, Clear and Up-To-Date Messaging

Clear and consistent messaging is essential for anti-slavery partnerships because it ensures that all stakeholders are fully aligned, and that they progress in the same direction, telling the same story and creating consistent touch points for other stakeholders, clients and residents.

Recommendation: Anti-slavery partnerships should be required to allocate resource locally to producing consistent, clear and up-to-date messaging on modern slavery, which is also linked with national guidelines, legislation and other areas of best practice. This ensures that increased awareness of the issue is based on factual evidence, reducing the possibility of misinformation being shared.

8. Data Recording: National and Local Data sets

Data helps to increase understanding of the overall picture and to improve related services and programs. Strong data is central to pursuing the most effective response. However the current approach to collecting data and subsequently understanding the prevalence of modern slavery is problematic due to its limitations. Most organisations who are likely to encounter a victim have no mandate to record cases and we're left relying on NRM data and police referrals.

Recommendation: It's important for partnerships to work to build a more holistic picture of the problem with various datasets. This can be enhanced by the UK Government establishing a framework of specific data recording requirements for individual stakeholder organisations. Furthermore, a flag system for modern slavery indicators should be implemented across all government departments and statutory agencies and consistently provided. These local and national datasets could then be centrally amalgamated and analysed by a single entity.

Introduction

Anti-slavery partnerships are continuing to evolve around the country. Police force areas that lacked partnerships in 2017, have now established them. The nature and structure in already embedded partnerships has developed and been augmented. Partnerships now cover 43 out of 45 territorial police force areas in the UK.²

The journey to setting up the [Hertfordshire Modern Slavery Partnership](#) started in 2016 after the passing of the Modern Slavery Act 2015 (MSA). In November 2016, an initial meeting was organised between local stakeholders in Hertfordshire. The four leading stakeholders (police, upper-tier local authority, [Shiva Foundation](#)³ and the Hertfordshire Police and Crime Commissioner) agreed to work together to organise a conference: [‘Tackling Modern Slavery in Hertfordshire: A Multi-Agency Vision’](#), which was attended by over 250 stakeholders in February 2017.

Off the back of the conference, the foundations for the Hertfordshire Modern Slavery Partnership (HMSP) were laid and the Steering Group (Partnership board) met for the first time in May 2017. At this meeting, Shiva Foundation formally agreed to act as the part-time independent coordinator for the Partnership for one year, with a review to take place in May 2018. Following this review, it was agreed that the coordinator should become a full-time post and this role remained in place until June 2021. Shiva Foundation remained as the coordinator throughout that time.

As highlighted in multiple research papers by the University of Nottingham Rights Lab, multi-agency partnership work is frequently said to be critical in developing coherent national and local responses to slavery, and yet there is minimal national guidance available on what partnerships should do and how they should conduct their work. In line with the findings of the limited research available and from the perspective of the former coordinator of a local multi-agency anti-slavery partnership, the purpose of this report is to highlight what we have identified locally as the fundamental elements of an anti-slavery partnership. Alongside this, the report will highlight what works well, what limitations exist, and why the coordinator role is integral.

Exploitation has always existed in some form. However, it was the growing international recognition of modern slavery and human trafficking that led to the introduction of the National Referral Mechanism (NRM) by the UK Government in 2009 to support victims of trafficking. The MSA was passed several years later, which introduced the term ‘modern slavery’ into law for the first time, along with a statutory duty for specific organisations (NRM First Responders)⁴ to identify and report modern slavery in line with a specified process. The MSA succeeded in bringing the subject to the forefront of the political agenda, but it failed to sufficiently address the extremely low level of national knowledge and expertise around the issue among key public and third sector stakeholders. Consideration of this reality is vital to understanding the context around the development of anti-slavery partnerships across the UK.

2 University of Nottingham Rights Lab (2019) Partnerships for freedom: Improving multi-agency collaboration on modern slavery, p.11: <http://online.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2020/september/partnerships-for-freedom.pdf>.
 3 Shiva Foundation is a charity whose goal is to end human exploitation in all forms by fostering collaboration between and increase the capacity of organisations working to prevent exploitation and support survivors. See www.shivafoundation.org.uk for further information.
 4 NRM First Responders are individuals from designated [First Responder Organisations](#) that have a statutory duty to notify the Home Office when there are reasonable grounds to believe a person may be a potential adult or child victim of modern slavery and/or human trafficking, irrespective of consent.

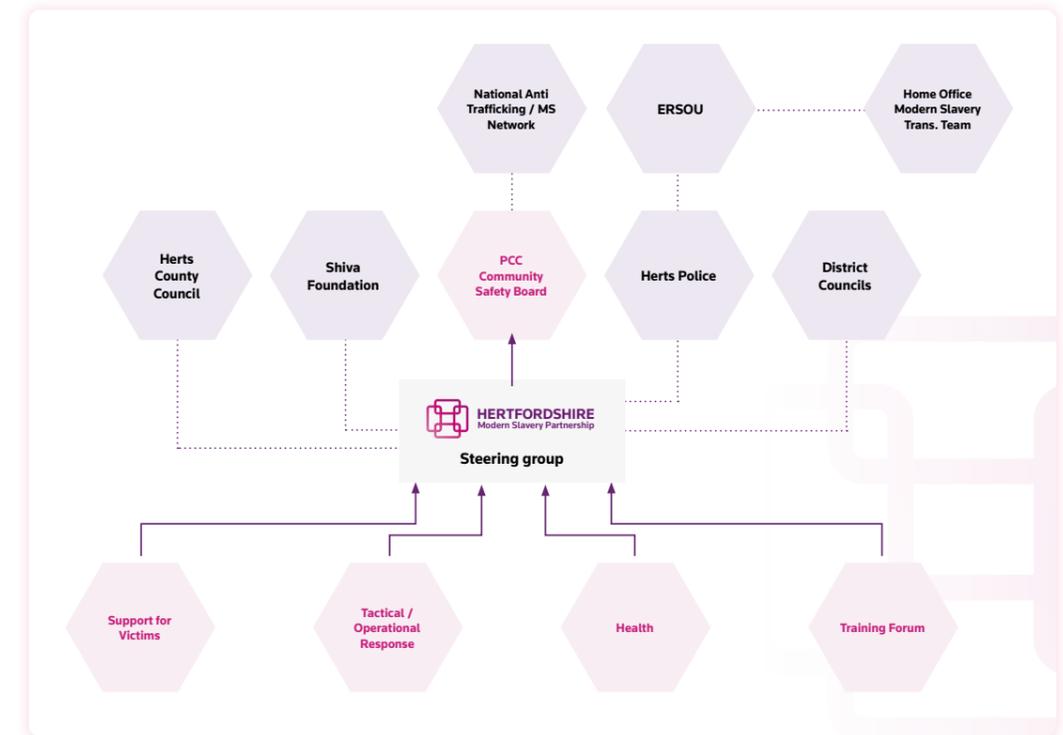
Hertfordshire Profile

Structure

The Hertfordshire Modern Slavery Partnership (HMSP)⁵ brings together more than 100 statutory and non-statutory partners from across the county to tackle human trafficking and modern slavery in all its forms. This multi-agency group is made up of representatives from Hertfordshire County Council (HCC), the Police and Crime Commissioner’s (PCC) Office for Hertfordshire, Shiva Foundation, Hertfordshire Constabulary, District and Borough Councils, NHS trusts, charities, non-government and government agencies and more. Established in 2017, its aim was to provide a strategic meeting framework for Hertfordshire to raise awareness, share information and proactively work together to ensure a consistent and robust approach to tackling modern slavery; utilising this shared strategy and resulting action plans to achieve a set of shared aims and objectives. Partnership aims are achieved through the voluntary commitment of member agencies to work together effectively in support of an agreed vision and strategic approach. HMSP’s work is overseen by the Police and Crime Commissioner for Hertfordshire Community Safety Board (CSB) and is coordinated by an independent coordinator, jointly funded by the PCC for Hertfordshire and Shiva Foundation.

Governance 2017-2020

From May 2017-March 2020, the HMSP was led by a modern slavery focused strategic Steering Group overseeing subject-focused subgroups. The HMSP reported to the Police and Crime Commissioner’s Community Safety Board. For further information, see [HMSP Strategy 2018-2021](#) which also contains the original governance structure.⁶



5 The Hertfordshire Modern Slavery Partnership website can be accessed through the following URL: <https://www.stopexploitationherts.org.uk>.
 6 HMSP (2020) *TACKLING MODERN SLAVERY TOGETHER - The Hertfordshire Modern Slavery Partnership Strategy 2018 – 2021*: <https://www.stopexploitationherts.org.uk/media/docs/hmsp-strategy-2018-2021.pdf>.

Governance 2020 Onwards

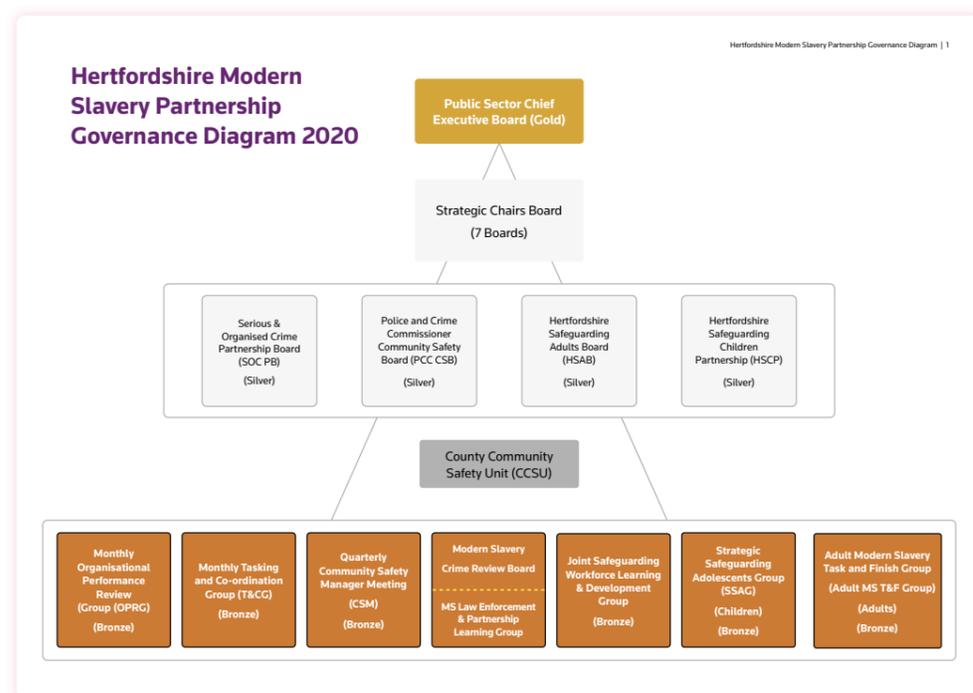
Since March 2020, the HMSP has been led by the Serious and Organised Crime Partnership Board (SOC PB), in collaboration with the [Hertfordshire Safeguarding Adults Board \(HSAB\)](#) and the [Hertfordshire Safeguarding Children's Partnership \(HSCP\)](#).

“Six years on, almost every part of the UK has some form of anti-slavery partnership, undertaking activities such as victim identification and referral; enforcement and frontline training”

The following operational and strategic groups fulfil HMSP priorities and actions:

- Hertfordshire Safeguarding Boards Joint Safeguarding Learning and Development Group
- HSCP Strategic Safeguarding Adolescents Group (SSAG)
- HSAB Adult Modern Slavery Task and Finish Group
- Modern Slavery Crime Review Board (yet to be established)
- Modern Slavery Law Enforcement and Partnership Learning Group
- Community Safety Managers' Meetings

This change has taken place in an effort to embed a 'business as usual' approach to tackling modern slavery in line with the HMSP's strategic priorities, as well as to enhance accountability and oversight over the issue across Hertfordshire. For a more detailed overview of the new governance structure, see [HMSP Partnership Governance Diagram 2020](#).⁷



“...multi-agency partnership work is frequently said to be critical in developing coherent national and local responses to slavery, and yet there is minimal national guidance available on what partnerships should do and how they should conduct their work.”

⁷ HMSP (2020) *Hertfordshire Modern Slavery Partnership Governance Diagram 2020*: <https://www.stopexploitationherts.org.uk/media/docs/governance/hmsp-governance-document-2020-v2-final.pdf>.

BOX 1 - Key Partnership Achievements:

Strategic Priority 1 - Awareness Raising:

- Membership of the Partnership increased from 40 members in 2017 to 152 by 2021 (+280%).
- Partnership newsletter readership expanded from 53 in 2017 to 716 stakeholders in 2021 (+1,250%).¹
- A Twitter account (twitter.com/HertsMSP) and an external facing website was set up in 2018 (www.stopexploitationherts.org.uk).
- Delivery of 12 public awareness campaigns and engagement by 91 local and national partners in at least one of these campaigns.
- Modern slavery linked to Hertfordshire has been featured in 82 news articles.²
- Partnership tweets earned a total of 970 retweets, 1.4k likes and a 2.5k engagement rate.³
- 30 member organisations have content on modern slavery on their websites and/or staff intranets.

Strategic Priority 2 - Reporting:

- 337 victims have been identified since 2016 and 238 modern slavery offences recorded (between April 2019 and June 2021).⁴
- 160 SPOCs have been identified across 82 organisations whose contact details are available in a local directory.⁵
- 22 member organisations have a modern slavery or exploitation recording category.
- Creation of county-specific adult and child reporting pathways for First Responders and Non-First Responders

Strategic Priority 3 - Policies:

- 7 public sector organisations have modern slavery statements, including 4 local authorities.
- 5 local authorities have signed up to the Charter Against Modern Slavery.

Strategic Priority 3 - Training and Resources:

- 20 member organisations have embedded modern slavery training internally.
- 105 organisations have been trained to identify and report modern slavery.⁶
- 37 HMSP resources have been created, including a 190-page [National Enforcement Powers Guide](#).⁷

Strategic Priority 4 - Victim Support:

- An emergency agreement to set up reception centres where five or more victims are identified.
- Beacon, the local victim support service, is embedded in the modern slavery reporting pathways as the local casework support provision for practitioners to refer to.

Strategic Priority 5 - Disruption:

- Over 30 modern slavery operations have been undertaken.
- 12 organisations have taken part in at least one multi-agency operation or visit

Strategic Priority 6 - Monitoring and Evaluation:

- 3 public evaluations of the partnership have been published, alongside 5 internal bi-annual evaluation reports.

¹ Data accurate as of October 2021.

² Data from April 2017-June 2021.

³ Data from 01 April 2019-31 October 2021.

⁴ Data accurate as of June 2021.

⁵ Data accurate as of July 2021.

⁶ Data accurate as of July 2021.

⁷ Published in 2021, the National Enforcement Powers Guide is a law enforcement reference document encouraging greater multi-agency working, providing a summary of the legal powers, roles and responsibilities of 14 law enforcement agencies in England and Wales. The guide was produced in collaboration with the Modern Slavery and Organised Immigration Crime Unit (MSOIC) and the National Network Coordinators Forum (NNCF) coordinated by the Human Trafficking Foundation: <https://www.policingslavery.co.uk/working-with-partners-and-the-public/national-enforcement-powers-guide/>.

This lack of essential knowledge is a substantial obstacle to effective communication with a victim who has to then make a decision on whether they want to enter the NRM based on fragmented information. Basic questions from a client such as ‘Where will I be taken to?’ or ‘What will that accommodation look like?’ cannot be answered when establishing consent for the NRM. Only once consent is given, can The Salvation Army undertake an assessment and determine where an individual is going to be moved to. People also have local connections which they do not wish to lose when given new accommodation in an unknown location, where they will be classified as ‘safer’ but without the support of their social network. Therefore, the idea that people who have just been identified will consent to this system is not realistic. This is supported by national evidence. The Passage¹² Anti-Slavery Project, which resulted in the identification and direct support of 61 victims found 56% (n=35) of potential victims refused government support and only 22% (n=14) accepted to enter the NRM. All those that refused government support, however, did consent to receive homelessness services (e.g. reconnection, assisted voluntary return or welfare support).¹³

Local authorities in particular, who have a safeguarding role, have struggled with the lack of guidance and resource to actually deliver that role and safeguard vulnerable victims. Some have developed internal referral pathways for victims, but questions remain about exactly which department should be responsible for the cost of supporting victims of modern slavery.¹⁴ Furthermore, they are failing to see the link with other priorities, such as domestic abuse or cuckooing. Modern slavery isn’t being considered and it never ends up getting the attention and resource it needs.

1.2 Hertfordshire Perspective

Local Adult and Child Victim Referral Pathways: To determine the true scale of the issue in the county and ensure that all victims are effectively safeguarded and supported, the HMSP developed referral pathways and associated documents to guide anyone who may meet a potential victim to respond. Prior to such a pathway and process being established to clearly define expectations on local agencies, identification and reporting had been patchy and subsequent interventions were inconsistent and on an ad hoc basis. Over the course of 24 months in collaboration with 25 agencies, two referral pathways were established in November 2020: one for child victims and one for adult victims. Although these pathways have provided some clarity, it is important to note that the success of these pathways has been impacted by the lack of clear guidance on responsibilities and dedicated resource. In addition, 73% (n=33) of local stakeholders surveyed confirmed that their organisation has now embedded a reporting pathway.¹⁵

Multi-Agency Approach to Supporting Victims (Children): There is already a pre-existing multi-agency model for discussing child cases of modern slavery in Hertfordshire, which for the most part, works relatively well. In recent years, Hertfordshire has sought to embed this approach further with positive results. For example, with all NRM submissions requiring a multi-agency decision in line with the child victim referral pathway, the quality of NRM form submissions has gone up significantly, with information being better shared between agencies. Increased collaboration between local authority children’s social care and the police has also resulted in a reduction in NRM submission duplications by First Responders from different statutory organisations.¹⁶

“Multi-agency working can only be effective and consistent if undertaken through a defined framework, pathway and process.”

12 The Passage is a charity which runs London’s largest voluntary sector day centre for homeless and vulnerable people.

13 The Passage (2020): ANTI-SLAVERY PROJECT 2018/2020: Findings and Recommendations from the first two years of The Passage Anti-Slavery Project, p.3 and p.10: <https://passage.org.uk/wp-content/uploads/2020/06/The-Passage-Anti-Slavery-Project-Report-2018-2020.pdf>.

14 Justice and Care (2020), p.55.

15 Findings taken from a HMSP Evaluation Surveys (General and SPOCs) undertaken in 2021. (Total: 45 responses)

16 Notes from a meeting with a local police stakeholder.

Supporting Examples: A MARAC model hasn’t been established in the county and this has had consequences in a number of adult cases in Hertfordshire, particularly where care and support needs have not been initially identified. There have been examples of cases where referrals have been made to relevant agencies, including different internal departments, but no ownership has been taken. Incidents have then escalated, resulting in the deterioration or injury of a victim. In another case, disagreements in relation to the respective roles of statutory and non-statutory organisations led to the re-exploitation of another victim, who was accommodated in unsuitable housing. What would have helped in all of these cases is an established forum to bring all the agencies together to agree the appropriate course of action.

Multi-Agency Approach to Supporting Victims (Adults): The local multi-agency approach to child victim support is not replicated for adults and there is a lack of external and internal processes. All member organisations (statutory and non-statutory – e.g. health, local authority, charity, police) pointed to a lack of clarity in terms of specific duties and roles of partner agencies which results in an isolated and ad hoc approach with limited information being shared between relevant partners. Current statutory guidance does not provide clarity on who should safeguard, undertake assessments, provide accommodation or give ready-to-use provisions to adult victims. Subsequently, there is no agreement on who should source funding, ensure suitability of accommodation and provide support, particularly when accommodating those with no recourse to public funds (NRPF) or who need to move to a different district area for safety reasons.¹⁷

There have been efforts made to rectify this issue and an informal process has been established. However, it lacks resource and a funding and accountability structure. It is also hindered by the lack of more clearly defined statutory responsibilities from Government.



1.3 Recommendation

Multi-agency working to identify, respond to and prevent modern slavery should be a statutory requirement for key stakeholders (e.g. police, local authority, PCC). Similar statutory requirements are set out in the [Counter Terrorism and Security Act 2015](#) (see sections 36-38), which offer an example of how guidance on this type of statutory responsibility for collaboration could look. The responsibility for partnership working should come with some guidance on what this work would involve, including the duty to set up reporting pathways grounded in a national framework outlining key elements. Similar to domestic abuse, modern slavery case reviews should come to a nationally enforced and resourced MARAC structure to enhance efficient multi-agency work and to drive appropriate responses (see [Section 5 on funding for further information on why this needed](#)).

17 As a contrasting example, [the Counter Terrorism and Security Act 2015, sections 36-38](#), gives clear guidance on statutory responsibility to run multi-agency panels, who must be involved and how collaboration must work. This type of clear guidance from national government would be welcomed in the anti-slavery space.



2. Senior Leadership Buy-In, Governance and Accountability

Good partnership governance is incredibly important to the success of anti-slavery partnerships as it impacts on the authority, accountability, leadership and direction of its activities. A key mechanism for effective governance is the creation of a partnership board made up of senior leaders that can provide the framework for strategic planning, implementation and monitoring of partnership performance and risk. Senior leaders are also the visible face of a partnership within their own organisations.

Consequently, they have a fundamental role in inspiring the rest of their organisation to effectively engage with anti-slavery efforts, helping the partnership to achieve its aims. Given that a partnership by its very nature is made up of a number of different organisations, governance is also key to sharing and embedding stakeholder responsibility within a standalone structure, which operates outside of the governance structures of individual organisations.

2.1 National Landscape

Governance Structures: Many anti-slavery partnerships have some form of governance structure, although this does vary. Most follow the basic framework of bringing relevant partners together to address agreed aims, with terms of reference and action plans utilised by the most developed partnerships. Given the lack of statutory guidance, the University of Nottingham has found in its 2019 evaluation report that a number of anti-slavery partnerships have been trying to explore the most suitable structure, particularly reflecting on how 'anti-slavery work can be normalised within broader structures'.¹⁸ Furthermore, the report highlights that key elements such as who the partnerships report into, how they fit into overlapping activity and broader work on exploitation or organised crime, as well as format and scale are important considerations. Where these elements are not working well, governance is not strong enough to ensure effective accountability and progression of activities.¹⁹

¹⁸ University of Nottingham Rights Lab (2019), p.33.
¹⁹ Ibid.

Accountability and Senior Level Buy-In: Taking Wales as an example of best practice, it is nationally regarded as a highly effective partnership due to being funded by and accountable to the Welsh Government on its delivery of a published action plan with strategic objectives. The partnership still relies on staff and resource commitments from partner organisations to deliver the work, but with clear lines of accountability, it can identify and address any engagement issues.²⁰

“Good partnership governance is incredibly important to the success of anti-slavery partnerships as it impacts on the authority, accountability, leadership and direction of its activities.”

This is not the case for many partnerships. Without statutory guidance or specific organisational requirements, governance and senior leadership buy-in can be an issue; responsibilities and leadership remain unclear.²¹ This facilitates an environment where victims continue to be unidentified or unsupported and criminals thrive.

Furthermore, organisations only engage within the specific remits of their roles; it is challenging to get them to take ownership of anything that sits outside of that. It is no surprise that the challenge of ownership and partner engagement has been identified by the University of Nottingham Rights Lab as a significant obstacle to making sufficient progress. Alongside this, the latest evaluation report highlighted the desire by anti-slavery partnerships for better strategic coordination at national level, and between national, regional and local levels.²² On a regional level, there are strong examples of coordinated activity (e.g. the [South West Anti-Slavery Partnership](#), [West Midlands Anti Slavery Network](#) and the Eastern Region Anti-Slavery Partnership), however these too can struggle with lack of dedicated and sustainable resource.

Evaluation: Evaluation requires use of output or outcome measures, looking at the immediate products and success of partnership work, along with the longer-term impacts. The University of Nottingham anti-slavery partnership reports (2017 & 2019), cited throughout this report, highlight that most partnerships (nearly 60% in 2019, an increase from about 50% in 2017) still believe that they are measuring and evaluating progress.²³ In reality, most performance monitoring by anti-slavery partnerships tends to focus on recording data on recording of meeting minutes and actions (just over 40%) or minor outcomes (just over 10%)²⁴ that are 'very process-focused' (e.g. number of people trained or exposure to awareness raising materials) and recording of meeting minutes and actions as the primary way to hold individuals and groups to account.²⁵ These methods are not sufficient for effective measurement and evaluation of partnership progress.

Evaluation of partnership activities, including those of individual organisations, is key to understanding the overall picture, diagnosing problems and identifying potential solutions. This includes analysis of risk factors, and understanding geographic, demographic, and sectoral strengths and weaknesses to identify threats, gaps as well as utilise assets within the community to help address exploitation. It is also key to holding stakeholders to account as it is this picture, supported by evidence, that helps to facilitate change and progression.

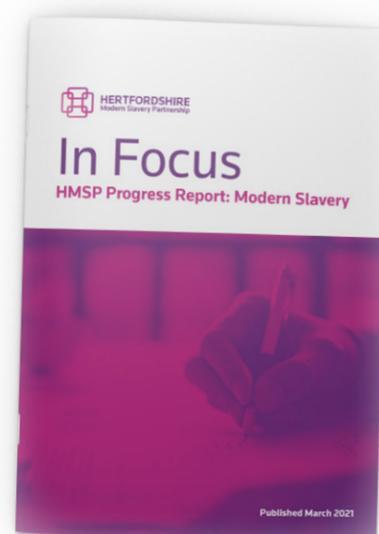
The result of inappropriate evaluation measures is that anti-slavery partnerships - for the most part - do not know if they are contributing to positive changes and impact. The University of Nottingham 2019 evaluation report highlights that action research in 2018 attributed these failings to 'an absence of shared vision, a lack of resources to collect data and concerns about data sharing'.²⁶ Partnerships must go a step further. The report attests that 'goal setting and action planning using SMART (Specific, Measurable, Attainable, Relevant, and Time-bound) objectives [will] help to set manageable performance

²⁰ University of Nottingham Rights Lab (2017), p.21.
²¹ University of Nottingham Rights Lab and Office of the Independent Anti-Slavery Commissioner (2017) *Collaborating for freedom: anti-slavery partnerships in the UK: A research report from the Office of the Independent Anti-Slavery Commissioner and the University of Nottingham's Rights Lab*: http://www.antislaverycommissioner.co.uk/media/1186/collaborating-for-freedom_anti-slavery-partnerships-in-the-uk.pdf.
²² Ibid, p.23
²³ University of Nottingham Rights Lab (2019), p.19.
²⁴ Ibid, p.22.
²⁵ University of Nottingham Rights Lab and IASC Office (2017), p.8.
²⁶ University of Nottingham Rights Lab (2019), p.5.

indicators that can more easily be monitored and evaluated'.²⁷ Taking training as an example, where impact should focus on an increase in identification and reporting, partnerships should be able to demonstrate that training has led to a change in internal processes or increased reporting. In terms of demonstrating the impact on victim support, it is essential for partnerships to 'improve the sharing, collection and application of evidence relating to the whole pathway of victim and survivor experience' (short and long-term).²⁸

2.2 Hertfordshire Perspective

From the outset in Hertfordshire, we had to engage with and establish buy-in from key senior stakeholders to get their support for the modern slavery agenda. Against the backdrop of the MSA, Shiva Foundation used the election of Councillor Sachdev – also its founder – and her local network as a springboard to establish the partnership. With backing from senior representatives from Hertfordshire Constabulary, the PCC for Hertfordshire and HCC, a local multi-agency conference was organised, attended by over 250 representatives from local statutory and non-statutory agencies. Support of the conference by senior stakeholders was key to ensuring that the issue was taken seriously across the county, facilitating engagement from a wide group of stakeholders. The conference laid the foundations for the HMSP, with accountability and buy-in underpinned by a partnership board (known as the steering group), terms of reference, partnership action plans and a strategy.



Above: HMSP Progress Report 2021

The importance of senior level buy-in did not diminish following the setting up of the partnership. In fact, the influence of senior leaders who sat on the Steering Group, was fundamental to maintaining momentum. Examples that demonstrate this importance include:

- Without clear statutory responsibility towards adult victims, we set up a task and finish group to reflect on how best to support them. This could not have been done without senior level buy-in.
- With Shiva Foundation coordinating as an external non-statutory entity, senior level buy-in provided the authority to access and encourage operational colleagues to engage more effectively with the HMSP.
- Approval by relevant boards led to the rolling out of the adult victim referral pathway across the county despite some initial unwillingness from some organisations to engage.

Accountability and Evaluation: In line with HMSP action plans, the coordinator sought to monitor and evaluate the impact of the HMSP, including sending bi-annual evaluations of partnership activities, as part of funding reports. Evaluation surveys, review groups and reports have also provided opportunities for formal feedback which have led to change and progress. In addition, senior leaders have been instrumental in facilitating county-led evaluations including a crime and disorder partnership scrutiny by County Council in 2018 and a public health orientated Joint Strategic Needs Assessment on Modern Slavery in 2019. The findings of these evaluations have then impacted on the direction of partnership activities. For example, the needs assessment identified that homelessness is a primary regional vulnerability,²⁹ which then led to the HMSP-run homeless campaign.³⁰

²⁷ Ibid, p.33.

²⁸ University of Nottingham Rights Lab (2018) *Measuring success in anti-slavery partnerships: building the evidence base through action research*, p.5: <http://online.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2018/december/measuring-success-in-anti-slavery-partnerships.pdf>.

²⁹ Hertfordshire County Community Safety Unit (CCSU) and Public Health Evidence and Intelligence Unit (2018): *Modern Slavery Strategic Needs Assessment*, p.45: <https://www.hertfordshire.gov.uk/microsites/jsna/jsna-documents/modern-slavery-jsna.pdf>.

³⁰ HMSP (2019) *Hertfordshire Modern Slavery Partnership Strategy 2018-2021: Summary*, p.2: <https://www.stopexploitationherts.org.uk/media/docs/hmsp-strategy-and-action-plan-in-summary.pdf>.

The impact of evaluation in facilitating change and progress was also demonstrated by submission of personalised progress review documents on modern slavery activities of individual Hertfordshire local authorities. These progress review documents led to the following example policy changes in three different councils:

- Introduction of a Recruitment Policy featuring modern slavery content for the first time
- Introduction of a Supplier Code of Conduct featuring modern slavery for the first time
- Embedding modern slavery content for the first time within the council Statement of Licensing Policy 2021 – 2026

BOX 2 – Impact of Modern Slavery Review Reports Timeline (Example Local Authority):

1. Modern Slavery Review Report highlighting Hertsme Borough Council's progress in tackling modern slavery was submitted to the Council (October 2019) to aid in embedding anti-slavery practices within the council. The report came with clear recommendations.
2. Subsequent Council Meetings
 - The review report was presented at a Council Policy Review Committee Meeting (December 2019) with nine recommendations for further actions that may be taken and agreed by the Executive (e.g. producing a council modern slavery strategy).¹
 - A Council Executive Meeting provided time for the Executive to consider and respond to recommendations (April 2020)² and these were ultimately agreed (July 2020).³
3. Following this, Hertsme Borough Council had its Modern Slavery Statement 2021-2022 reviewed and approved by the Policy Committee and Council Executive (July 2021).⁴

¹ Hertsme Borough Council Policy Review Committee: Minutes of the meeting held in Committee Rooms A & B, Hertsme Civic Offices, Elstree Way, Borehamwood (17 December 2019), pp.1-4: <https://hertsme.moderngov.co.uk/documents/g10565/Printed%20minutes%20Tuesday%2017-Dec-2019%2019.30%20Policy%20Review%20Committee.pdf?T=1>.

² Hertsme Borough Council: Minutes of the meeting held in Online and publicly viewable at [HTTPS://HERTSMERE.PUBLIC-I.TV/](https://HERTSMERE.PUBLIC-I.TV/) (20 May 2020), pp.6-7: <https://hertsme.moderngov.co.uk/documents/g10593/Printed%20minutes%20Wednesday%2020-May-2020%2019.30%20Council.pdf?T=1>.

³ Hertsme Borough Council: Minutes of the meeting held in Livestreamed online and publicly viewable at [HTTPS://HERTSMERE.PUBLIC-I.TV/](https://HERTSMERE.PUBLIC-I.TV/) (15 July 2020), p.8: <https://hertsme.moderngov.co.uk/documents/g10605/Printed%20minutes%20Wednesday%2015-Jul-2020%2019.30%20Council.pdf?T=1>.

⁴ Hertsme Borough Council: Meeting of the Council held in the Council Chamber Civic Offices, Elstree Way, Borehamwood, (21 July 2021), p.4: <https://hertsme.moderngov.co.uk/documents/g10881/Printed%20minutes%20Wednesday%2021-Jul-2021%2019.30%20Council.pdf?T=1>.



Homeless Campaign publicity materials

Challenges: Without a centralised higher authority in place to monitor modern slavery activity, accountability of member organisations, particularly at the senior level, will always be based on individual will. This is something that we have seen and ultimately struggled with in Hertfordshire.³¹ As long as buy-in remains down to the individual, it will inevitably falter with changing priorities, demands and staff. This impacts on partnership progress. Likewise, the responsibility for evaluating modern slavery data (or even recording and contributing data for the purpose of an evaluation) is also down to personal priorities, because for most organisations there is no statutory obligation to do this. That results in a less robust view of the issue in the area, undermining a more effective approach to tackling it. Without clear guidance on who should be responsible and how, this type of activity will always suffer from individual whim.



2.3 Recommendation

Anti-slavery partnerships should be accountable to targets for progress; these targets can be broad but should have an element of standardisation and would benefit from a national and Government-led framework. For example, best practice for a partnership might include establishing a tailored and localised strategy, having and tracking yearly action plans, and evaluating activity and impact on a regular basis.

These targets would be accompanied by a clear accountability framework that sets out who is holding the partnership to account for these targets. There must be greater clarity from central Government on the role of statutory organisations, which spells out their individual responsibilities, effectively embedding modern slavery within role descriptions to safeguard against staff changes. The activities required should be underpinned by specific ring-fenced funding so that organisations are able to effectively meet their statutory responsibilities and undertake annual evaluations (see Section 5 on funding for further information on why this needed).

³¹ Examples include when HMSP activity stalled because 7 out of 10 steering group members changed roles, leaving their HMSP responsibilities, and when one organisation removed its training capacity with little notice.



3. Capacity and Engagement

Capacity and engagement of member organisations is key for the progression of any partnership. The capacity that organisations, through individual staff, are able to allocate to the anti-slavery partnership has a direct impact on the success of the partnership. The greater capacity, the more likely that there will be sustainable progress in tackling modern slavery. Healthy and well-functioning partnerships will also operate in a way where capacity is shared among various stakeholders rather than reliant on a small number of individuals.

3.1 National Landscape

When it comes to anti-slavery partnerships, capacity is not always being identified in monetary terms, even though it should be as capacity requires a funded role. In light of this, some have historically viewed anti-slavery partnerships as an entity that required relatively little funding, given that this was every-day business for the partners engaged in this issue. It is no surprise that the University of Nottingham Rights Lab evaluation reports (2017 & 2019) continue to highlight staff time of member organisations as a key source of funding for the carrying out of partnership work.³² In certain cases, there may be a team that focuses on modern slavery, or a single lead, which supports the partnership, and this leads to greater progress. However, this is not the case for a number of partnerships. As a general observation, the greater the statutory responsibility, the greater capacity given. As a result, more focus and resource tend to be allocated to modern slavery issues affecting children (see Annex 3 for further information).

“The capacity that organisations, through individual staff, are able to allocate to the anti-slavery partnership has a direct impact on the success of the partnership.”

³² University of Nottingham Rights Lab (2019), p.24.

Adding to this, the 2019 evaluation report highlighted that the continuity of partnerships has ‘often proven reliant on the enthusiasm and commitment of a few local policy entrepreneurs’ as a result of the lack of statutory requirement or allocated resource to deliver activity.³³ This was also reiterated in the Justice and Care evaluation report published a year later that highlighted that the lack of government funding to deal with this crime locally is undermining an effective response due to the lack of necessary structures, policy and investment to make it ‘business as usual’.³⁴

Given the nature of modern slavery, the practitioners responsible for being involved have competing issue areas to devote attention to. For the most part, many organisations simply view modern slavery as another issue area added to a long list, which all require attention. As a result, the stakeholders expected to engage in this issue have extremely limited capacity to devote to progressing the agenda. Furthermore, this capacity and investment can vary from one year to the next. As a personality driven area, in cases where these individuals have changed jobs or moved on to new organisations, partnership activity often stalls or ceases entirely.³⁵ This trend is taking place across the UK, with ‘partnership working frequently seen as a voluntary endeavour, undertaken on top of existing workloads and responsibilities. Individuals and organisations are often then reluctant to undertake additional responsibilities and commitments’.³⁶ Covid-19 has simply made this worse.

3.2 Hertfordshire Perspective

In line with the national picture, the HMSP benefited enormously from the enthusiasm and commitment of individual stakeholders, working independently to progress the agenda internally and externally. This has been demonstrated by attendance of meetings, attendance of workshops or training sessions, feedback, embedding of modern slavery within core individual organisation training, publicity material dissemination and social media engagement. In Hertfordshire, 62% (n=28) of stakeholders had been involved in at least one HMSP group³⁷ and 64% (n=29) of local stakeholders confirmed that their organisation now has a designated modern slavery lead.³⁸ In particular, the contribution of the subgroup chairs, which was entirely voluntary, was invaluable for maintaining momentum in the early years of the HMSP.

Supporting Examples: The chair of the partnerships subgroup¹, who was a district council community safety manager, led the local authority approach towards tackling modern slavery, embedding a model action plan for implementation for individual districts. The chair of the victim support subgroup,² who was a PCC representative, was instrumental in writing and producing the partnership strategy, as well as leading negotiations to agree for funding to be allocated to producing a joint strategic needs assessment on modern slavery. From 2017 to 2019, the Detective Sergeant leading the dedicated police modern slavery team, who was also the tactical and operations subgroup³ chair, played an extremely active role in the HMSP. During this period, they became the public face of the partnership, proactively engaging with partners, delivering training, promoting multi-agency operations/visits and writing the first draft of the Home Office endorsed National Enforcement Powers Guide.

1 The purpose of the partnership subgroup was to share learning across the 10 districts and borough and to engage with the local community.

2 The purpose of the victim support subgroup was to discuss and improve how we work together to identify, support, protect and empower victims of modern slavery and human trafficking in Hertfordshire.

3 The purpose of the tactical and operations subgroup was to provide a forum for sharing intelligence between partners and planning joint enforcement.

33 University of Nottingham Rights Lab (2019), p.32.

34 Justice and Care (2020), p.52.

35 University of Nottingham Rights Lab (2019), p.16.

36 Ibid, p.5.

37 Findings taken from a HMSP Evaluation Surveys (General and SPOCs) undertaken in 2021. (Total: 45 responses)

38 Ibid.

However, the inputs made by stakeholders unfortunately decreased significantly when members either changed roles, subgroup chairs resigned, or members became hindered by capacity constraints (see Case Study A for an example of this). Like other partnerships, 39 a number of activities were then disrupted as a result of covid restrictions and partner efforts being focused predominantly on their organisation’s COVID-19 response, with no extra capacity to engage in other areas (e.g. the number of proactive or scheduled police operations and visits reduced dramatically, particularly those that are multi-agency). With the coordinator placed on furlough, they were also unable to provide support and engage in necessary meetings, resulting in their cancellation and a delay in the transition into a new governance structure.

BOX 3 (CASE STUDY A): Adult Victim Referral Pathway (V2)

An initial pathway was created which relied heavily on police as the primary NRM first responder (without clear statutory guidance, Hertfordshire experienced a continued unwillingness due to resource and capacity concerns by the top tier authority to be the first point of safeguarding contact for adult victims). The police feared they wouldn’t have the capacity to deal with all referrals and after a lengthy consultation process, greater responsibility was placed on lower tier local authority operational leads to support in the identification and reporting of adult victims of modern slavery in their district. The operational leads saw the pathway as an additional responsibility, which they would have to take on, on top of their other demanding responsibilities, and with no additional resource and funding.

This pathway was already a compromise of statutory organisation capabilities linked to capacity issues and outlined statutory remits. Conflict over this pathway represents a wider issue of tension between upper and lower tier local authorities around statutory safeguarding responsibilities towards adults without assessed care and support needs, as well as other agencies who simply struggle to engage with the issue because of the lack of resources. As a two-tier authority, Hertfordshire has struggled to embed a framework to resolve this conflict, which is palatable to all local authorities within the county. After an initial six month pilot period whereby the pathway was implemented, the post-pilot evaluation found that 35% (n=6) of First Responder leads believed the pilot had required more capacity than they were expecting, reflecting the complexity of the issue area and breadth of intervention required in modern slavery cases.

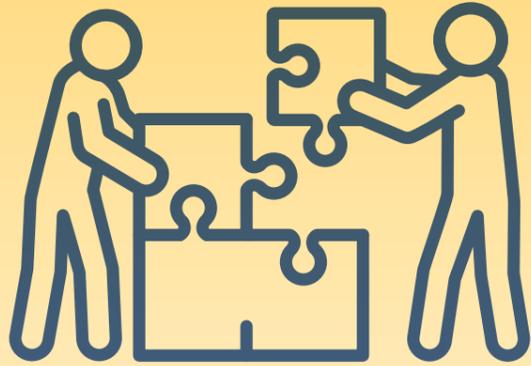
Without clear capacity demarcated within participating agencies, the coordinator’s role has been extremely important to maintaining momentum and progressing elements, but particularly as the COVID-19 pandemic developed. Without resource dedicated to this type of coordination, such activities as listed below, would have fallen by the wayside in Hertfordshire. These activities include taking over the coordination of the victim support subgroup after the chair stepped down to move to another role, writing progress review documents for individual local authorities and producing publicity materials (see Section 6 on the coordinator for more information on the value of this role).



3.3 Recommendation

The best way of securing sustainable commitment for effective multi-agency work is to have ring-fenced resource for both the staff taking on these roles (e.g. Single Points of Contact, SPOCs) and the coordination and activities of the partnership. We recommend budget be allocated to statutory agencies with a duty to identify, report and respond to modern slavery, specifically for these purposes.

39 Justice and Care (2020), p.65.



4. Training, Expertise and Reporting

It is widely accepted that training on relevant topics is essential to ensure that organisations have the skills and knowledge to carry out their roles safely and effectively. As a safeguarding issue, this is highly important for any practitioners that may encounter modern slavery. Due to the nature of abuse, modern slavery necessitates an appropriate response from practitioners to ensure everyone's right to live without fear of abuse and neglect is upheld, along with protection of basic human rights. If practitioners are unable to identify and report modern slavery cases, victims will not be identified, and perpetrators will be left undeterred in their efforts to exploit people in inhumane conditions for profit.

4.1 National Landscape

Prior to the MSA, modern slavery was not a term widely used across the UK, evidenced by the lack of data prior to 2015.⁴⁰ With the passing of the MSA, a consolidation of slavery and trafficking related crimes was outlined, and a statutory responsibility was placed on specific organisations to identify and report potential victims through a government system. In line with the new expectations, NHS England and the Metropolitan Police commissioned ADASS⁴¹ in collaboration with the International Organisation for Migration (IOM) and Stop the Traffik (STT) created and delivered *Human Trafficking and Modern Slavery Multi-Agency Awareness Raising Training* to local authorities, police officers and NHS providers in London, with the expectation that those trained would then go onto deliver their own training sessions. Some of those who attended had some experience of the issue, but the majority did not. This is reflective of a similar picture in Hertfordshire even now. Out of 25 First Responder leads identified in the adult pathway pilot⁴², 76% (n=19) had never submitted an NRM referral or Duty to Notify.⁴³ Attempts

40 Office for National Statistics (2020) Modern slavery in the UK: March 2020:

<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/modernslaveryintheuk/march2020>.

41 ADASS is the Association of Directors of Adult Social Services in England whose aim is to promote higher standards of social care services, influence policies & decision-makers to transform the lives of people needing and providing care.

42 See Box 3, Case Study A for more information about the pathway and pilot.

43 Findings from HSAB Adult Victim Pathways Pilot: Baseline Survey (First Responders). (Total: 25 Responses).

were also made to work with the Government to embed this model nationwide, however, funding commitments were not made and as a result, it fell through.⁴⁴

The lack of knowledge of training attendees is reflective of the national picture more broadly, with some local stakeholders having received some input or training on human trafficking or exploitation, likely in line with safeguarding training, but in general, overall knowledge of modern slavery at the local level was pretty limited. It is therefore important to recognise that upon the passing of the MSA, there was no national training programme in place and no training requirements (statutory, mandatory or optional) established by the UK Government to upskill practitioner knowledge aside from some law enforcement agencies (e.g. the College of Policing Authorised Professional Practice on Modern Slavery, introduced in January 2016).

“If those organisations on the ground do not have the right knowledge and tools to identify and report victims, then victims will remain hidden and in their exploitative situation.”

Anecdotally, there is evidence that training has led to higher NRM referrals, including by police and local authorities,⁴⁵ and an increase in police investigations and offences recorded.⁴⁶ Taking Hertfordshire as an example: only 11% (n=4) of local stakeholders had received modern slavery training or identified/ reported a modern slavery victim prior to 2016. However, from 2016 onwards, 78% (n=35) of local stakeholders received modern slavery training and 47% (n=21) had identified or reported a modern slavery victim.⁴⁷

However, numerous reports highlight that across partnerships, there is still a ‘worrying lack of awareness in some areas and amongst some agencies’ due to the lack of mandatory or statutory training at the local level.⁴⁸ This trend is prevalent in both the statutory and non-statutory sectors. With no additional government resource to support NRM First Responder training, many are still not aware of the ‘duty to notify’ outlined in Section 52 of the MSA.⁴⁹ On a national scale, charities that are very likely coming into contact with victims on the frontline are either not aware of modern slavery or, if they are aware, still struggle to understand the pathway for identification and referral of victims for support.⁵⁰ This is supported by Project TILI⁵¹ training evaluations that identified that some organisations were not even aware that support for survivors is available from the Government and had not heard of the NRM.⁵²

4.2 Hertfordshire Perspective

It should not be surprising that frontline training on modern slavery (context, indicators and reporting) features in the activities of many anti-slavery partnerships (just under 60%)⁵³ and Hertfordshire is no different. Given that the majority of training resources produced were targeted at police forces, like many other partnerships, the stakeholder with the most knowledge on the issue initially was from the local police force. In response to numerous training requests, Hertfordshire Constabulary, and more specifically, specialist officers within Operation Tropic, the modern slavery led unit within the force, agreed to take on responsibility for training within and outside of the force. Over 1000 local Hertfordshire professionals were trained by the unit through the HMSP across local government, central government, the NHS and Hertfordshire Constabulary from February 2017 to June 2021 (over 200 training sessions delivered).

44 Notes from meeting with stakeholder (2019).

45 Justice and Care (2020), p.23

46 Ibid, p.24.

47 Findings taken from a HMSP Evaluation Surveys (General and SPOCs) undertaken in 2021. (Total: 45 responses).

48 Justice and Care (2020), p.22.

49 Ibid, p.52 and p.56.

50 Ibid, p.26.

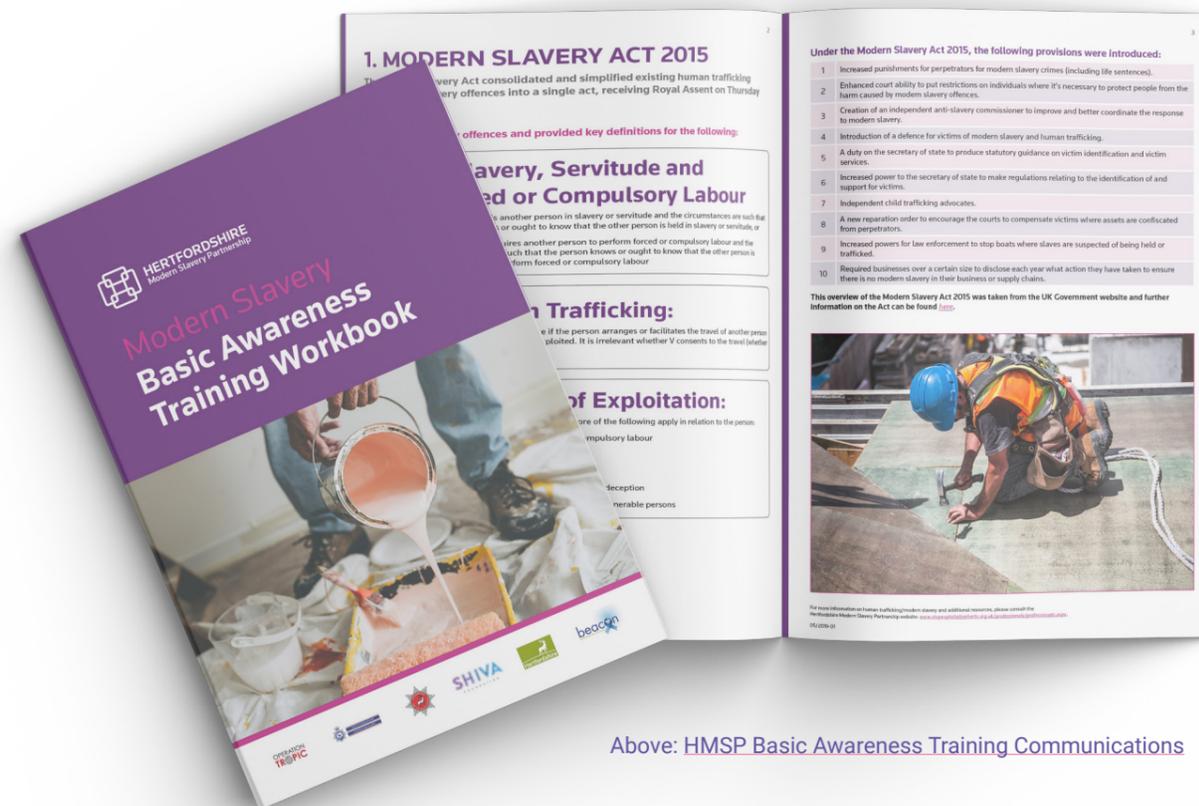
51 Project TILI (Train, Identify, Learn – Intelligence) was funded by the Tampon Tax Fund and one of the four sub-projects within TILI was the development of a database of cases of modern slavery across England, Wales and Northern Ireland. 32 partner organisations identified 172 potential victims of modern slavery who were homeless or vulnerably housed in the database.

52 Crisis (as part of Project TILI) (2021) *No way out and no way home: Modern slavery and homelessness in England, Wales and Northern Ireland*, p.46: <https://wa-externalwebsite-umbraco-prod-master.azurewebsites.net/media/245122/no-way-out-and-no-way-home-final-designed.pdf>.

53 University of Nottingham Rights Lab (2019), p.19.

With support from the coordinator and police, a number of organisations (e.g. clinical commissioning groups, citizen’s advice bureaus and the Environment Agency – see Annex 4) also embedded modern slavery training within the fabric of their organisations in the form of e-learning or face to face training. 33% (n=15) of individual stakeholders confirmed they had attended modern slavery training within 2021 and 44% (n=20) highlighted that their organisation has an optional or compulsory modern slavery e-learning module.⁵⁴ The impact of this training can also be clearly seen in the increase in the number of third-party referrals made to Operation Tropic and the number of modern slavery offences recorded from 2016 to 2018. From April 2016-March 2017, only 4 third-party referrals were recorded, and this increased to 134 from April 2017 – March 2018. From April 2017 to March 2018, 17 modern slavery offences were recorded, increasing to 55 in April 2018 to March 2019. In addition, HMSP evaluations of 188 training session attendees demonstrate the increase in knowledge of modern slavery post the training session. In fact, 85% of attendees recorded a knowledge level of 8 or above after the training.

“If practitioners are unable to identify and report modern slavery cases, victims will not be identified, and perpetrators will be left undeterred in their efforts to exploit people in inhumane conditions for profit.”



Above: HMSP Basic Awareness Training Communications

Table A: Knowledge HMSP Basic Awareness Training: Modern Slavery Knowledge Levels (Scale 1-10)

KNOWLEDGE	Pre-Workshop	Post Workshop
Knowledge Levels	0-10	5-10
Change:	-	+ 5

The training provider, whether it was the police or coordinator, was agreed informally and therefore vulnerable to changing circumstances (e.g. the police changing staff and the coordinator leaving post). Yet requests for training by untrained organisations and those in need of a refresher continue to be made. A recent report on gaps in adult victims’ support provision by a task and finish group, where all member organisations (statutory and non-statutory – health, local authority, charity, police) still pointed to a lack of knowledge among colleagues on the topic, which can also be further hindered by high staff turnover. If those organisations on the ground do not have the right knowledge and tools to identify and report victims, then victims will remain hidden and in their exploitative situation. At the end of the adult pathway pilot⁵⁵, the majority of First Responder and non-First Responder leads also identified the need for increased awareness and further training for themselves and their colleagues.



4.3 Recommendation

Mandatory modern slavery training should be introduced to ensure that public authorities are aware of their duties under the MSA. The training should be embedded within professional qualifications and inductions as appropriate. To address the significant gap in awareness and understanding of modern slavery on the frontline, local authority commissioning and assurance processes, including service-level agreements and contracts, must ensure that organisations and individuals who are delivering services for them, know how to spot signs of modern slavery and where to report them to.

The UK Government should allocate funding to a local multi-agency board-led train the trainer programme¹, which is drawn from a standardised nationally approved framework to ensure consistency across the UK. Knowledge can be kept updated through a champions’ network of specialists who can also support each other.

¹ In 2018, the HMSP trained 16 champions across local organisations, but as a one-off session with no subsequent sessions offered, only one champion ended up delivering any training to their own organisation.

⁵⁴ Findings taken from a HMSP Evaluation Surveys (General and SPOCs) undertaken in 2021. (Total: 45 responses).
⁵⁵ See Box 3, Case Study A for more information about the pathway and pilot.



5. Funding

The amount of funding and resource committed to an issue area directly affects the development, quality, and services related to that area. This is the same for Partnerships and the respective stakeholder organisations because it allows for the delivery of services and programme activities to progress the agenda and tackle the issue. Without funding, people cannot be recruited to undertake activities or purchase items that support a partnership with its goals; the risk is that addressing modern slavery will seem like an add on and won't be given the time and capacity required to effectively deliver it in any sustainable way.

5.1 National Landscape

National funding to date has principally focused on enforcement-related responses to modern slavery. Outside of specific pilots, partnerships have received no dedicated funding from the UK Government to facilitate partnership activity. Most partnerships either fund their work through the mainstream budgets of key partners and in-kind contributions or applications to eligible grants.⁵⁶ There is very little dedicated funding to promote joint planning of local partnership activity. The outcome of this is that very few partnership stakeholders are working together to joint-commission appropriate services for their area. This trend was identified in 2017⁵⁷ and again in 2019.⁵⁸

The 2019 partnerships report also identified that where dedicated funding to the Partnership does exist, such as from the Police and Crime Commissioner, it usually covers only 'secretariat and hosting costs', leaving 'a significant funding gap that hinders service delivery and other activities'.⁵⁹ In some areas, member organisations have worked together to apply for specific funding to target their local needs (e.g. West Midlands Anti-Slavery Network's SafePlace Project funded by the National Lottery Fund),⁶⁰ but this ad-hoc approach does not provide the stability needed for consistent, long-term action.

56 University of Nottingham Rights Lab (2019), p.24.

57 University of Nottingham Rights Lab and IASC Office (2017), p.16.

58 University of Nottingham Rights Lab (2019), p.19.

59 Ibid, p.24.

60 The SafePlace Project refers to a project providing pre-NRM supported accommodation for adult male survivors of human trafficking and modern slavery in the West Midlands.

Access to this funding is also highly competitive. Given the lack of knowledge on modern slavery and complexities around identification and reporting, which ultimately undermine the ability to demonstrate need, it is extremely difficult to access such resource. This is an area that was identified by partnerships as something that the government needed to change by dedicating resource to allow for sufficient progress to be made.⁶¹

“The amount of funding and resource committed to an issue area directly affects the development, quality, and services related to that area.”

Furthermore, concerns by practitioners that work is 'vulnerable to local funding cuts' and coordination of activity is limited were identified back in 2017,⁶² and again in 2019.⁶³ Partnerships have continued to lament on what can be achieved whilst frontline services continue to be under pressure from spending cuts and when funding remains ad hoc.⁶⁴ These issues have been exacerbated by COVID-19 despite an increase in funding for COVID-19 related activities. One survey respondent from the police commented in the 2017 report: 'You can't say you are here for modern slavery victims if you won't put finance in place'.⁶⁵ A number of survey respondents in the same report highlighted the need for dedicated well-resourced teams within leading statutory stakeholder organisations that can improve their organisation's response to the issue.⁶⁶ This is also essential for anti-slavery partnerships to be most effective in meetings cross-agency goals.

5.2 Hertfordshire Perspective

Partnership Funding: As with other anti-slavery partnerships, the majority of funding allocated to anti-slavery activities in Hertfordshire has been in kind through staff taking this on voluntarily in addition to their substantive role. Hertfordshire has been fortunate to receive financial support from the Hertfordshire PCC, amounting to £21,000 over 3 years to undertake relevant partnership activities and also funding towards the coordinator role from 2019 to 2021. However, no other statutory stakeholder organisation has contributed any significant funding, except a minimal amount towards a 2017 public awareness campaign. In fact, even though Shiva Foundation donates the coordinator, providing capacity, it has also had to fill additional funding and capacity gaps, such as design work and social media. After five years as coordinator, Shiva Foundation, an external and independent charity, has ended its role, noting the need for this role to be embedded at statutory level. As of October 2021, funding toward this role was unfortunately still not forthcoming.

Statutory Organisation Funding: The local police force has had a dedicated modern slavery unit since 2016 which has had an impact, particularly on establishing the HMSF, increasing awareness and reporting. But this unit is under-resourced, which impacts on the unit's ability to effectively investigate and prosecute modern slavery crimes. In fact, there have only been two successful modern slavery prosecutions in the county since 2017, both of which took place in 2021. It is also no coincidence that these prosecutions were linked to county lines exploitation, which is an area resourced by a larger focused team. Larger teams will likely have greater outcomes than a smaller, lesser resourced team.

Hertfordshire local authorities have been hindered by the lack of ringfenced national funding allocation to safeguard and support both adult and child modern slavery victims. For example, the Independent Child Trafficking Guardians service,⁶⁷ which is a Government-funded programme, has been rolled out in Wales and a selected number of areas in England. Despite its proximity to London and the high incidence of county lines exploitation and gang related exploitation that occurs as a result, Hertfordshire has not benefited from this funded service. As a result, the local response is provided within existing budget requirements and Hertfordshire practitioners are unable to benefit from the additional casework

61 University of Nottingham Rights Lab and IASC Office (2017), p.14.

62 Ibid, p.19

63 University of Nottingham Rights Lab (2019), p.24.

64 Ibid, p.19.

65 University of Nottingham Rights Lab and IASC Office (2017), p.25.

66 Ibid.

67 Run by Barnardo's, the ICTG Service provides direct, specialist practical and emotional support to trafficked children, facilitating their interactions with social care services, police and immigration in Wales/Cymru and a select number of regions in England. They also operate a 24/7 helpline, which is open for advice to all practitioners across the UK. For more information, see [Barnardo's website](#).



Above: [HMSP Indicator Checklist](#)

provision to further support interventions in NRM referred child modern slavery cases. In terms of adults, the funding landscape for adult victims in Hertfordshire is lacking and as a result there are no funded modern slavery posts within county council.

‘You can’t say you are here for modern slavery victims if you won’t put finance in place’

Ultimately, progress in this arena will continue to be limited whilst frontline services face ongoing pressure from spending cuts and funding remains ad-hoc. Measuring and monitoring impact will always be regarded as a time consuming and expensive add on, undermining organisation ability to tackle an inherently complex and hidden crime.



5.3 Recommendation

Local partnership coordinators should be funded sustainably through a national framework to develop anti-slavery work and consistently monitor performance. Alongside this, anti-slavery partnership activities should be able to access funding through a collaborative local innovation fund (which provides funding for at least five years to ensure sustainability). Statutory organisations should also be provided with ring-fenced funding to meet their role and responsibilities in relation to the anti-slavery agenda.¹

¹ University of Nottingham Rights Lab (2019), pp.34-35.



6. Coordination

Supported by membership of the [National Network Coordinators Forum \(NNCF\)](#),⁶⁸ coordinators are key to multi-agency partnerships, filling an important role in keeping local activities in line with and grounded in national best practice and guidance. They also ensure projects run smoothly, on time and to budget. Duties typically include planning certain parts of the project, monitoring its progress, coordinating meetings and supporting partnership members.

Having a central point of contact and support is vital for maintaining momentum among stakeholders to continue to focus on modern slavery. Coordinators are linked in with national modern slavery work, providing the most up-to-date information on changes in policy, but also funding opportunities to support local stakeholders to progress the agenda. They can also act as a specialist on the topic across all issue areas (e.g. victim support, policy, criminal trends, supply chains, etc).

6.1 National Landscape

Comparing partnerships with and without coordinators, the 2019 partnership report highlights that there is a notable increase in the activities of partnerships supported by coordinators where they can put into practice the action plans and activities that are discussed during partnership meetings *and* have a budget with which to fund their delivery (see Section 5 on funding for further information). Having a long-term coordinator also enables the possibility of engaging, developing, delivering, evaluating and refining a programme of activities that can start to build that resilience. In 2017, most UK anti-slavery partnerships were chaired (35%) and coordinated (about 30%) by the police and working within force boundaries. This reflects the law enforcement responsibilities of the police around this agenda. After police, NGOs (about 10%) and local authorities (about 10%) from top tier authorities are then the most likely organisations to act as coordinators.⁶⁹

Coordination has become more even more diverse (e.g. there has been an increase in partnership coordination being undertaken by local authorities – about 20%), but most partnerships are still

⁶⁸ The aim of the NNCF is to provide a forum in which to promote inter-regional cooperation and sharing of best practice between regional partnerships across the UK. The group is co-chaired and coordinated by the Human Trafficking Foundation and Robin Brierley, Chair of the West-Midlands Anti-Slavery Network.

⁶⁹ University of Nottingham Rights Lab and IASC Office (2017), pp.15-16.

coordinated by the police (about 25%).⁷⁰ This can be problematic from a victim support perspective, particularly in areas where specialist victim liaison officers are not embedded within the force, leading to the partnership's focus becoming siloed and criminal justice-centric. The Hestia super complaint made against police forces in England and Wales in relation to its response to modern slavery victims, further demonstrates why modern slavery should be a shared multi-agency issue, rather than one led almost entirely by the police. The report made clear that the lack of effective support for victims, along with experiences of poor treatment, has deterred victims from engaging with police investigations and accessing the necessary help.⁷¹

BOX 4: Coordinating as an NGO

Advantages:

- Can carry out role with a high level of independence.
- Well informed by national best practice and changes in policy.
- Can provide stakeholders with a different and sometimes challenging perspective to the status quo.
- Able to undertake actions in a timely fashion.

Disadvantages:

- Limited by difficulties in accessing information from a large number of stakeholders.
- Limited by a lack of authority to hold stakeholder organisations to account, particularly senior leaders.
- Can end up filling in for additional capacity in lieu of organisations taking necessary responsibility for fulfilling relevant actions.

6.2 Hertfordshire Perspective

In Hertfordshire, the partnership has been coordinated by an NGO since 2017. Shiva Foundation initially offered limited administrative support to the partnership as it was being set up. As the HMSP became more established, the coordinating role grew. It evolved into a part-time role then subsequently was a full-time role from February 2019 to June 2021. Shiva Foundation filling this role came out of capacity/funding limitations of other key stakeholders and an acknowledgement of the usefulness of having a coordinator that sits independently of key organisations. It should be noted that this was not the original intention but borne out of necessity. Unsurprisingly, the coordinator role has been key to meeting the objectives of the partnership action plan.

Facilitating communication: As the central point of contact for modern slavery and the partnership in Hertfordshire, the coordinator role was essential to keeping practitioners up to date with relevant information and updated national guidance, as well as consolidating national/local information and data on modern slavery. With the most thorough understanding of the local landscape, a key part has been bringing together practitioners to reflect on and address specific areas. For example, the successful running of the adult modern slavery task and finish group relied on a varied membership to consider how best to improve adult support provision in Hertfordshire.

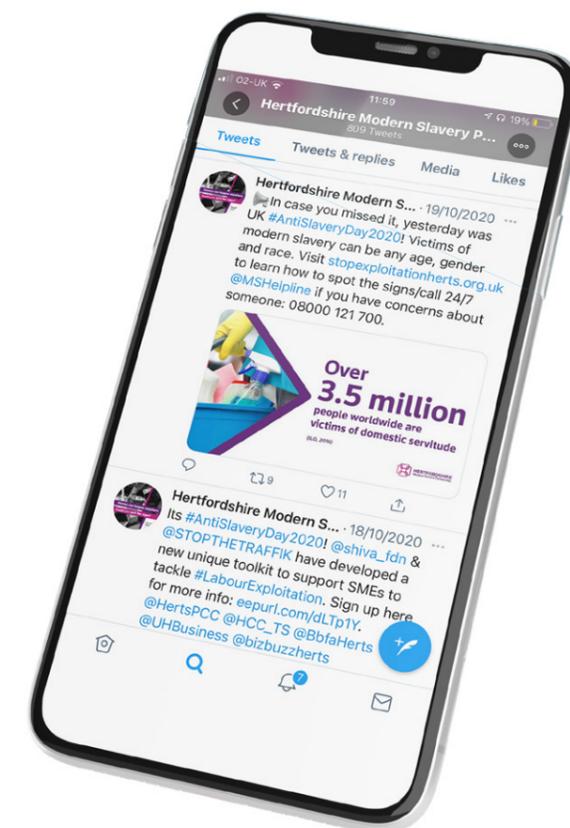
⁷⁰ Ibid.

⁷¹ HMICFRS, the College of Policing and the Independent Office for Police Conduct (IOPC) (2021) The Hidden Victims: Report on Hestia's super-complaint on the police response to victims of modern slavery, pp.6-7: <https://www.gov.uk/government/publications/police-response-to-victims-of-modern-slavery>. See references for a link to the 2019 Hestia report.

“...coordinators are key to multi-agency partnerships, filling an important role in keeping local activities in line with and grounded in national best practice and guidance.”

Increasing capacity and expertise: The coordinator role has been important for providing capacity in a climate where resource is scarce across many key organisations (see Section 5 on funding for further information and Box 4 for examples of activities undertaken). As a source of expertise, the majority of the resources produced in line with the HMSP action plan could not have been produced without someone taking ownership. In the last year, there has been a greater emphasis on victim support, particularly within the adult pathway pilot⁷², and as a result of this, frontline practitioners have sought guidance from the coordinator in terms of what to do in relation to specific, live cases.

Furthermore, reviewing documents, creating sector-specific modern slavery content and providing feedback on internal organisation policies and processes has been a useful activity. The local authority progress review documents⁷³ have incentivised practitioners to improve organisation processes and embed modern slavery within policies. For example, one local authority added modern slavery content to its recruitment policy for the first time, whilst another produced a draft supplier code of conduct featuring modern slavery. Requests for review of policies and procedures were received from a range of member organisations, including NHS trusts, police, local authorities, charities and law enforcement agencies. In line with policy consultations, content to be embedded within licensing policies was created and added to a number of local authority policies following consultation (e.g. [Hertsmere Borough Council](#), [Dacorum Borough Council](#) and [East Hertfordshire District Council](#)).



[HMSP communications campaign awareness across social media](#)

Supporting Example: When the police unit unfortunately had to pull back from delivering training as a result of capacity issues, this was despite rising requests from other organisations to deliver training to their staff. The coordinator responded, first, by adapting the police training package for use across all organisations.

Second, as part of the partnership annual update at the joint safeguarding boards meeting (Hertfordshire Safeguarding Adult Board and Hertfordshire Safeguarding Children's Partnership), the coordinator requested and received approval by the boards to embed modern slavery training within the board's training offer. Third, alongside their other coordinator responsibilities, they took over from the police as the sole trainer for delivery of training to external partners until June 2021. From January 2019 to June 2021, the coordinator delivered a total of 49 training sessions, along with a further 46 inputs/updates.

⁷² See Box 3, Case Study A for more information on the pathway and pilot.

⁷³ These review documents consider progress by key local authority departments and outline recommendations for improvement, so that approaches to tackling modern slavery are absorbed into the core of each local authority.

Providing consistency: In a sector where turnover is high, particularly in the police, the coordinator role has been vital for providing consistency in the HMSP's approach and ensuring that momentum has been maintained around meeting the six strategic priorities outlined in the strategy and action plans. This need for consistency was no more evident than in the first quarter of 2019 where seven out of the 10-member steering group changed, with some of these members changing multiple times within six months. It is also worth noting that staff changeover usually led to greater responsibility on the coordinator to undertake dropped activities (see *Section 3 on Capacity and Engagement for further information*).

BOX 5: Achievements as Coordinator – example activities

- Increased Partnership membership from 40 to 152 members between 2017 and 2021, including advising them on embedding suitable processes and policies.
- Produced 30 materials (resources/guidance/publicity materials/training/reports/policy content). Examples include a homeless flyer, practice guidance for practitioners, survivor handbook and training facilitators handbook.
- Produced personalised progress review documents for six local authorities and a template document for the others.
- Embedded county-specific identification and reporting pathways for adult and child victims.
- Delivered 120 training sessions and organised nine public awareness campaigns.
- Oversaw the development of and managed the HMSP website and Twitter account.
- Organised a stakeholder event in Parliament, attended by 75 national and local stakeholders and local MPs.
- Compiled and edited the 190-page National Enforcement Powers Guide (endorsed by the UK Home Office).
- Homeless-Modern Slavery Campaign (December 2019) production including a comms pack with messaging and images for social media, flyers, posters translated into 6 foreign languages, and a workshop for local housing and homeless organisations, delivered by The Passage.



6.3 Recommendation

The coordinator role is pivotal to driving anti-slavery work forward in the various regions within the country. Not only must this role be funded in each partnership, but where this role sits should be consistent across the UK. In addition, the Government should be clear about the responsibilities of the coordinator and these responsibilities should be drawn across a multitude of overlapping areas. A cross-sectoral remit is extremely important for ensuring that the focus of this role is not confined to the narrow limitations of a single statutory agency's core activities (e.g. police). Reinforced by statutory requirements for different agencies to undertake specific partnership activities, partnership accountability should also be the responsibility of the coordinator (see *Section 2.3 on accountability and evaluation*). Ideally the partnership and linked individual organisation activities would all be reported on and analysed nationally.

“The coordinator role is pivotal to driving anti-slavery work forward in the various regions within the country.”



7. Consistent, Clear and Up-To-Date Messaging

Clarity improves connection and engagement across partnerships because it increases trust and transparency. Clarity exposes purpose by unveiling expectations and tells people exactly what is wanted from the outset. Clear and consistent messaging is essential for anti-slavery partnerships because it ensures that all stakeholders are fully aligned, and that they progress in the same direction, telling the same story and creating consistent touch points for other stakeholders, clients and residents.

7.1 National Landscape

All partnerships tend to have raising awareness as an aim or priority.⁷⁴ This makes sense as without the public and practitioners knowing what modern slavery is, then it is incredibly difficult to find victims or identify perpetrators. People need to understand what it is you are trying to communicate, what the expectations are on them and what they should do specifically. If this process is confusing, then it is unlikely that any incidents will be reported.

A number of partnerships have branding and clear messaging, which includes a logo, website or content to be utilised by partners. Examples of anti-slavery partnerships with websites include the [South West Anti-Slavery Partnership](#), [Norfolk Anti-Slavery Partnership](#), [Humber Modern Slavery Partnership](#), [Hampshire Isle of White and Surrey](#), [Sussex](#) and the [West Midlands Anti-Slavery Network](#). This messaging is also reinforced by partnership public awareness campaigns. Examples of public awareness campaigns undertaken by anti-slavery partnerships include the Hampshire Anti-Slavery Partnership's year-long exhibition: '[The real faces of modern slavery: unmasking the truth](#)'.

⁷⁴ University of Nottingham Rights Lab (2019), p.26

7.2 Hertfordshire Perspective

Hertfordshire has sought to embed consistent, clear and up-to-date messaging both internally and externally. One element that was agreed early on was that messaging, in terms of consistency and intent, should be steered through the partnership, and therefore it was important to link in with the county communications group to facilitate this. Three comms representatives from key stakeholder organisations (police, PCC's office and HCC) were nominated to support the formulation and promotion of agreed messaging. The activities undertaken to achieve this were outlined in an agreed policy and action plan.

However, with no clear mandate or budget around communications, once organisation priorities changed or representatives moved to new roles, attention waned and the coordinator had to fill the gaps. Nevertheless, the following elements were key to embedding consistent, clear and up-to-date messaging in Hertfordshire:

- **Key Definitions:** To provide clarity and content on what modern slavery is and what the purpose of the anti-slavery partnership was. This messaging then provided the basis for all communications on modern slavery and the partnership going forward.
- **Branding:** A logo was designed for the partnership, along with agreement on colours and a font, which could be used on all partnership materials and communications. This ensured that partnership materials were instantly recognisable.
- **Internal Communications:** Local stakeholders were kept updated through newsletters, emails, partnership meetings, intranets, articles and guidance, ensuring consistency across organisations.
- **External Communications:** Partnership messages were communicated externally through public awareness campaigns,⁷⁵ [an external partnership website](#), press releases, media engagement, social media platforms, events, and guidance documents to raise knowledge levels in the county.



7.3 Recommendation

Anti-slavery partnerships should be required to allocate resource locally to producing consistent, clear and up-to-date messaging on modern slavery, which is also linked with national guidelines, legislation and other areas of best practice. This ensures that increased awareness of the issue is based on factual evidence, reducing the possibility of misinformation being shared.

⁷⁵ 76% (n=34) of stakeholders used at least one of the HMSP publicity materials. Findings taken from a HMSP Evaluation Surveys (General and SPOCs) undertaken in 2021. (Total: 45 responses))



8. Data Recording: National and Local Datasets

Recording and amalgamating data from a wide range of sources is an integral part of tackling modern slavery, providing evidence for the needs of anti-slavery partnerships and their stakeholder organisations, whilst supporting accountability. Data helps to increase understanding of the overall picture and to improve related services and programs. Strong data is central to pursuing the most effective response. This becomes even more important for a hidden crime like modern slavery, which is inherently difficult to detect.

8.1 National Landscape

National Datasets: The Office for National Statistics highlighted in March 2010 that there is currently 'no definitive source of data or suitable method available to accurately quantify the number of victims of modern slavery in the UK'. The Office also identified that even though evidence suggests that 'there have been improvements in identification since 2015; [...] many cases remain hidden and unreported'.⁷⁶ This is further supported by the fact that most national and local modern slavery data recorded is taken from criminal justice and law enforcement data (i.e. mainly UK Home Office (NRM submissions), Crown Prosecution Service and police recorded crimes).

The reliance on these datasets is highly problematic due to their limitations. For example, national evidence increasingly demonstrates that most adult victims do not consent to being referred into the NRM and do not wish to engage with the police. This trend has also been identified in Hertfordshire. The lack of alternative sources of data (e.g. health, local authority, schools, NGO (non-NRM First Responder, housing, social security) in creating a fuller picture of modern slavery prevalence further undermines a true understanding of the crime. Taking local housing data as an example, modern slavery wasn't previously something that had to be recorded within H-CLIC⁷⁷ data.⁷⁸ Data hasn't been recorded, nor

⁷⁶ Office for National Statistics (2020).

⁷⁷ H-CLIC refers to Homelessness Case Level Collection made up core questions to be used in the monitoring of statutory homelessness by local authorities in England following commencement of the Homelessness Reduction Act 2017.

⁷⁸ Notes taken from Homelessness-Modern Slavery Task and Finish Group meeting.

has there been an incentive to request it from the 1,408 social housing providers registered with the Regulator of Social Housing the Ministry of Housing, Communities and Department for Health.⁷⁹

The importance of data recording across all organisations was demonstrated by the change in police response after the HMICFRS⁸⁰ inspection in 2017, which identified significant under-reporting. Since then, there has been a national increase in recorded modern slavery offences year on year and in turn, more live investigations (Nov 2016: 188 vs Dec 2019: 1,821).⁸¹ This trend can be replicated with other organisations likely to encounter a victim.

Partnership Stakeholder Organisation Datasets: There is no nationally mandated way of recording modern slavery cases across all organisations outside of the NRM. As a result, modern slavery has not been embedded as a recording category in hundreds of organisations that are likely to encounter victims or perpetrators. This negatively impacts national understanding of the problem and the UK's subsequent response. There are pockets of data recording best practice by partnerships that are trying to rectify this issue but this varies considerably between each area. [Thames Valley Partnership](#), for example, has had a data dashboard in place since 2018, which features police figures alongside figures from the aligned victim support service funded by the local PCC, [The Willow Project](#) (now the Adult Specialist Support Service since 2020). This dashboard has been used to inform the priorities of the partnership, as well as an evidence base to justify and encourage wider partnership involvement.⁸² In 2019, less than 5% of partnerships had data dashboards.⁸³

8.2 Hertfordshire Perspective

Like other areas, the main source of current modern slavery data for Hertfordshire is police recorded offences and NRM referrals. Hertfordshire has also seen an upward trend in modern slavery offences being recorded – an increase of around a third year-on-year since 2016. The introduction of a monthly police data dashboard in 2019, which is shared internally and externally, has also been essential to providing some consistency in statistics and offering an opportunity for greater scrutiny of the issue across the county.

Local Under-Reporting: As with the national picture, over-reliance on NRM and local police data is an ongoing concern, particularly given similar gaps in data recording by police officers. For example, despite of the prominence of cuckooing in Hertfordshire which is often tied with county lines activity, only 2 out of 62 cases were also recorded as modern slavery offences.⁸⁴ Justice and Care used National Data Analytic Solutions (NDAS)⁸⁵ to demonstrate that police officers in the West Midlands are failing to identify modern slavery and are therefore not adding modern slavery flags to likely cases.⁸⁶ A trend which is likely to be replicated across the UK in other force areas and organisations.

In other instances, modern slavery cases have been identified but are then not being properly reported. Why? Either these cases do not meet adult social care thresholds or the NRM process is not being followed and therefore these cases are not being captured appropriately. This trend is supported by Project TILI findings. Out of 44 different data sources, only 20 sources submitted data, with 55% coming from the three organisations who already had good capabilities for identifying survivors.⁸⁷ Through the Hertfordshire adult pathway pilot⁸⁸, it has also become clear that although non-NRM First Responders have begun to better record possible modern slavery cases internally, this does not translate into these cases being reported to the appropriate channels and recorded at a county or national level (NRM or

⁷⁹ Data accurate as of August 2021.

⁸⁰ HMICFRS refers to Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services, which has statutory responsibility for the inspection of the police forces and the fire and rescue services.

⁸¹ Justice and Care, (2020) p.224

⁸² Information taken from notes with former Thames Valley Partnership stakeholder.

⁸³ University of Nottingham Rights Lab (2019), p.22.

⁸⁴ Hertfordshire County Community Safety Unit (CCSU) and Public Health Evidence and Intelligence Unit (2020) 'Cuckooing' and Drug Supply Exploitation Intelligence Briefing (Restricted), p.18.

⁸⁵ National Data Analytic Solutions (NDAS) is a partnership of nine law enforcement agencies. It uses data analytics to help build better intelligence and insight from the mass of police data.

⁸⁶ Justice and Care (2020), pp.20-21.

⁸⁷ Crisis (as part of Project TILI) (2021), p.14.

⁸⁸ See Box 3, Case Study A for more information on the pathway and pilot.

police), further reinforced by victim unwillingness to engage with the police. Two out of four non-First Responder organisations that submitted data on adult clients during the pilot did not confirm their NRM status as they had not thought to verify this.

BOX 6: Practical Learnings on the Ground (Barriers to Accessing NRM Provision)

A multi-agency process for safeguarding and support can only truly intervene to support victims if there are specific local services for victims that are properly embedded within the pre-existing local infrastructure. This links to inherent issues with the NRM process which in some areas sits separate to the local support and safeguarding infrastructure and doesn't meet all the needs of the victim. This is certainly the case for Hertfordshire. Time and time again, evidence demonstrates that over half of adults do not wish to consent to the NRM and it is no wonder, given its complexity. Hertfordshire organisations have and continue to be left in the precarious position of having to support a vulnerable client without the necessary resources. The result is that the immediate, short-term and long-term needs of victims are not being met.

CASE STUDY: Classified as a Southeast region, Hertfordshire is served by Migrant Help as the NRM outreach provider. However, Migrant Help's closest office is in Stratford. Hertfordshire does not have NRM supported accommodation within the county. Without that or similar accommodation that practitioners know victims can access within the county, there is great uncertainty. Local authority can step in from a housing perspective, but this is not a statutory requirement, and is open to interpretation. Likewise, there are funding constraints and a shortage of housing stock available.

In a recent report on gaps in adult victim's support provision in Hertfordshire by a task and finish group, a plethora of service providers were identified, which could provide relevant support, yet none are NRM First Responders nor have they been commissioned to deliver services with modern slavery victims in mind. So the gap remains. Trauma informed approaches and best practice around victim engagement highlight the importance of consistency in support, time for reflection and non-repetition of stories, and yet, to even access the NRM a victim has to engage with three or four different organisations before finally accessing support.

With the lack of NRM safehouses and alternatives, Hertfordshire has developed an ad hoc approach to providing accommodation to victims. At the point of rescue in an emergency, the onus falls on the police officer to arrange accommodation and access to basic provisions with the local authority or a homeless charity, which is not always guaranteed. Out of hours, a police guard would have to be placed outside of a hotel or other similar accommodation for the first 24-48 hours. There is also no out-of-hours provision for victim support and therefore continuity of care isn't guaranteed. Victims are lacking that immediate support and reflection period, further undermine their chances of consenting to the NRM.

Overreliance on the NRM: National evidence demonstrates that the majority of adult victims do not consent to enter the NRM (see Box 6 for a Hertfordshire perspective on this) and yet measurements rely almost exclusively on this dataset. For example, over half of The Passage clients refused to enter the NRM from June 2018 to May 2020 but agreed to receive other services – either Passage welfare support, council housing, assisted voluntary return, reconnection or referral to specialist agencies.⁸⁹

Reporting for when an adult does not wish to enter the NRM is also low in Hertfordshire. From April 2017-June 2021, DTN referrals made up only 17% (n= 75 of 437 NRM referrals) (see Annex 2 for the full breakdown).⁹⁰ Out of 331 people on the Project TILI database recorded with modern slavery as indicator, nearly half refused to be referred to the NRM and of those that were referred in, NRM outcomes for at least 30% are unknown due to data recording failures.⁹¹ This demonstrates that even where NRM referrals are actually made, the majority of organisations (all non-NRM First Responders in this case), are also not keeping on top of required data recording. Reflecting on this evidence, there are clearly deep, harmful holes in NRM statistics, undermining local and national knowledge of the true prevalence of modern slavery in the UK.

Victim Journey Tracking Failings: The majority of Hertfordshire partnership member organisations acknowledged the need to increase the internal recording of modern slavery cases, to enable their understanding of this issue. Only 49% (n=22) of survey respondents confirmed that their organisation either had a modern slavery recording category or an exploitation recording category.⁹² Unfortunately, the low levels of internal recording has made it impossible to track the victim journey in its entirety. This has undermined opportunities for HMSP to improve outcomes for victims. There have been attempts by the coordinator, to diversify the source of data recorded and reported by stakeholder organisations. In recent years, data measures have been added by the Local Authority Children's Social Care team, Youth Offender Team and PCC-funded victim support service, Beacon. However, progress has been hindered by the reliance on voluntary commitment.



8.3 Recommendation

It's important for partnerships to work to build a more holistic picture of the problem with various datasets. This can be enhanced by the UK Government establishing a framework of specific data recording requirements for individual stakeholder organisations. Furthermore, a flag system for modern slavery indicators should be implemented across all government departments and statutory agencies and consistently provided. These local and national datasets could then be centrally amalgamated and analysed by a single entity.

⁸⁹ The Passage (2020), p.10.

⁹⁰ Hertfordshire CCSU and Public Health Evidence and Intelligence Unit (2018), p.42.

⁹¹ Crisis (as part of Project TILI) (2021), pp.7-8.

⁹² Findings taken from a HMSP Evaluation Surveys (General and SPOCs) undertaken in 2021. (Total: 45 responses).



9 Conclusion

The organic development of anti-slavery partnerships has initially been beneficial to allow for innovation in an area which is relatively new in the policy arena. However, given that it is six years since the MSA came into force, it is time to streamline them and to add Government support. Anti-slavery partnerships are responsible for much progress, but the lack of statutory direction and requirements is undermining a more effective evidence-based response. Where there are specifically funded posts for people (i.e. coordinators) to focus exclusively on the issue at hand, there is a lot more progress and momentum. The larger the teams or cohort of staff, the greater the ability to achieve.

For the country to identify the 90% of victims we aren't spotting according to estimates, to better support victims and to increase prosecutions, we must ensure that practitioners not only have the time and resource to invest in it, but also the expertise. The key areas we believe require national attention and guidance in order to streamline and standardise approaches for better outcomes include training to better equip those most likely to encounter victims, data collection in order to better understand the scale of the crime and the impact of our efforts, and a clear framework to monitor and evaluate the activities of local partnerships.

Organisations that have lots of competing priorities are not compelled to invest time and effort into this area. Taken against the reality of the lack of dedicated funding and capacity, the 2019 partnerships report concludes that stakeholders are reluctant to 'add additional layers of work or responsibility to already resource and time-stretched organisations'.⁹³ It is no wonder that partnership activity is inconsistent across the country. We all must invest in the future of anti-slavery partnerships so that the UK can be leading in its approach to tackle and prevent modern slavery. A proactive and effective response will depend on this renewed commitment and we look to UK Government to lead the way.

⁹³ University of aNottingham Rights Lab (2019), p.22.

ANNEX 1: List of HMSP materials (download for free)

HMSP Training Package

1. Tier 1: [Core Basic Modern Slavery Awareness Training PowerPoint Slides \(PDF\)](#), [Slide Notes \(PDF\)](#), [Facilitator's Handbook \(PDF\)](#), [Workbook \(PDF\)](#)
2. Tier 2: [Core Advanced Modern Slavery Awareness Training PowerPoint Slides](#)

HMSP Identification and Reporting Documents

- 1) [HMSP Referral Pathways \(Adult & Child\) & Guidance](#)
- 2) [NRM Offline Form \(Adult & Child\)](#)
- 3) [HMSP Indicator Checklist \(former information flyer\) \(for victims w/translations\)](#)
- 4) [HMSP NRM Support Booklet \(for victims w/translations\)](#)
- 5) [HMSP Survivor Handbook \(for victims w/translations\)](#)
- 6) [HMSP Legal Advice Guidance \(PDF - Jul 2020\)](#)

For information on how to use the documents within the remit of your role, please read the [summary pathways guidance document](#).

Hertfordshire Guidance:

HSAB Procedures (p.101): [Appendix on Modern Slavery and Human Trafficking](#) and [Practitioner Guidance](#)
HSCP Model Procedures - [Modern Slavery and Trafficking Chapter 5.3.2](#) and [Safeguarding Children 5.3.5](#)
HSCP Model Child Protection Policy for Voluntary, Community and Faith Groups (Updated [Modern Slavery and Trafficking](#))

HMSP Publicity Materials

[Business card – Hertfordshire Modern Slavery Partnership \(PDF, 593kb\)](#)
[Information flyer for the general public \(PDF, 930kb\)](#) and for [taxi drivers \(PDF, 933kb\)](#)
[Air Freshener and Matching Sticky Notes](#) (Jun 2019)
[Information flyer for homeless people \(A5\)](#) and for [people working with the homeless \(A5\)](#)
[Information flyer on cuckooing \(A5\)](#) and for [people who are affected by cuckooing](#)
[Posters - Labour Exploitation \(A3\) - A, B and C](#)

HMSP Resources and Guidance

[HMSP Progress Report 2016-2020 \(PDF - Mar 2020\)](#)
[Support and Access to Justice for Adult Victims of Modern Slavery](#) (Shiva Foundation) (PDF - Mar 2020)
[SME Toolkit](#) (Shiva Foundation and STOP THE TRAFFIK) (PDF - Mar 2020)
[Business guidance- Modern Slavery Statements](#) (PDF - Oct 2018)
[Modern Slavery Act - Summary](#) (Apr 2019)
[Spot the signs \(PDF, 87kb\)](#) (Apr 2019)

ANNEX 2: Hertfordshire reporting data

Table B: Number of National Referral Mechanism Referrals, including Duty to Notify,** broken down by financial years (2017-2020)

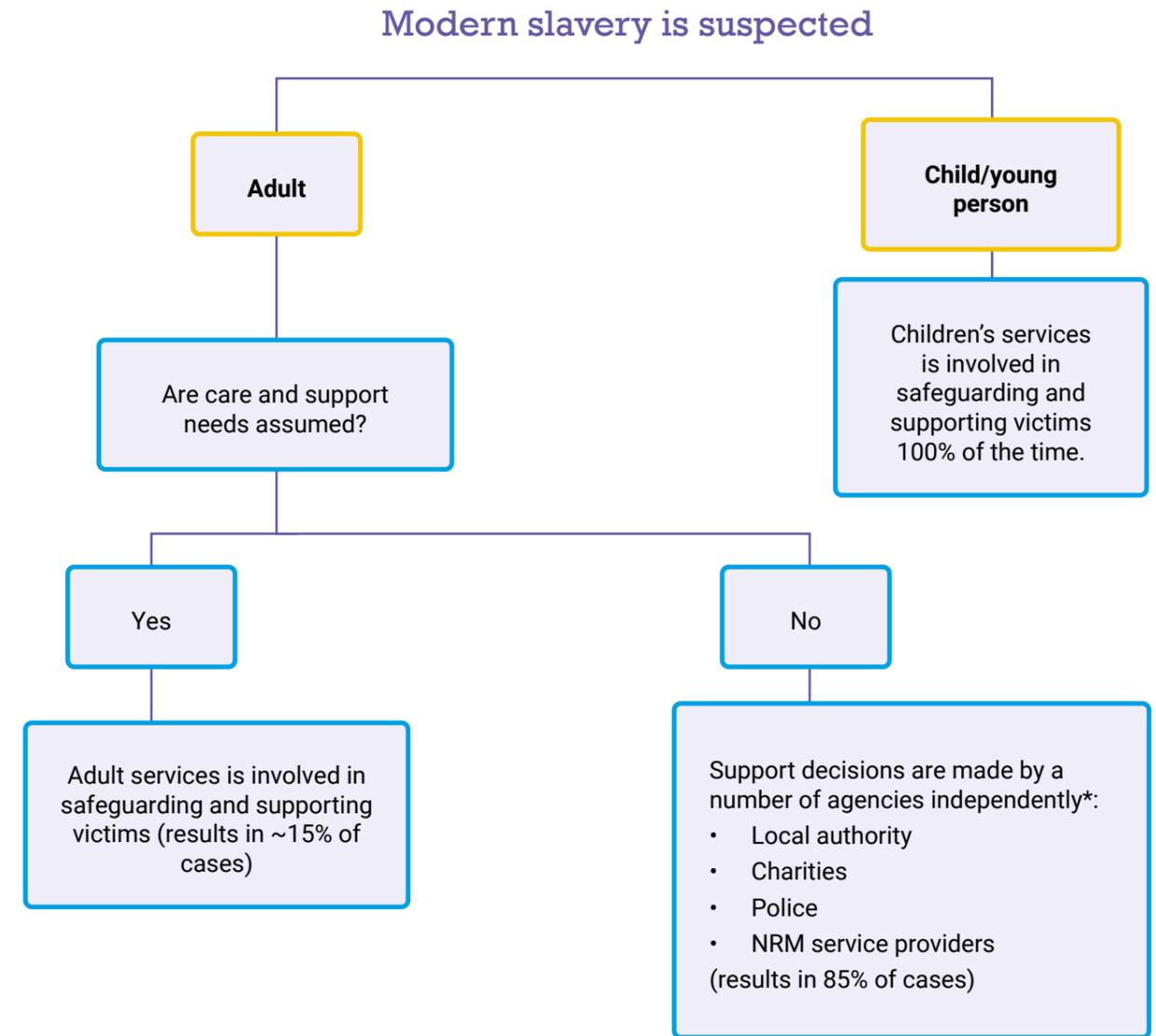
Financial Year	NRM Referrals	NRM (DTN) Referrals
Apr 2017 - Mar 2018	40	N/A
Apr 2018 - Mar 2019	91	21
Apr 2019 - Mar 2020	96	9
Apr 2020 - Dec 2020	84	9
Jan 2021 – Jun 2021	51	36
TOTAL:	362	75

** These are reports made of identified adult victims that do not consent to the NRM.

Table C: Number of Modern Slavery Referrals made to Hertfordshire County Council Adult Care Services (ACS), including the number that resulted in a safeguarding enquiry, broken down by financial years (2017-2020)

Financial Year	ACS Referrals	Safeguarding Enquiry
Apr 2017 - Mar 2018	9	3
Apr 2018 - Mar 2019	13	1
Apr 2019 - Mar 2020	10	1
Apr 2020 - Dec 2020	3	2
Jan 2021 – Jun 2021	5	3
TOTAL:	40	10

ANNEX 3: Victim support in practice



*This is further complicated by a variety of factors such as consent to NRM, willingness to engage with the police, and recourse to public funds.

ANNEX 4: Impact of Specialist Training for the local Environment Agency (EA)

1 - National Policy and Operations (Head Office):

- Head office has been tasked to produce a modern slavery statement for the EA (Resources provided by HMSP Coordinator).
- A draft modern slavery problem profile linked to the EA's remit has been produced.
- Hertfordshire Waste Crime Engagement Specialist has formed a national working group of colleagues who continue to update this workstream. A regional Deputy Director is sponsoring this working group. The regional director is able to promote the work and influence head office who are responsible for producing operational instructions for all EA staff.
- Discussions led by the lead local Hertfordshire Waste Crime Engagement Specialist with Hope for Justice around EA staff training. After consultation with management, the EA have developed an in house e-learning package for officers nationally, whilst consulting external stakeholders and following the Skills for Care Framework.
- Future ambition to produce EA data on number of modern slavery victims suspected/identified broken down by exploitation type, gender, age, and nationality.
- Internal e-learning module is due for release. This e-learning module will be added to staff learning plans and form part of new officer training.

Local Policy and Operations (Hertfordshire Office):

- A modern slavery subgroup, made up of operational officers, managers, and technical specialist staff, has been set up to support sharing of good practice and awareness raising.
- The modern slavery subgroup will run compulsory modern slavery training sessions with new Environment Officer intakes locally as and when needed.
- The new intelligence officer has inputted into the local modern slavery policy.
- Confirmed and revamped identification and reporting procedure for modern slavery, which is easier to follow and includes officers using the Modern Slavery Helpline app, run by Unseen.
- SPOCs have been appointed to provide additional modern slavery advice locally.
- Inclusion of a modern slavery input in all induction welcome days, which take place every 6 months, for all new staff in Hertfordshire and North London.
- In the process of producing modern slavery indicator flashcards for EA officers in Hertfordshire and North London to carry in their warrant card holders as visual reminders. These flashcards will be shared with head office once complete.
- The annual Waste Crime Partner Conference 2020 will include a modern slavery input for the first time (this was postponed).

Engagement with Specialist Modern Slavery Stakeholders (Initial introductions made by HMSP Coordinator):

- Meeting with Human Trafficking Foundation, resulting in introduction and future inclusion into the Pan London Modern Slavery Working Group.
- Contact made with the Newham London Borough Council modern slavery lead.

Off the back of modern slavery awareness training the following activities have taken place.⁹⁴

⁹⁴ Notes from correspondence with Environment Agency stakeholder (2020-2021).

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Local Modern Slavery Partnerships:

Recommendations
and Learnings
from Hertfordshire

