

Executive summary - Ending modern slavery in Hammersmith & Fulham

Our strategy for a coordinated community response, 2021 to 2026

In Hammersmith & Fulham, compassion is at the heart of everything we do, and we are determined to play our part in eradicating modern slavery - whether it's happening within our borough or elsewhere.

To make sure we're doing that, our inaugural modern slavery strategy has been co-produced by partners, including by survivors and residents.

You can read the full Modern Slavery Strategy in this document.

What you can do if you have concerns

Call the Modern Slavery helpline on 08000 121 700 for advice and support or to report suspicions.

For local services visit the [Angelou website](#).

In an emergency call 999.

Visit the Modern Slavery website to [learn the signs of modern slavery](#).

What is modern slavery?

Modern slavery is complex, but simply put, it describes a situation where someone is made to do something and another person gains from this. It is deception or coercion for the purpose of exploitation.

The purpose of exploitation may include:

- forced labour
- sexual exploitation
- domestic servitude
- criminal exploitation
- forced and sham marriages
- organ harvesting.

The local picture

Metropolitan Police Service data states that 172 modern slavery offences were submitted by first responder agencies in Hammersmith & Fulham between August 2019 and July 2020. This only accounts for the cases known to the partners who share data and therefore the actual numbers of cases are anticipated to be much higher.

Our approach

Hammersmith & Fulham takes a coordinated community response (CCR) to ending modern slavery and asks everyone to take responsibility. The CCR requires us not only to respond appropriately within our own agencies, but also to work together with other organisations.

Our objectives

Objective 1: Victims identified

Identifying people as victims or survivors of modern slavery is important in making sure they can access appropriate support.

Objective 2: Exploitation prevented

By investigating exploitation and empowering individuals to know and exercise their rights, we can prevent exploitation.

Objective 3: Victims supported

Victims and survivors of modern slavery can have a range of needs and our approach is both holistic and trauma-informed.

Objective 4: Exploiters brought to justice

Modern slavery is a crime and exploiters must be brought to justice to prevent them from exploiting others.

Conclusion

Modern slavery is not inevitable.

We have the power to prevent exploitation, bring exploiters to justice and ensure victims and survivors are identified and can access meaningful support. Only by working together can this be achieved.

We look forward to working with you to deliver an approach which is collaborative, trauma-informed, intersectional, gender-informed, and above all puts survivor voices and specialist services as its heart.

Need support?

In an emergency, always call 999. If you come across anything suspicious or need support, contact the Modern Slavery Helpline on 08000 121 700 - the line is open 24/7.

For local services visit the [Angelou website](#).

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Foreword

Modern slavery is one of the most widespread crimes in the world. These crimes are abhorrent, but to make things worse, they can often be happening all around us, in our communities, and right under our noses.

In Hammersmith & Fulham, compassion is at the heart of everything we do, and we are determined to play our part in eradicating modern slavery - whether it's happening within our borough or elsewhere.

To make sure we're doing that, our inaugural modern slavery strategy has been co-produced by partners, including by survivors and residents. The strategy recognises that it is everyone's responsibility to tackle modern slavery. By working together, we can all play our part in preventing exploitation, bringing exploiters to justice, ensuring the best support for survivors, and eradicating modern slavery in Hammersmith & Fulham.

Cllr Sue Fennimore

Deputy leader of Hammersmith & Fulham

Introduction

Hammersmith & Fulham is fully committed to ending modern slavery. Modern slavery is complex, but simply put, it describes a situation where someone is made to do something, and another person gains from this. It is deception or coercion for the purpose of exploitation.

To demonstrate our commitment we have signed the '[Charter Against Modern Slavery](#)' which recognises our responsibilities relating to human rights and modern slavery. Like all modern businesses, when we're buying goods and services, we have a moral responsibility to ensure that the services and suppliers we are using are not involved in exploiting vulnerable people.

Through the charter we have committed to training our team members to identify modern slavery, taking action with suppliers where there are concerns, and raising awareness of modern slavery within our community so we can all make informed, ethical and legal choices. What we do individually and collectively matters.

Individuals

Residents, visitors and the general public

- [What is modern slavery?](#)
- [Our approach](#)
- [Victims identified](#)
- [Exploitation prevented](#)

Community

Faith groups, community and voluntary organisations and education

- [What is modern slavery?](#)
- [Our approach](#)
- [Victims identified](#)
- [Victims supported](#)
- [Approved terminology](#)
- [Questions you could ask](#)

Professional

Business, law enforcement, healthcare, local authority and charities

- [What is modern slavery?](#)
- [Our approach](#)
- [Victims identified](#)
- [Exploitation prevented](#)
- [Victims supported](#)
- [Exploiters brought to justice](#)
- [Approved terminology](#)
- [Questions you could ask](#)

Society

Local, national and international law and policy makers

- [What is modern slavery?](#)
- [Our approach](#)
- [Victims identified](#)
- [Exploitation prevented](#)
- [Victims supported](#)
- [Exploiters brought to justice](#)
- [Approved terminology](#)

Hammersmith & Fulham is a compassionate council. We are committed to investigating exploitation which occurs both locally and internationally.

Metropolitan Police Service data states that 172 modern slavery offences were submitted by first responder agencies in Hammersmith & Fulham between August 2019 to July 2020. This only accounts for the cases known to the partners who share data and therefore the actual numbers of cases are anticipated to be much higher.

This Modern Slavery Strategy sets out our objectives for the next 5 years and how we will achieve them. We recognise that some people are disproportionately at risk of exploitation and or have limited access to resources.

Exploiters take advantage of these vulnerabilities. We will regularly review the modern slavery strategy in line with our Equalities Strategy and Social Value Strategy to ensure we remove barriers to inclusion and inequalities that persist in our communities.

According to government data (NOMIS), 3.6% of the borough's population are claiming out of work benefits, higher than the London average of 3%.

Unemployment in the borough impacts some members of our community more than others, such as:

- Disabled people
- those with Special Educational Needs (SEN)
- the long-term unemployed
- those with mental and physical health conditions
- care leavers
- young people engaged with or at risk of engagement with the criminal justice system
- those from some of our Black, Asian and minority ethnic (BAME) communities.

The Social Value Strategy sets out how we will procure services to ensure that our contractors play a crucial role in supporting the development of their workforce. With the support of our suppliers, we will create more employment and skills related support for these priority groups and in doing so reduce their vulnerability to exploitation.

We will review our modern slavery strategy and action plan on an annual basis to ensure it is consistently relevant and incorporates what we've learned in the previous year. We will proactively work alongside local communities, business and partner agencies to raise awareness of modern slavery including how to spot the signs and where to report concerns.

We will ensure that we are working together to:

- identify and support victims and survivors, including young people at risk through gang affiliation and child sexual exploitation
- provide holistic trauma informed support
- ensure that exploiters are brought to justice.

Our approach will be collaborative and intersectional, putting survivor voices and specialist services at its heart. This strategy and our commitment to ending modern slavery is ongoing, it doesn't end until modern slavery ends.

When this document speaks of 'we' or 'our', it is referring to all partners, present and future, who wish to be involved in this response. We hope it is a useful guide for setting out our vision for ending modern slavery and how we can work together to achieve this.

The H&F strategy has been co-produced by partners across the borough, including survivors, residents, businesses, community groups and multi-agency professionals.

The consultations highlighted the need for the strategy to be accessible to everyone. As such, there is a guide at the start and guidance throughout highlighting how individuals, community groups, multi-agency professionals and wider society can play their part in ending modern slavery.

Participant details are kept anonymous to protect individual's safety and to allow them to speak openly during the above consultations. Stop The Traffik was a key partner in all consultations and in developing this strategy.

1. What is modern slavery?

1.1 Definitions

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

It is deception or coercion for the purpose of exploitation.

Deception or coercion may include: threats, debt bondage and abuse of power or vulnerability.

For anyone under the age of 18, the abuse of vulnerability is automatically present.

The purpose of exploitation may include the following:

- **forced labour:** being made to work for little or no money
- **sexual exploitation:** being coerced or forced into selling sex
- **domestic servitude:** being made to work within a home environment for little or no pay
- **criminal exploitation:** being forced to break the law for someone else (such as begging or selling drugs)
- **forced or sham marriages:** being made to marry someone you don't want to marry
- **organ harvesting:** organs being removed for financial gain.

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

1.2 What are the causes of modern slavery?

Modern slavery is caused by someone taking control of another person.

Poverty, abuse and conflict can make people more vulnerable to being controlled as these factors may lead to precarious journeys, seeking asylum, homelessness, substance misuse, domestic abuse and mental ill health. Exploiters take advantage

of these vulnerabilities, often offering victims a way out of their situation that's too hard to refuse.

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

1.3 Context of modern slavery

In some cases, modern slavery may cross over with other forms of abuse such as child abuse and gender-based violence. Bearing this in mind may be useful when thinking about the support options available for survivors - especially ensuring the safeguarding of children - and when considering laws that could be used to bring exploiters to justice.

It can also be useful when thinking about power dynamics between exploiters and victims or survivors and ensuring this is not replicated by different agencies who are trying to help.

When working with survivors of any form of abuse, it's important to keep in mind the whole picture and recognise that minoritised groups may face additional barriers. Minoritised is a term used by Imkaan which describes communities who are subjected to intersection.

For example, someone's race, class, gender, disability or sexuality can make it harder to leave a situation of exploitation due to fear of stigma and the response they may receive. Seeing someone as a whole person and responding to their diverse needs is called intersectionality – this term was coined by professor Kimberlé Crenshaw in 1989.

Example

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

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

Is modern slavery modern?

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

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

As noted by Anti-Slavery International, we can educate about slavery in the past whilst raising awareness that different forms of modern slavery persist today.

The Modern Slavery Act gives law enforcement the tools to fight modern slavery, ensure perpetrators can receive suitably severe sentences for these appalling crimes and enhance support and protection for victims. H&F are committed to working alongside all our partners including our criminal justice partners to ensure victims are identified and supported and exploiters are brought to justice.

2. The local and national picture

2.1 The local picture

Hammersmith & Fulham have been working closely with third sector organisations to identify the level of exploitation taking place in the borough. One of these organisations is Stop The Traffik, a charity founded in 2006 as a campaigning coalition to bring an end to human trafficking worldwide.

Stop The Traffik have identified 39 cases where the victim or survivor was either recruited or exploited in Hammersmith & Fulham between April 2019 and November 2020. In addition to this there will be a significant number of people living in the borough who were exploited elsewhere. As the Stop The Traffik data only accounts for the cases known to the partners who share data, the actual numbers of cases are anticipated to be much higher.

This is reflected by Metropolitan Police Service (MPS) data which states that 172 modern slavery offences were submitted by first responder agencies in the borough between August 2019 and July 2020. Whilst the offences were recorded in Hammersmith & Fulham it does not mean that the exploitation took place in the borough, however, it shows the level of need for victim and survivor support for people living in the borough.

The National Referral Mechanism (NRM) also records referrals that were made in Hammersmith & Fulham where the exploitation did not necessarily occur in the borough. 55 referrals were made to the NRM by Hammersmith & Fulham between January 2018 and September 2020.

The national referrals

| H&F NATIONAL REFERRAL MECHANISM | TOTAL ADULTS | TOTAL CHILDREN | NOT SPECIFIED |
|--|---------------------|-----------------------|----------------------|
| January to December 2018 | 0 | 16 | Not specified |
| January to December 2019 | 4 | 21 | Not specified |
| January to September 2020 | 3 | 11 | Not specified |
| October to December 2020 | 0 | 6 | 2 |

Each of these agencies records data differently, and over different periods of time, which makes it difficult to directly compare data. Referrals may be made to one agency and not to another, which again makes it difficult to directly compare data.

As the Stop The Traffik data only records cases where the victim or survivor was either recruited or exploited in Hammersmith & Fulham it arguably gives us the best indication of exploitation occurring in the borough. Here is a snapshot of the 39 cases recorded by Stop The Traffik where survivors are known to have been recruited or exploited in Hammersmith & Fulham.

Top 4 survivor nationalities

| NATIONALITY | PERCENTAGE |
|--------------------|-------------------|
| British | 37% |
| Albanian | 11% |
| Chinese | 8% |
| Bangladeshi | 5% |

34% of survivors were 12 to 17 years old. As part of our 5-year strategy we aim to develop child exploitation practice guidance alongside partners, to be launched by March 2022.

Forms of exploitation

| FORMS OF EXPLOITATION | PERCENTAGE |
|-----------------------|------------|
| Sexual exploitation | 29% |
| Forced labour | 27% |
| Criminal exploitation | 23% |
| Domestic servitude | 15% |
| Unknown | 5% |
| Other forms | 1% |

Survivor gender

| GENDER | PERCENTAGE |
|--------|------------|
| Male | 22% |
| Female | 78% |

Face-to-face false job promise was the most common recruitment method.

False job promise and physical abuse were the most common control methods used.

At Hammersmith & Fulham we are committed to improving how we collate and share data with partners so that we can accurately identify victims and survivors and understand the needs that are specific to people being exploited in the borough. This is an integral part of our action plan. We need your help to do this.

If you have information you can share to build the picture of modern slavery in the boroughs, please contact info@stopthetraffik.org

2.2 The national picture

The scale of modern slavery in the UK is significant. Modern slavery crimes are being committed across the country and there has been year on year increases in the number of victims identified.

There were 5,144 modern slavery offences recorded by the police in England and Wales in the year ending March 2019, an increase of 51% from the previous year.

10,627 potential victims of modern slavery were referred into the National Referral Mechanism (NRM) in 2019. A 52% increase from 2018 when 6,986 victims were identified by the NRM. The most common nationality of all referrals to the NRM in 2019 was UK nationals, accounting for 27% (2,836) of all potential victims.

The second most commonly referred nationality was Albanian (1,705 referrals) followed by Vietnamese nationals (887 referrals). Just over half of the referrals were for individuals who were potentially exploited as adults, whilst 43% were for potential victims who were exploited as minors.

The increase in reported police offences and NRM referrals is largely driven by the continued rise in identification of potential victims exploited in UK as opposed to abroad.

Despite the recent increases in reporting and referrals, the extent of modern slavery in the UK is likely to be far greater than the above statistics would suggest.

The Home Office has in its annual report on Modern Slavery for 2020 referenced a report by the Centre for Social Justice, titled 'It still happens here: Fighting UK slavery in the 2020s', which estimated that there could be at least 100,000 victims of modern slavery in the UK.

In a report, by the Office for National Statistics (ONS) published in March 2020, it was highlighted that there were significant challenges in producing an accurate measure of the prevalence of modern slavery, given the hidden nature of this crime, lack of a definitive source of data and difficulties in establishing a suitable method to accurately quantify the number of victims of modern slavery in the UK.

3. Our approach

3.1 The coordinated community response

Hammersmith & Fulham takes a coordinated community response (CCR) to ending modern slavery and asks everyone to take responsibility. The CCR requires us not only to respond appropriately within our own agencies, but also to work together with other organisations.

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

This CCR strategy sets out a shared understanding of how we plan to tackle modern slavery over the next 5 years and reach our overall vision of ending modern slavery in Hammersmith & Fulham.

Examples of agencies that can work together to provide support to the survivor are:

- banks
- charities
- homeless hostels
- housing services
- immigration solicitor
- places of worship
- the Department for Work & Pensions
- the Home Office
- the police

This list was curated from Heise et al 1999, Krug et al 2002 and CDC 2004.

3.2 The ecological model

For the CCR to be successful, everyone needs to work together at an individual, community, professional and societal level. This is called the ecological model and each level is connected and dependent on each other.

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

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

Read more about the ecological model:

- [CDC – Social ecological model](#)
- [An ecological approach toward the prevention and care of victims of domestic minor sex trafficking](#)

Best practice – CCR example 1

Names in all examples have been changed to protect the victims' identities.

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

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

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

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

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

When Anita was discharged from hospital, she was supported through the NRM victim care contract and Tamar continued to provide additional support. With time Anita felt confident in speaking to the police who are currently investigating the case.

Anita also participated in the survivor consultation to help shape this strategy and continue to strengthen our Coordinated Community Response to modern slavery.

4. Our objectives

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

Modern slavery and exploitation coordinated community response

Outline for change:

1. Overall vision
2. Objectives
3. Outcomes
4. Activities

Our overall vision is to end modern slavery.

Objective 1: Victims identified

Outcomes:

- Know the signs
- Victims can ask for help
- We know how to respond

Activities:

- Awareness raising through campaigns and training

Objective 2: Support victims

Outcomes:

- Partners follow duties and best practice
- Referrals are made
- Trauma information is in place

Activities:

- Project delivery
- Information sharing

Objective 3: Exploiters brought to justice

Outcomes:

- Exploiters identified and investigated
- Victims supported to give evidence
- Appropriate intervention is taken

Activities

- Information sharing

Objective 4: Exploitation prevented

Outcomes:

- Employers tackle exploitation
- Demand for ethical services and products
- Adults and children can exercise their rights

Activities

- Project delivery

4.1 Objective 1: Victims identified

Identifying people as victims or survivors of modern slavery is important in making sure they can access appropriate support. Often people - especially children - don't recognise themselves as having been exploited or are too fearful to come forward and ask for help.

So, it's important we can all spot the signs and know what to do. Hammersmith & Fulham is committed to improving our data capture and understanding of modern slavery in the borough.

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

Importantly, survivors emphasised the need to be patient and gain trust, allowing time for them to open up or make decisions about the future. By prioritising 'Victims identified', we are asking everyone to know the signs of modern slavery and know how to respond. We are also working towards removing barriers so that victims and survivors know where to go to ask for help and feel able to do so.

What does 'Victims identified' look like?

Know the signs

Everyone knows that modern slavery is happening here and knows the signs to look out for.

How will we do this?

Embed training and workshops for staff and community groups to raise awareness of modern slavery and referral pathways.

What difference will it make?

It will be harder for exploiters to operate undetected in our neighbourhoods.

Victims can ask for help

The barriers stopping victims coming forward and seeking support are removed. Victims know their rights and the support available for them and feel able to ask for help.

How will we do this?

Focus groups with known victims to understand and remove any barriers they faced. Proactive welfare visits to premises with information and holistic trauma informed support available.

What difference will it make?

More survivors will come forward and feel confident disclosing their situation knowing that there is support available to them.

Know how to respond

Everyone knows what to do if they suspect modern slavery.

How will we do this?

Publish and publicise clear modern slavery referral routes and all license holders will ensure a Stop The Traffik poster is on display in a prominent position where team members and the public can see it and that it is displayed in different languages as appropriate.

What difference will it make?

More survivors can access support and more exploiters can be brought to justice. This will make our communities high-risk and low-profit for exploiters.

The following is a quote from a local community group member: "We need to focus on what makes people vulnerable and how can we remove these vulnerabilities."

The following is a quote from a survivor: "There were so many chances for people to intervene."

The following is a quote from a local business owner: “I caught a shoplifter with her hand in my customer’s handbag. Then I saw two huge men glaring at her once she was caught and I saw the fear in her eyes. I then knew she was a victim and my thoughts turned from anger.”

How can we all play our part in the CCR?

Individual

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

- Learn the [signs of modern slavery](#)
- Call 999 in an emergency
- Call the Modern Slavery Helpline for advice and support or to report suspicions 08000 121 700

Community

Modern slavery is everyone’s business and all members of the community know the signs and how to report suspicions.

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

Professional

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

In addition to the Community recommendations:

- Embed modern slavery awareness training on a whole system level
- Develop your organisation’s response should victims and survivors be identified

Societal

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

- Use our [approved terminology guide](#)
- Use images which help the audience to recognise modern slavery is hidden in plain sight and the ways in which victims and survivors are controlled and unable to escape

Best practice: CCR example 2

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

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

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

George was already known to the YOS and to local police including for suspicion of him using children for dealing drugs. Archie was identified as a victim of criminal exploitation and an NRM referral was made and the matter was adjourned at court for the outcome of the referral to be known.

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

This case highlights the importance of sharing information between agencies, both local and national, in a timely manner and advocates for taking the time to build rapport with victims, survivors and their family to give them opportunities to disclose. For more information visit [Modern Slavery – spot the signs](#).

The following is a quote from a survivor: “Make that person trust you. Show them that you really want to help. Not just one time but come back and keep showing that they want to help.”

The following is a quote from a local faith leader: “It needs to be seen as socially unacceptable to buy goods that might be tainted by exploitation.”

4.2 Objective 2: Exploitation prevented

Modern slavery thrives on vulnerability, money and power; and without preventative efforts it will persist. We are all responsible for preventing exploitation. By buying items that may have been made by someone who wasn't paid or allowed a break, we contribute to the problem. As do businesses who don't investigate where the materials that make their products have come from.

When discussing preventing exploitation, a number of survivors shared how they had been looking for a way out of poverty when they were exploited and that they had no idea a person had the capacity to treat them the way their exploiters treated them. They discussed not having understood the risks of modern slavery and said there were missed opportunities where people could have helped but didn't.

Survivors also shared that not having the legal right to work in the UK whilst waiting for decisions on their case can cause further exploitation as survivors feel forced to work illegally to have enough money to live.

Exploiters take advantage of this by not paying the minimum wage and threatening to tell the immigration authorities if workers complain. Hammersmith & Fulham advocate for supporting survivors right to work and ensuring survivors have qualified immigration advice at the earliest opportunity.

Hammersmith & Fulham have also signed the 'Charter Against Modern Slavery'. In doing so we will ensure that our suppliers are ethical and that the people they employ are not exploited. We require our contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.

We will train our corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply. We will challenge any unusually low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.

We will publicise our whistle-blowing system for staff to call out any suspected examples of modern slavery. We will require all tendered contractors to also adopt a

whistle-blowing policy. To find out more about our commitments to preventing modern slavery in our supply chains please refer to our modern slavery statement

By investigating exploitation in businesses and empowering individuals to know and exercise their rights, we can prevent exploitation and demand that Hammersmith & Fulham is free from modern slavery.

What does 'Exploitation prevented' look like?

Employers tackle exploitation

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

How will we do this?

Ensure employers pledge to pay London Living Wage by providing information and support to local businesses through proactive outreach.

What difference will it make?

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

Demand for ethical services and products

Everyone considers where their products and services come from and demand they've been made free from exploitation.

How will we do this?

Embed awareness training for staff and community groups.

What difference will it make?

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

Adults and children can exercise their rights

Everyone is treated equally with respect and dignity and are able to exercise their workers' rights and their human rights.

How will we do this?

Embed education on worker's rights and human rights in partnership with schools, businesses and community groups. Awareness raising campaigns in partnership with charities such as Stop The Traffik. Targeted work with Albanian, Chinese and Bangladeshi communities as the top survivor nationalities aside from British.

What difference will it make?

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

How can we all play our part in the CCR?

Individual

Individuals can exercise their rights and think about the journey of the things they buy.

- [Know your workers' rights](#)
- [Know your human rights](#)
- [Find organisations which can provide advice and support](#)
- Buy second-hand goods; and ethically-sourced products where you can afford to

Community

There is increased demand for goods/services which are free from exploitation.

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

Professional

Commercial and non-commercial organisations treat employees fairly and mitigate the risks of exploitation.

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

Societal

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

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

Best practice: CCR example 3

Ten agencies including police, councils, NHS healthcare trusts and charities across Hammersmith & Fulham and neighbouring boroughs regularly share anonymous data with Stop The Traffik to understand the local picture of modern slavery.

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

Stop The Traffik worked with experts in the field, including Kalayaan and the Voice of Domestic Workers, to design a short video in English and Tagalog. This was placed as a geo-targeted advert on Facebook, which meant it would appear on the

Facebook feed of Filipino domestic workers in the boroughs. Pre and post campaign surveys were run to measure if there was an increase in awareness or action taken after seeing the video.

Findings included:

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

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

4.3 Objective 3: Victims supported

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

Survivors shared that mental health support and therapy were vital in their recovery journey and that time-limits on support have damaging effects. Survivors also told us that having the right to work would have a positive impact on their recovery journey, providing autonomy and purpose, enabling them to support their family and contribute to the economy.

Children may require additional support, especially in recognising that people they believed to be friends are exploiting them and finding alternative routes to prevent further exploitation. It is important that professionals and volunteers act without judgement or prejudice and are mindful of their own mental health and the effects of secondary trauma.

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

What does 'Victims supported' look like?

Organisations follow duties and best practice

Agencies are aware of their duties in relation to modern slavery and respond appropriately, often going beyond the minimum requirement to give survivors the maximum support. Best practice examples are shared and adopted.

How will we do this?

Develop and disseminate a local toolkit of duties and best practice for organisations to follow.

What difference will it make?

Survivors will be able to access support from the very first time they come into contact with an agency.

Referrals are made

Appropriate referrals for each survivor are made in a timely manner. This may be to the National Referral Mechanism (with informed consent for adults) or to agencies able to provide tailored support to meet a survivor's needs.

How will we do this?

Develop a H&F guide to referrals and the National Referral Mechanism (NRM) with multiple language options.

What difference will it make?

Survivors will be able to access services they need without falling through the gaps. The risks of re-exploitation will be reduced.

Trauma-informed support is in place

All interactions with survivors are trauma-informed and holistic long-term support is available to meet varying needs.

How will we do this?

A strategic needs assessment is undertaken to understand and address current gaps in provision.

What difference will it make?

Survivors will be supported throughout their recovery journey. People will understand what it means to meet the diverse needs of victims.

Whilst each survivor is unique, here are some examples of the immediate and long-term support survivors told us they need.

Immediate support includes:

- Qualified early immigration advice
- DBS checked, qualified interpreter and translation services
- 'Appropriate' accommodation
- Hot food
- Clothes
- Mental health support
- Physical health support
- Childcare
- Criminal solicitor/ legal aid
- Entering NRM with informed consent if 18+
- Safe transport
- Hygiene products

Long term support includes

- 'Appropriate' accommodation
- Mental health support
- Physical health support
- Education and employment
- Criminal solicitor/ legal aid
- Substance misuse support
- Making contact with family
- Claiming benefits
- Safe transport to appointments
- Registering with a GP
- Learning English
- Community support networks
- Application for passport
- Repatriation if requested

How can we all play our part in the CCR?

Individual

Survivors can access long-term trauma-informed support.

- If you see something suspicious, report it to the Modern Slavery Helpline on 0800 121 700

Community

Response is trauma-informed and needs-led, providing indiscriminate support.

Timely referrals are made.

- Ask sensitive questions (use the guide in this strategy)
- Address immediate needs
- Develop referral pathways and consider specialist organisations which can provide support

Professional

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

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

Societal

Consistent trauma-informed long-term support is available for all survivors.

- Ensure immigration status is not a barrier to accessing support and all survivors who are non-UK

Best practice: CCR example 4

After being trafficked from South America to Europe and trapped in debt bondage, Zane began to use class A drugs as a means of escape from the trauma he experienced during his exploitation. Zane became street homeless in the UK and was provided with hotel accommodation as part of the “Everyone In” scheme during the Covid-19 pandemic.

Homeless charity St Mungo’s built rapport with Zane and he felt confident speaking to them about his experience. Zane was put in touch with Turning Point to support with his substance misuse, and with Zane’s informed consent, St Mungo’s contacted Adult Social Care who arranged to make a referral to the National Referral Mechanism (NRM).

Completing the NRM referral took time as the substance misuse meant Zane struggled to engage with the process. The initial meeting was postponed as Zane was experiencing hallucinations. Zane appeared more comfortable speaking to his key worker at St Mungo’s who he saw daily.

As such, St Mungo’s and the social worker, with the help of a qualified interpreter, worked with Zane over multiple sessions to piece together his story. The social worker shared a draft of the NRM referral with St Mungo’s who were able to re-check for accuracy with Zane. St. Mungo’s also liaised with the psychiatrist from the Mental Health Crisis Team who provided a letter to support the NRM, explaining the complex trauma Zane was experiencing due to his exploitation.

It was only once the NRM was submitted did the social worker learn from the Home Office that Zane had already received a positive Reasonable Grounds Decision after the police made an NRM referral earlier in the year. Zane appeared not to have understood that this had happened or what this decision meant. With this confirmed, Zane was able to access support through the Victim Care Contract.

This case highlights some of the challenges for survivors in accessing support, especially when they have additional complex needs. It also demonstrates the need for professionals to go at the pace of the survivor during an NRM referral, collaborate

with specialist agencies, and ensure the survivor has understood the process and provided informed consent.

4.4 Objective 4: Exploiters brought to justice

The following is a quote from a survivor: “You get interrogated and you feel ‘why am I being interrogated? I am the victim.’”

Modern slavery is a crime and exploiters must be brought to justice to prevent them from exploiting others. This is not only the responsibility of the criminal justice system. From the general public as members of a jury, to Environmental Health revoking licenses, we must work together to apply the CCR.

There were 205 suspects of modern slavery flagged cases referred from the police to the Crown Prosecution Service (CPS) for a charging decision in England and Wales in the year ending March 2019. Over two-thirds (68%) of modern slavery related CPS prosecutions in England and Wales resulted in a conviction in the year ending March 2019.

Survivors told us that criminal proceedings are only one aspect of justice. Justice for survivors also means that their stories of exploitation are believed, and they have time to heal. Survivors also highlighted that justice for them would mean justice for all victims and survivors.

What does ‘Exploiters brought to justice’ look like?

Exploiters identified and investigated

All agencies are involved in sharing information to build the intelligence picture and allegations are investigated thoroughly to ensure exploiters are held to account.

How will we do this?

Data is shared with Stop The Traffik and the model is promoted pan-London to encourage wider sharing. Embed clear methods of reporting and create structures for data sharing with partners across the borough.

What difference will it make?

Survivors feel listened to and believed.

Exploiters will not be able to operate undetected.

Victims supported to give evidence

Victims are supported throughout the criminal justice process and beyond, with their mental health at the forefront of considerations.

How will we do this?

A strategic needs assessment is undertaken to understand and address current gaps in provision.

What difference will it make?

Survivors will be more likely to testify, leading to more convictions of exploiters.

Exploiters will know that they will be held to account.

Appropriate intervention is taken

Survivor needs are put at the heart of any action and agencies collaborate to use the tools at their disposal to take a zero-tolerance approach to exploitation.

How will we do this?

Agencies supporting victims are trauma informed and holistic.

Working in partnership with the Police to achieve criminal justice outcomes. Ensuring successful outcomes for victims which are not limited to criminal justice outcomes.

What difference will it make?

Survivors will feel safe and vindicated.

Exploiters will be unable to exploit further victims.

Robust policies and procedures

H&F have a robust policies and procedures in place to ensure businesses operating in the borough have an appropriate license and are observing business regulations. H&F will take action where there are concerns over the management of premises.

How will we do this?

Council officers across departments including but not limited to licensing and business regulations, environmental health & enforcement will work alongside the police, local charities supporting victims and survivors of modern slavery and residents to identify premises where action should be taken.

What difference will it make?

Businesses operating without a license or in breach of the conditions of their license will be referred to the Licensing Committee with a recommendation to have their license revoked alongside an offer of support to victims and survivors identified. Where a criminal offence is established this will be fully investigated by the police.

How can we all play our part in the CCR?

Individual

Survivors are treated as the victim of crime and supported through intervention.

- In an emergency call 999
- Put the needs of victims and survivors ahead of friendship. If you know someone who is an exploiter, report it anonymously to the Modern Slavery Helpline 08000 121 700

Community

Modern slavery is reported as a crime.

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

Professional

Agencies work together to bring exploiters to justice

- Share anonymous data to contribute to building the intelligence picture

- Consider agencies with varying enforcement powers which you could work with to stage intervention
- Provide continued support for survivors throughout the intervention

Societal

Exploiters are held to account and there is a zero tolerance approach to modern slavery.

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

Operation Rumoi

What happened?

1. A woman disclosed to the police that she was a victim of sexual exploitation. With her consent, she was referred to the National Referral Mechanism and accessed support.
2. The police and charity Rahab did welfare visits to properties the victim told them about. They also launched two days of action. Arrests were made and several women were identified as potential victims and survivors.
3. The women were taken to a charity-run reception centre and spoken to separately, but they did not disclose their experiences and did not want to engage with the police. A major part of this was fear of removal from the UK.

How we could have improved

When executing the warrant, the police are mindful of the impact on victims and survivors. Survivors are provided with multiple opportunities to disclose their experiences over time and are given guidance by qualified immigration advisors.

What happened?

4. The police found CCTV which was used to control the women. The exploiters also kept spreadsheets, discussed activities on WhatsApp and promoted their lifestyle on social media, all of which were used in evidence against them.
5. At the trial, the barristers used a note, written by a charity, casting doubt on the victim's credibility. This had not previously been shared with the police.

How we could have improved

Ongoing and meaningful communication between the police and charities continues throughout criminal proceedings.

What happened?

6. The victim only had police support in court and the ordeal took a significant toll on her mental health.

How we could have improved

Specialist organisations are brought in for wraparound support, including mental health services. She is assigned to a victim navigator who supports her through the process and beyond.

What happened?

7. There were 9 defendants, each had their own barrister, which meant the one victim was cross examined by all of them.

How we could have improved

The victim is granted a pre-recorded cross examination under s.28 of the Youth Justice and Criminal Evidence Act so she does not have to wait for the case to go to trial or be in the court room with the exploiters or the jury.

What happened?

8. All 9 were sentenced. However, although there were 32 convictions, none of the defendants were found guilty of modern slavery due to doubts about the victim being free to leave.

How we could have improved

The jury is aware of modern slavery and the 'means' used to control victims and survivors. They know that the victim does not need to be locked in the property for it to be modern slavery and find the exploiters guilty under the Modern Slavery Act.

Outcome

Exploiters are brought to justice. Survivors feel they are listened to, believed and supported throughout the proceedings and continue to access support after the trial has ended.

5. Conclusion

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

Thank you for taking the time to read this strategy. This may be the conclusion but it's the beginning of the next five years and reaching our objectives. We look forward to working with you to deliver an approach which is collaborative, coordinated trauma-informed, Intersectional, gender-informed, and above all puts survivor voices and specialist services as its heart.

So, take another look at the diagrams on how we can play our part, read the action plan below and let's work together to end modern slavery in Hammersmith & Fulham.

The following is a quote from a survivor: "People are not realising they are doing that. They are hearing the word human trafficking, but they don't know what it means."

Appendix 1: Common myths about modern slavery

Myth: People must be locked in or tied up to be victims of modern slavery.

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

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

Myth: It is only modern slavery if the person does not get paid.

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

Myth: Victims of modern slavery are from countries outside the UK.

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

Myth: All victims of modern slavery are women and all exploiters are men.

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

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

Truth: There are many barriers why someone being exploited might not ask for help or when asked, might say that they're fine.

These barriers include:

- not being able to speak the language
- not being aware support is available
- not recognising themselves as victims
- fear for their lives or the lives of family members
- fear of being removed from the country
- juju and other forms of witchcraft
- misplaced loyalty to the exploiter and fear of organisations such as the police.

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

Read the section on [Questions you could ask](#) and [Victims supported](#) to see how taking the time to build trust and ask the right trauma-informed questions can lead to better support for survivors.

Appendix 2: Approved terminology

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

Please consider these three principles:

1. avoid language which places blame on a victim or survivor
2. avoid labels which 'other'; consider saying 'people who are vulnerable to exploitation' as opposed to 'the vulnerable'
3. avoid terms that cannot be easily translated into another language. Rather describe what the term means.

Alpha victim

'Alpha victim' is a term that is used to indicate where victims have been forced, groomed, or have progressed on, to recruit and exploit others. Their conditions may improve despite remaining a victim themselves.

County lines

One of the predominant forms of criminal exploitation we see in the Hammersmith & Fulham is 'County Lines', which is a police term used to describe the exploitation of children or vulnerable adults to move and sell drugs.

It is named after the phone lines often used in the distribution. Exploited individuals may have been groomed to believe they are autonomously selling drugs or that those exploiting them are their friends.

Cuckooing

Cuckooing is a form of crime, termed by the police, in which drug dealers take over the home of a vulnerable person in order to use it as a base for drug dealing. It is named after the cuckoo's practice of taking over other birds' nests.

Exploitation

Exploitation refers to someone else benefiting from the actions performed by an individual who is not appropriately rewarded and or experiences a violation of their legal rights. Exploitation does not always amount to modern slavery, but modern slavery always involves exploitation.

First responder

Only organisations that are considered first responders can refer victims of modern slavery to the NRM. These first responder organisations include local authorities, the Police, Home Office, Border Force, Gangmasters and Labour Abuse Authority (GLAA), Barnardo's (for children) and The Salvation Army (for adults). The NHS is not a first responder.

Girls

Anyone under the age of 18 years of age is considered a child - see the [UN Protocol to Prevent, Suppress and Punish Trafficking in Persons](#)

Females under the age of 18 may be referred to as girls. Referring to women over the age of 18 as girls is considered infantilising.

Children under 18, exploited in prostitution, should be treated as victims of abuse. A child can never be a 'child prostitute'.

Human trafficking

Recruitment, movement or restriction of movement, by deception or coercion, for the purpose of exploitation. Anyone under the age of 18 does not need to be deceived or coerced for it to constitute trafficking - see the [UN Protocol to Prevent, Suppress and Punish Trafficking in Persons](#)

It is key to note that the purpose does not need to take place to meet the definition of human trafficking - it is the intention to exploit that is important.

Note that the term human trafficking does not translate into all languages so consider describing the situation instead.

Individual paying for sexual services

It is not an offence for person A to pay person B for sexual services provided by person B. As long as both are over the age of 18 and person B has not been exploited. It is an offence for a person in a street or public place to solicit another for the purpose of obtaining a sexual service.

Avoid: client and customer as these can be confused with terms used by charities to describe the individuals they support.

Avoid: John and punter as these can minimise the role of individuals paying for sexual services.

Informed consent

Informed consent is vital in all aspects of survivor referral and support. Informed consent equips an individual with the knowledge and context to make their own decisions.

Adults must provide informed consent to enter the NRM, no matter how long it takes for a survivor to make the decision. Without informed consent, survivors can experience re-trauma as situations can emulate exploitation when they had no control.

Intervention

Avoid the term 'rescue' as it denotes a lack of agency for victims and survivors and assumes they need to be saved.

Modern slavery

Modern slavery refers to situations where an individual is deceived, coerced or forced into exploitation. Modern slavery is an umbrella term which encompasses human trafficking, servitude and forced or compulsory labour. It is outlined in the Modern Slavery Act 2015.

National Referral Mechanism (NRM)

The National Referral Mechanism (NRM) is a framework for identifying victims of modern slavery and collecting information to contribute to building a clearer picture about modern slavery in the UK. The NRM was introduced in 2009 to meet the UK's obligations under the Council of European Convention on Action against Trafficking in Human Beings.

Only first responders can make referrals to the NRM. Adult victims of modern slavery must give informed consent to enter the NRM. If they do not wish to enter, an anonymous Duty to Notify referral can be made. All children who are suspected of being a potential victim of modern slavery must be referred into the NRM.

For adult victims, the NRM provides support through the Victim Care Contract. The NRM does not safeguard a child so existing child safeguarding procedure should be followed first and foremost.

Perpetrator

A perpetrator is controlling, coercive, threatening, violent or abusive. This can be psychological, physical, sexual, economical or emotional abuse.

Perpetrators can be any gender. A perpetrator may pose as a friend or a lover to exploit, and therefore may not be recognised as a perpetrator by victims.

Perpetrator, exploiter, trafficker and offender are all approved terms when used correctly - see exploitation and human trafficking.

Premises selling sexual services

Brothel is the definition used in legislation to refer to premises from which one or more individual is involved in selling sexual services. This can include residential properties, hotel rooms, massage parlours, and walk up flats.

However, where possible we will avoid using the word brothel because it can limit our understanding of the context in which women are involved in prostitution or experiencing sexual exploitation. Instead we recommend describing the property as such, "We are making a welfare visit to a residential flat, massage parlour or hotel."

Single Competent Authority

The Single Competent Authority (SCA) is a body within the Home Office who receive all NRM referrals from first responders and make the reasonable grounds decision, conclusive grounds decision, and oversee the submission of the recovery needs assessment.

Smuggling

Smuggling is a voluntary one-off transaction, whereby a person pays another person to help them enter a country clandestinely. It is a crime against the state, whereas human trafficking is a crime against an individual. Smuggling must include a border crossing. Human trafficking may include an illegal border crossing, but this is not required to meet the definition.

With smuggling the relationship between smuggler and smuggled person ends when they reach their destination. In some cases, smuggling may turn into trafficking if exploitation occurs or a person finds themselves owing money for their journey and is made to work to pay this off.

Trauma-informed support

Trauma-informed support recognises the harmful effects of traumatic experiences and aims to minimise the risk of causing further distress. This is done through respect and compassion and working towards long-term stability.

Victim and survivor

The word 'victim' can be helpful for people to come to terms with their experience and know that the exploitation meant they were a victim of crime. The official term for a person entering the NRM is a 'potential victim'. However, 'victim' can also appear dis-empowering and reduce a whole person to a label.

The term 'survivor' can be preferable as it has connotations of strength. Therefore 'victim and survivor' is used wherever possible.

Victim care contract (VCC)

Adults entering the NRM with a Positive Reasonable Grounds Decision can access support through the Victim Care Contract, awarded by the Home Office to The Salvation Army (2020 to 2025).

Through the VCC, victims can access safe-house accommodation, a support worker, subsistence rates and access to health care and legal advice, no matter their immigration status or when or where the exploitation took place.

Vulnerability

There are multiple forms of vulnerability outlined in the UN Organisation on Drugs and Crime guidance, such as personal, situational and circumstantial vulnerability. These vulnerabilities may be pre-existing (such as poverty) and therefore increase the risk of exploitation; and vulnerabilities can also be created by the perpetrator (such as romantic attachment).

Women involved in Prostitution

'Women involved in prostitution' is the preferred term used in the Hammersmith & Fulham as this addresses someone's circumstance rather than using a label which puts upon them an identity.

There is a reticence to adopt 'women involved in sex work' as in some cases it has led to frontline practitioners overlooking vulnerabilities, risk and exploitation.

Appendix 3: Key indicators

Below are some indicators that someone may be experiencing modern slavery.

It is important to recognise that everyone responds differently and that this list is not exhaustive:

- fearful, anxious or distrustful of authorities
- appears malnourished
- shows signs of trauma (physical or psychological)
- suffers injuries that may be the result of controlling measures or that have been left untreated
- unfamiliar with local language or context
- do not know their home or work address
- has a story that sounds rehearsed
- dependency and presence of a controller - allows others to speak for them when addressed directly
- believe they have debt to pay off
- separated from their ID documents
- do not have any days off or unable to leave their work environment
- has limited or no social interaction
- reveals threats have been made against them or their family
- goes missing from home or school.

Appendix 4: Questions you could ask

There are often many barriers, including language, preventing someone from answering 'yes' to the question, 'Are you a victim of modern slavery?'

Avoid questions which could re-traumatise individuals and focus on open, needs-led questions.

The following questions could be asked if it is safe to do so. Conversations should be held in a safe setting, with qualified interpreters if required.

Survivors shared that they need time to build up trust but that it was important people asked the questions and were open-minded and listened to the answers.

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

Appendix 5: Resources

Directory of survivor support services

[Hammersmith & Fulham Council Website](#) - including contact information for social services

[Modern Slavery Helpline](#): 24-hour helpline 0800 0121 700 (available 24/7)

[The Salvation Army](#): 0300 303 8151

[Stop The Traffik](#): +44 (0) 207 921 4258

[Angelou Partnership Directory of Survivor Support Services](#)

[Gangmasters and Labour Abuse Authority](#): reporting line 0800 432 0804

Local pathway - for referring to Hammersmith & Fulham Council

If during work hours (9am to 5pm) contact Social Services Line on 020 8753 4198 (option 3)

If out of hours (5pm to 9am, Monday to Friday, weekends and bank holidays) contact Social Services Emergency Duty Team on 020 8748 8588

If children are involved call Children's Services on 020 8753 6600

If at any point in the process there is an immediate risk, call 999

Statutory guidance

[Slavery and human trafficking in supply chains: guidance for businesses](#)

[Charter against Modern Slavery](#)

[London Local Authorities Act 1991 \(c.xiii\)](#)

Information on the National Referring Mechanism (NRM)

[Leaflets about the NRM in multiple languages](#)

Trauma informed code of conduct

[Helen Bamber trauma-informed support](#)

Other useful information on the H&F website

[Gangs, violence and exploitation](#)

[Licensing and permits A to Z](#)

[Domestic violence](#)

Appendix 6: Action plan

1. Victims identified

Priority action

1.1 A training needs assessment is undertaken, and a training schedule developed and embedded. This will include specific training on child exploitation.

Measurement of success

- Gaps in current training offer identified
- Professionals from 15+ different organisations trained
- Overall training satisfaction rate above 85%.

Timescale: 2021 to 2026 (ongoing)

Priority action

1.2 Continue to run ongoing workshops for community organisations and faith groups to raise awareness of modern slavery and referral pathways (work started in 2020). Targeted work with Albanian, Chinese and Bangladeshi communities as the top survivor nationalities aside from British.

Measurement of success

- 10+ groups attend
- Overall satisfaction rate above 85%
- Increase in referrals

Timescale: 2021 to 2026 (ongoing)

Priority action

1.3 Operation Moontwist training is delivered to Dedicated Ward Officers (DWO) and Safer Neighbourhood Teams (SNT) to encourage proactive welfare visits to premises selling sexual services.

Measurement of success

- 1/3rd of DWO and SNT trained
- Overall training satisfaction rate above 85%
- Qualitative analysis of Op Moontwist Crime reports showing guidance was followed
- Anecdotal positive feedback from the women visited

Timescale: March 2022

Priority action

1.4 Improve our data capture and understanding of Modern Slavery in the borough.

Measurement of success

- Focus groups with survivors
- Data collection methods created to monitor H&F only cases

Timescale: March 2022

2. Exploitation prevented

Priority action

2.1 Promote the launch of the Modern Slavery and Exploitation Strategy, alerting members of the community to their rights and the risks of exploitation, along with signposting for support.

Measurement of success

- Measure impact through feedback from community members and businesses
- Increase in contact to signposted organisations

Timescale: 2021 to 2026 (ongoing)

Priority action

2.2 To continue to raise awareness of MSE and have it as a standing agenda in the programme of events for 16 days of activism against gender based violence which

H&F commits to annually. To ensure events are produced in collaboration with victims and survivors and specialist support services.

Measurement of success

- Collate feedback from the community members at community events
- Collate feedback from professionals at training events

Timescale: 2021 to 2026 (ongoing)

Priority action

2.3 Support Stop The Traffik and other independent charities in their campaigns, share and use (anonymised) data and intel for preventative and proactive campaigns locally.

Measurement of success

- 25% change in recipient's knowledge or behaviour
- Increase in contact to signposted organisations
- Qualitative analysis of social media comments and interactions
- Click through to the website landing page

Timescale: 2021 to 2026 (ongoing)

Priority action

2.4 Embed awareness training in local authority departments, schools, businesses and community groups.

Measurement of success

- Complete training in all service areas
- Develop a strategy to embed training and clear commitments to organisational response

Timescale: 2021 to 2026 (ongoing)

Priority action

2.5 Publish and publicise clear modern slavery referral routes. All Business license holders will ensure a Stop The Traffik poster is on display in a prominent position where team members and the public can see it. It should be displayed in different languages as appropriate.

Measurement of success

- Increased number of enquiries and referrals
- Annual review with residents and businesses

Timescale: 2021 to 2026 (ongoing)

Priority action

2.6 Complete all actions on the modern slavery statement action plan which sets actions relating to modern slavery in supply chains.

Measurement of success

- All actions are completed from the action plan and will have successfully fulfilled the commitments of the modern slavery statement 2020-21

Timescale: 2021

3. Victims supported

Priority action

3.1 Referral pathways and the directory of services are kept updated and a strategic needs assessment is undertaken to understand current support and gaps in provision.

Measurement of success

- Report outlining current support and gaps in provision
- Recommendations taken forward
- Number of partners mentioned in the quarterly shared data

Timescale: 2021 to 2026 (ongoing)

Priority action

3.2 Develop a H&F guide to the National Referring Mechanism (NRM) with multiple language options

Measurement of success

- Increase in NRM/MS1 referrals

Timescale: 2022

Priority action

3.3 Regular and ongoing training for local authority housing, housing associations, privately rented agencies and homeless charities to support them to understand housing law in the context of supporting victims of modern slavery.

Measurement of success

- Review current training and gaps in training
- Develop training programme with expert specialist agencies
- Professionals from over 15 different organisations attend
- Overall satisfaction rate above 85%

Timescale: 2021 to 2026 (ongoing)

Priority action

3.4 Develop and disseminate a local toolkit for Small and Medium sized Enterprises (SMEs)

Measurement of success

- Develop toolkit with consultation with local business
- Toolkit disseminated to 25% of local businesses

Timescale: 2022

Priority action

3.5 Ongoing training for professionals in Adult Social Care, Children Family Services, Neighbourhood Enforcement and Housing; to be trained as First Responders (FR)

Measurement of success

- 25% of workforce to be trained at any one time in each department
- All support is trauma informed

Timescale: 2021 to 2026 (ongoing)

Priority action

3.6 Child exploitation practice guidance is launched.

Measurement of success

- Developed in partnership with schools, children's services, youth offending teams and the gangs violence and exploitation unit
- Multi-agency sharing
- Online launch event March 2022

Timescale: March 2022

4. Exploiters brought to justice

Priority action

4.1 A toolkit outlining enforcement tools (prevention and risk orders, premises closure orders) is produced and shared.

Measurement of success

- Multi-agency collaboration on the document
- Increase in the number of enforcement actions used

Timescale: July 2021

Priority action

4.2 Anonymous data is shared with Stop The Traffik and the model promoted pan-London to encourage wider sharing.

Measurement of success

- 5 MSE Group partners share data quarterly
- Interactive dashboard
- Data in use (proactive, commissioning, reports)

Timescale: 2021 (ongoing)

Priority action

4.3 Sharing information on successful prosecutions of businesses and exploiters if appropriate.

Measurement of success

- Increased prosecution rates

Timescale: 2021 to 2026 (ongoing)

Priority action

4.4 Council officers across departments including but not limited to licensing and business regulations, environmental health & enforcement will work alongside the police, local charities supporting victims and survivors of modern slavery and residents to identify premises where action should be taken

Measurement of success

- An increased number of premises identified
- Increased number of licenses revoked
- An increased number of victims and survivors engaging in support

Timescale: 2021 to 2026 (ongoing)

4.5 Businesses operating without a license or in breach of the conditions of their license will be referred to the Licensing Committee with a recommendation to have their license revoked alongside an offer of support to victims and survivors identified. Where a criminal offence is established this will be fully investigated by the police.

Measurement of success

- An increased number of premises identified
- Increased number of licenses revoked
- An increased number of victims and survivors engaging in support.

Timescale: 2021 to 2026 (ongoing)

Appendix 7: Governance structure

The Modern Slavery and Exploitation (MSE) group will oversee the action plan, ensure that objectives are achieved and coordinate activities across council departments and in the community.

The MSE group will sit within a governance structure that is overseen by the Violence Against Women and Girls Board and reports to the:

- Community Safety Partnership
- H&F Safeguarding Children's partnership
- Safeguarding Adults Board
- Health and Wellbeing Board.

The MSE group will meet quarterly and will include representatives from various council departments and statutory bodies including but not limited to:

- adult safeguarding
- children family services
- community safety unit
- healthcare
- housing
- licensing
- procurement
- the police.

Independent third sector service providers will also be in attendance to offer expert advice and represent victims and survivors.