



Hidden from View

Modern Slavery and Human
Trafficking in Cumbria



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1 Introduction

Forced labour, domestic servitude, sexual exploitation and people trafficking are all crimes that have been present in the UK for centuries. The nature of this may have changed over time but it is still the case that those who are exploited find themselves in the position of powerlessness and fear, working for someone else's gain. Modern Slavery takes various forms: labour exploitation, criminal exploitation such as forced begging or shoplifting, sexual exploitation and domestic servitude. The sophistication of criminal gangs involved in recruiting and controlling people for these purposes means that it is often hidden from view.

The introduction of the Modern Slavery Act in 2015 gave a new focus to the presence of such crimes within modern society and led to an increase in targeted work to identify and support victims of such exploitation. Indeed, in Cumbria, considerable work has been undertaken in the past 5 years to promote the identification of Modern Slavery and Human Trafficking and develop a partnership approach to dealing with cases which are uncovered. With Modern Slavery reported to bring organised crime groups an estimated 150m US dollars per year¹, it is a crime which is not going to go away. A successful bid by the Office of the Police and Crime Commissioner (OPCC) to the Home Office Police Science, Technology Analysis and Research initiative has allowed further research to develop and utilise collective knowledge from a range of agencies in this area. It has also provided the opportunity to review the impact of the work to raise awareness and to develop processes to deal with Modern Slavery and Human Trafficking in the county, to understand whether the full extent of Modern Slavery is being identified. In doing this, the impacts of recent events including Brexit and the Covid-19 pandemic have been considered, alongside any vulnerabilities and features of Modern Slavery related to the rurality of the county. As a programme of initiatives to raise awareness about Modern Slavery with professionals and the public comes to a close and as the work on Modern Slavery moves from being driven by a dedicated role to mainstream activity, it is an ideal time for partner agencies to agree the next steps. This report therefore provides some recommendations for agencies involved in the Safer Cumbria Partnership, which brings together organisations with a role in supporting people affected by antisocial behaviour and crime, including Modern Slavery, and investigating and prosecuting those responsible.

In order to add most value to partnership working in the county, the main focus for this review has been on Modern Slavery involving adult victims, rather than children and young people. A review of child exploitation strategy and pathways is currently being carried out by the Cumbria Safeguarding Children's Partnership so whilst the findings to date have been cross-referenced, the review did not seek to duplicate this. Another area which has not been specifically covered in this review is 'County Lines' activity. The Home Office defines this as "a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move [and store] the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons." Although this can involve Modern Slavery through exploitation and trafficking, it has not been a focus of the review, although points raised by partner agencies as part of the review have been reflected in this report. It was felt by policing professionals to be a related but separate issue with its own characteristics and challenges. Both Child Sexual Exploitation and County Lines have had significant focus in the past few years and, therefore, there has been increased awareness and partnership working in these areas.

¹ Report to United Nations Security Council, 2017.

2 Methodology

This review has sought to collate knowledge from a range of sources across the partnership of agencies which could potentially come into contact with victims of Modern Slavery and exploiters, as well as from law enforcement agencies. It used a 'knowledge mapping' technique, which involved conducting semi-structured interviews with professionals by telephone and collecting information from them via email. A 'snowballing technique' was used where professionals were asked for suitable contacts as a way of identifying the relevant people to speak to. This method is known to be effective in researching a sensitive issue like Modern Slavery where those involved are harder to identify.² An online survey was also created as an alternative method of capturing views for those who wished to remain anonymous or preferred not to commit to a longer telephone interview. A total of 65 individuals provided information, 35 via interview, 9 via email and 21 via online survey. Agencies involved included Cumbria Constabulary; Local Authority homelessness teams; hostels and housing associations; agencies providing support to victims of crime and abuse; organisations working with victims of Modern Slavery (based outside of Cumbria); Churches Together in Cumbria; farmers' networks; a primary school and a Pupil Referral Unit; NHS services; policing intelligence and law enforcement agencies and Crimestoppers. There was also a small number of anonymous responses.

The possibility of gaining first-hand feedback from people who had experienced Modern Slavery in Cumbria was explored. Being conscious of the need to speak to victims at a point where they are in a safe place, both physically and emotionally, to talk about their experiences and the need not to damage an on-going investigation or prosecution, meant that victims needed to have been quite far along their journey. Many victims either wish to return home or are housed outside of the county and do not return so it was not possible to identify someone able to take part. Sanitised case studies were therefore sought and have been included in the report.

The relatively small number of cases (compared with 'volume' crime, for example), the dispersed population of Cumbria and the relatively small number of foreign nationals in the county have made reporting on this research particularly challenging. A significant amount of information has been shared during the research about case studies, police investigations and strengths and weaknesses of the current approach. However, as the report will be available in the public domain, the author has been mindful of not providing information which identifies individual victims or confidential sources of information. This includes details of nationalities, specific types of workplace or locations, or information on perpetrators which might indicate that the authorities are aware of their activity. Instead, information is being shared directly with relevant agencies.

² Hendricks & Blanken, 1992 referenced in [Methodology paper: mapping sex markets | Barefoot Research and Evaluation](#)

3 What is Modern Slavery?

The Safer Cumbria Modern Slavery Partnership Pathways and Guidance document states that:

“Modern Slavery is a crime and encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. A person commits an offence if:

- The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
- The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist. Someone is in slavery if they are:

- Forced to work – through mental or physical threat.
- Owned or controlled by an “employer”, usually through mental or physical abuse or the threat of abuse.
- Dehumanised, treated as a commodity or bought and sold as “property”.
- Physically constrained or has restrictions placed on his/her freedom of movement and
- Human Trafficked.

Contemporary slavery takes various forms and affects people of all ages, gender and races. Adults who are enslaved are not always subject to human trafficking. Recent court cases have found homeless adults, promised paid work opportunities enslaved and forced to work and live in dehumanised conditions, and adults with learning difficulties restricted in their movements and threatened to hand over their finances and work for no gains.

Human trafficking is the movement of a person from one place to another using methods of deception, coercion, the abuse of power or of someone’s vulnerability and for the purposes of exploitation. It is possible to be a victim of trafficking even if their consent has been given to being moved. Human trafficking may occur across international borders or take place within one country. It can include moving a person within a local area or from one premises to another.

From the 1st November 2015, specified public authorities have a duty to notify the Secretary of State any individual identified in England and Wales as a suspected victim of slavery or human trafficking, under section 52 Modern Slavery Act 2015.” This applies even where the person does not identify themselves as a victim.

In this report, the term Modern Slavery is used to describe all forms of slavery and servitude and is often used as global term for Modern Slavery and Human Trafficking. In any discussion about people affected by crime, the language used to describe them varies and can have a significance to those involved. In Government policy and police recording, the term ‘victim’ is commonly used. Those who have experienced crimes such as Modern Slavery, and those who work with them, can prefer to use the term ‘survivor’ rather than ‘victim’, since this recognises the strength needed to survive such horrendous circumstances

and is more empowering. In this report, the term 'victim' is used in most contexts, as this is felt to best reflect any point in the process whereby a person is identified, groomed or recruited, exploited and then helped to escape and recover. It is not used to imply any blame or weakness on the part of the person who has been exploited.

4 Data on Modern Slavery

4.1 National Data Overview

In 2014, the UK Government estimated the number of potential victims of Modern Slavery as between 10,000 and 13,000. The Walk Free Foundation produced a Global Slavery Index in 2018 which put this figure at 136,000. Both estimates are reported to have weaknesses in their methodology and so a variety of other sources of data need to be used.

Between 2016 and 2019, there was an increase in Modern Slavery offences recorded by the Police, which was felt to “reflect improvements in recording practices and increases in general awareness of Modern Slavery”.³ More recent national data which covers the Covid-19 pandemic has not been released at the time of writing, except in relation to referrals to the National Referral Mechanism, which are covered below.

The Modern Slavery Helpline, which provides support to those affected by Modern Slavery as well as a route through which to report concerns about it, received 6052 calls and 1924 webforms and App submissions during 2020.⁴ It reported that 3481 victims were connected with these calls. It saw a decrease of 14% in calls, which it attributed to the impact of the pandemic. Labour exploitation is the most prevalent form indicated but there has been a noticeable rise in sexual exploitation and criminal exploitation, with drugs and begging being the most common types.

The report by the Office of National Statistics on Modern Slavery in the UK: March 2020 recognised that “Collecting legal evidence of Modern Slavery offences can be difficult and the cases are among the most challenging and complex to prosecute”. It states that 5144 Modern Slavery offences were recorded by the police in England and Wales in the year ending March 2019 and by comparison, there were just “205 suspects of Modern Slavery flagged cases referred from the police to the Crown Prosecution Service for a charging decision in England and Wales” in that same year.

4.2 Local Data Overview

The number of crimes and incidents recorded as Modern Slavery in Cumbria since 2015 are shown below. It is worth noting that, prior to 1st April 2019, only Modern Slavery crimes were recorded and that data now also includes Modern Slavery incidents, albeit that these are smaller in number.

³ “Modern Slavery in the UK: March 2020”, Office of National Statistics (March 2020)

⁴ Unseen Modern Slavery and Exploitation Helpline Annual Assessment 2020, Unseen

Number of Modern Slavery Crimes and Reported Incidents of Modern Slavery (January 2015 to March 2021)	
Year	Number
2016	6
2017	17
2018	26
2019	24
2020	13
2021	4
Grand Total	90

As one crime is recorded per victim, this also represents the number of people specifically identified as potential victims of Modern Slavery in Cumbria since 2016. Of these, the majority (60%) were male and 30% were recorded as female, with 10% not having a gender recorded against them. Overall, the numbers are relatively small. As the profile and focus on Modern Slavery nationally and locally increased, this was mirrored with an increase in recorded crimes to 2018. A drop was seen in 2020, which is believed to be, at least in part, due to the Covid-19 lockdown, which has seen the closure of some of prime locations (hospitality and retail) where labour exploitation has been identified in the past. The number of recorded crimes should not be taken as a direct reflection of the incidence of Modern Slavery, since it involves the identification of a specific victim, and the volume of police intelligence would indicate it is likely that a greater prevalence of Modern Slavery than is reflected in the crime figures.

8 offenders have been charged with a total of 32 Modern Slavery offences since 2017, with the majority being charged for offences recorded in 2017. The main offences were holding a person in slavery or servitude and trafficking (arranging or facilitating travel of another person with a view to exploitation). 3 offences were of labour exploitation.

Offence	Number
Arrange or facilitate travel of another person with a view to exploitation	11
Hold person in slavery or servitude	18
Require person to perform forced or compulsory labour	3
Grand Total	32

Police outcomes data for recorded crimes provides a picture of the challenges for investigations. In 29% of cases, the victim did not or was not able to support further police action. The potential reasons for this are discussed in detail later in the report.

5 cases of Modern Slavery in Cumbria were indicated from calls into the Modern Slavery Helpline in 2020, which is consistent with previous years (5 in both 2019 and 2017, 15 in 2018). 4 cases related to labour exploitation and 1 to sexual exploitation. This related to 25 potential victims (18 adult males, 4 adult females and 3 unknown).

4.3 National Referral Mechanism Data

The National Referral Mechanism (NRM) is the framework for identifying and referring potential victims of Modern Slavery and ensuring the appropriate support is received. A defined first responder agency makes a referral to the Single Competent Authority, as it is

known, which makes two assessments. The first, supposed to be completed within 5 days, is to decide whether there are 'reasonable grounds' to believe (but not yet prove) that someone has been the potential victims of Modern Slavery or Human Trafficking from the information available. A positive decision grants the potential victim a period of 'recovery and reflection' of 45 days and allows access to support provided under the national Modern Slavery Victim Care Contract, provided by the Salvation Army through a number of sub-contractors (for victims identified in Cumbria, this is City Hearts). The Single Competent Authority will then investigate and provide a 'conclusive grounds decision' about whether, on the balance of probability, that person is a victim of Modern Slavery or Human Trafficking. Adult potential victims must give their consent to be referred into the NRM process, whereas under 18s do not need to. Where an adult does not consent, there is a duty on defined 'First Responder' organisations to notify the Home Office of the potential victim of Modern Slavery, via a Duty to Notify (MS1) form.

The Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, End of Year Summary for 2020, published by the Home Office, provides a picture of changes in referrals nationally during 2020: "10,613 potential victims of Modern Slavery were referred to the NRM; a similar number to 2019. The plateau in referral numbers is primarily thought to result from the COVID-19 pandemic and associated restrictions. Of these, 63% (6,716) claimed that the exploitation occurred in the UK only, whilst 26% (2,722) claimed that the exploitation took place overseas only. Just under half of referrals (48%; 5,087) were for individuals who claimed they were exploited as adults, whilst 47% (4,946) were for individuals who claimed they were exploited as children. The most common type of exploitation for adults was labour exploitation and for minors was criminal exploitation. Potential victims from the UK, Albania and Vietnam were the three most common nationalities to be referred to the NRM. [...] During 2020, the Duty to Notify process referred 2,178 adults to the Home Office, a similar figure to 2019." It is also worth noting that the majority of victims were male, due to the prevalence of forced labour.

In Cumbria, there were 12 referrals into the NRM in 2020. These referrals were made by Cumbria Constabulary (8), Home Office Immigration Enforcement (1), Home Office UK Visas and Immigration (1), Cumbria County Council (1) and Merseyside Police (1). The NRM referrals from Cumbria Constabulary included 4 children under 18; of these, 2 cases involved sexual exploitation and 3 involved criminal exploitation. Of the 5 adults referred, 3 cases involved labour exploitation and 4 involved criminal exploitation. The nationalities of the persons referred were Albanian, British, Bulgarian Turkish, Romanian and Vietnamese. There were 8 further Duty to Notify submissions made. By comparison, in the period April 2020 to March 2021, there were 15 NRM referrals and 8 Duty to Notify reports. In previous years, the number of NRM referrals and Duty to Notify submissions was higher (in 2019, 26 into the NRM and 5 Duty to Notify submissions, with more cases of labour exploitation and fewer involving criminal exploitation; in 2018, 22 NRM and 3 Duty to Notify submissions), unlike national figures which have 'plateaued' rather than reduced.

5 Types of Modern Slavery and Human Trafficking in Cumbria

During this review, it was evident that, as Modern Slavery is still a very hidden problem, much of the information partners were able to provide was partial. In some cases, this was based on signs they had seen or concerns they had, and further investigation and intelligence development would be required to support or negate evidence of Modern Slavery offences. Given the sophistication of criminal networks and the challenges of victims feeling confident to fully disclose, it is likely that investigations will be complex. Some of this is understood to be underway but it was not appropriate to share full details of it outside of law enforcement agencies. Hence, the information below brings together the intelligence shared by agencies, information from the above crime data and trends seen nationally. The review also found that some professionals and agencies who had an understanding of Modern Slavery had not seen signs of it. It is impossible to say whether this is because the signs were subtle or Modern Slavery is not widespread.

5.1 Labour Exploitation

Nationally, this is the most reported form of Modern Slavery. Cumbria has had some high profile cases of labour exploitation, some of which are currently going through the courts, with victims reporting that they have been made to work long hours and to live in poor quality accommodation provided by the people controlling them. The case studies below show some of the circumstances. The classic features of debt-bonded labour have been seen, where victims report that their identity documents have been taken and people are moved about through multiple-occupancy housing. There have been cases of cannabis cultivation identified where the people found at the location have said they were forced to work there. Intelligence received by the police suggests concerns about some of the environments which are nationally recognised as potential risks for Modern Slavery, including car washes, nail bars, door-to-door sales, takeaways, restaurants and a small number of other employers across the county. This, alongside sexual exploitation, is the most prevalent form in the intelligence. In many of the cases, the alleged perpetrators and victims are foreign nationals, although not all. The review explored the risk of people vulnerable because of homelessness or dependency on drugs or alcohol to being recruited to work and then exploited. Some examples had been known in the past and it was accepted that there may still be cases, which may be more well-hidden now.

Case Study: Suspected Labour Exploitation 2018

A raid by the Gangmasters and the Labour Abuse Authority, supported by the National Crime Agency and Cumbria Constabulary, found a 58-year-old man living in the shed in Carlisle. He was believed to have been kept there for 40 years. He was found to have few personal possessions and the 6-foot, unheated shed only contained a chair, soiled bedding and a metered television. He was taken away for medical attention. The raid followed a 3-year investigation by the GLAA, which resulted in 2 men were charged with Human Trafficking offences. This case is currently going through the courts.

Case Study: Suspected Labour Exploitation in Fishing Industry 2018

Ports Officers found 2 foreign nationals on-board trawler vessels at a seaport in Cumbria. The individuals stated that they had only received a small amount of their promised wage. They were fed out of date food and had dirty accommodation to stay in on the boats. Their clothing was inadequate for the type of work they were expected to do. The males had been offered no medical treatment, were exhausted and in poor physical condition. They were taken away from the trawler to a safe place. However, authorities faced challenges in identifying safe accommodation for them to stay overnight whilst NRM referrals were made and whilst they awaited an initial decision from the Single Competent Authority. Both males were eventually safeguarded by the Salvation Army.

Another area of risk for labour exploitation nationally is agriculture, with workers known to be controlled by unofficial gangmasters, who take their wages and force them to live in poor quality, overcrowded housing or caravans. During this review, a small number of examples concerning labour exploitation on farms in the past were provided. It was also highlighted that the transient nature of the workforce and lack of requirement for farmers who use labour organisations to check individual documentation can make it more difficult to pick up on patterns. No current examples of concerns around exploitation of farm workers were identified. From the interviews overall, it was felt that the nature of farming in the county, with predominantly relatively small family-run farms with livestock, as opposed to large fruit or vegetable farms, means that the labour requirement is reduced and more visible to the farmer. The large number of legitimate organisations providing labour to agriculture was also felt to reduce the need for workers to work in more exploitative environments. Thus, it was felt that the chances of individuals within gangmaster organisations recruiting and exploiting others (without the knowledge of the management) or of farmers themselves using forced labour were relatively low. In some cases, both in relation to takeaways/ restaurants and farming, some of the cases transpired to relate to pay below minimum wage as opposed to conditions which amounted to Modern Slavery.

Feedback provided during the study showed that it was felt that Brexit would have an impact on labour exploitation. Although agencies were alive to the potential changes, it was too early to see how this was playing out. Changes to immigration rules could potentially have positive impacts in reducing the risk of people being trafficked and exploited for work by making it more difficult to enter the country and providing legitimate routes to seasonal work (although this was identified as being less relevant to Cumbria in terms of the type of agriculture, as described above). However, as opportunities for EU nationals to come and work potentially reduce, it was felt that risks of illegal and exploitative activity would increase, particularly as the links are already there between certain countries and the UK. This is common to all other parts of the country so Cumbrian agencies need to continue to work with national bodies such as the immigration authorities, National Crime Agency and Gangmasters and Labour Abuse Authority to gain intelligence about any risks and trends.

Recommendation: Cumbria Police should work with national agencies to collect intelligence on any impact of changes in immigration rules (following Brexit) on risks of Modern Slavery and Human Trafficking which might affect Cumbria.

It is highly likely that the Covid-19 pandemic has had an impact on labour exploitation in the county. With the closure of retail and hospitality, there was the potential to reduce labour exploitation by cutting off several environments where forced labour was suspected to be taking place. Covid-19 restrictions also made it harder to transport and traffic people. However, this has not led to a surge in victims coming forward to agencies for help, as might have been expected and it is likely that those people have been moved into other, more hidden exploitation. Seasonal work has also stopped but that was felt to be less of a potential risk in Cumbria in any case. New opportunities which could be exploited by criminal networks have emerged during the pandemic, particularly the surge in demand for delivery drivers and the changes in checks on documentation as part of recruitment, with virtual replacing face-to-face checks, meaning there are not the same opportunities to pick up where something is not quite right. The lockdown has had a mixed impact on the level of information coming in from the public about potential cases of Modern Slavery and Human Trafficking. Where this has involved breaches of lockdown restrictions, this has made activity more visible to the public, such as people being transported for work and a number of agencies felt that such breaches were being reported by the public. The impact of the pandemic on the amount of intelligence is discussed further later in the report.

5.2 Criminal Exploitation

Cannabis cultivation has been identified as being on the increase and has been found to be spreading into rural areas in other parts of the country. Indeed, there have been a number of cases identified in Cumbria, where both British and foreign nationals have said that they had been made to work on cannabis farms. Given the rural nature of Cumbria, with many isolated properties which might provide attractive places to set up such activity for criminals, public awareness and reporting will continue to be important.

Whilst partners may have struggled to identify cases of 'Modern Slavery', when exploitation of people in related to drug dealing was discussed, many were aware of cases and it appeared to be a common issue. There was a high level of awareness of 'cuckooing' and professionals had seen examples of this, where, for example, someone with a disability or alcohol dependency has been befriended and their property used to run a drugs ring or turned into a party house. It is unclear whether this is due to a recent focus round County Lines and cuckooing by agencies locally and nationally or due to the size of the problem. Vulnerable young people were reported to be being targeted (both locally and travelling into the area to run County Lines). Whilst often dealt with as a separate issue, there is a significant cross-over between County Lines and Modern Slavery. In Cumbria, Modern Slavery legislation has been used in relation to County Lines offences and NRM referrals have been made for young people who have been trafficked in relation to County Lines.

A small number of instances of other potential criminal exploitation were highlighted during the interviews. This included organised begging, where people were believed to have been brought into the area for that purpose, particularly around Christmas time, and organised thefts. In both cases, the individuals involved were believed to have been working for someone else and there was suspicion that they may be being forced to do so.

5.3 Sexual Exploitation

The size and rurality of Cumbria means that it does not have the clear red light districts found in other areas. There has been wide reporting that Cumbria Constabulary is investigating suspicions of sex trafficking and people being forced into prostitution in other locations. This includes reports about the use of hotels, bed and breakfasts and other holiday accommodation for sex work, as well as 'pop-up brothels'. Examples were given during the research of individual advertising such as via adult service websites and of people going to clients' properties for sex work who appeared to be under the control of another person. The link between drugs and sexual exploitation was well recognised by agencies working with people with a drug dependency. Case studies of individuals who were believed to have been coerced into performing sex acts (sometimes on multiple occasions) as repayment for a drug debt were given. Covid-19 restrictions have made signs of sex work and sexual exploitation more obvious: people coming and going from properties have been more likely to be seen or heard and those being trafficked for sexual exploitation are less hidden with the overall reduction in people travelling and police enforcement of Covid-19 regulations. Nationally, there have been reports of people who have found themselves without an income due to the impact of the pandemic returning to sex work and working in more risky situations, taking more risky clients, during the restrictions on movement during lockdown. Given the reliance of Cumbria on tourism and the impact of the closure of hospitality and retail, amongst other sectors, on people's incomes, there is a risk of this happening in the county and so is something that needs to be monitored. The hidden nature of sex work, including that involving forced prostitution, means that agencies likely to come into contact with it need to proactively work together to engage sex workers and build an understanding of what is happening and where.

Although not the focus of this report, sexual exploitation cannot be covered without mentioning the risks to children. As has been seen from the data, a small number of children have been referred into the NRM in relation to sexual exploitation. During the research, some examples of concerns about young people being sexually exploited were provided and there was a feeling that continued awareness raising of the signs, to promote a real understanding amongst professionals and the community, were needed. Funding has been secured from NHS England and Improvement for the Cumbria Safeguarding Children's Partnership and NSPCC to carry out a year-long campaign called 'It's Not OK', which aims to raise awareness of child exploitation amongst young people and the wider public. The current review of child exploitation strategy by the Safeguarding Children's Partnership will identify strengths and areas for further development in the current approach of agencies in the county.

5.4 Domestic Servitude

Nationally, domestic servitude is recognised as particularly hard to spot, as victims are not permitted to leave the house. A small number of cases of domestic servitude have been identified in Cumbria and there have been a small number of reports of suspicions of this from the public. Linked to the above, some case studies were provided of women who were, in effect, being treated as domestic slaves, as well as experiencing physical violence and control at the hands of their husband and his family. In these cases, there was a known or implied indication of

honour-based violence and forced marriage. In one case, the woman was expected to be available all hours of the day to carry out domestic tasks. These cases were being supported through services in Cumbria. Given that domestic servitude is happening behind closed doors, the role of professionals who make home visits is particularly important in their identification. As the Covid-19 pandemic has stopped much of this face-to-face work, the ability to identify this type of Modern Slavery in the county has been reduced.

Case Study: Domestic Servitude 2016

Four suspects asked a Bangladeshi female who was living illegally in London to move to Barrow-in-Furness where she was promised a full-time job as a carer for an elderly lady. Once this female arrived in Barrow, the offenders forced her to work long hours cleaning various properties they owned and she was also sent to work in the kitchen of their restaurant for very little pay. This was not what she had originally agreed to. Offenders beat the female when she protested and threatened that if she left, they would report her to the authorities, who in turn would deport her from the country. This offence occurred over a three-year period. The female managed to leave the property and approached a member of the public in a nearby post office who contacted the police. An NRM referral was made and the initial Home Office assessment suggested that the victim did appear to have suffered Modern Slavery and qualified for full support. The female was safeguarded and moved to a safe house out of the county, arranged by the Salvation Army.

Much of the information about the above types of exploitation has come from professionals and the public. The following section discusses their role in identifying Modern Slavery in more detail.

6 Identification and Action

Whilst all forms of exploitation are, to an extent, hidden from view by the perpetrators, the review has indicated a combination of factors which make Modern Slavery and Human Trafficking particularly challenging to identify:

- Some victims are not on the radar of public agencies due to being foreign nationals, homeless or rough sleeping, or are kept from using public services such as health services, so are not identified;
- Victims are controlled and fearful, or may not even recognise themselves as being exploited, so do not come forward for help;
- Victims need to feel that disclosing their experiences is more beneficial to them than keeping quiet, which requires time to build trust and a system which can keep them safe. This is particularly challenging where they are 'off the radar' and fearful of the authorities (this is all discussed in more detail in the next section);
- Perpetrators go to great lengths to avoid notice by the police and other agencies;
- The general public awareness of Modern Slavery and Human Trafficking is low compared with other types of exploitation, due to a relatively low national profile and the smaller number of known instances compared with more well-recognised abuse such as sexual or domestic abuse (although there is clearly still a long way to go for both of those to be recognised and stopped);
- In a rural, sparsely populated area, this can be compounded by the fact that it is much easier to use buildings which are not overlooked and for movements to go unseen. The police presence is also less concentrated.

All of the above factors make identifying Modern Slavery in Cumbria particularly challenging.

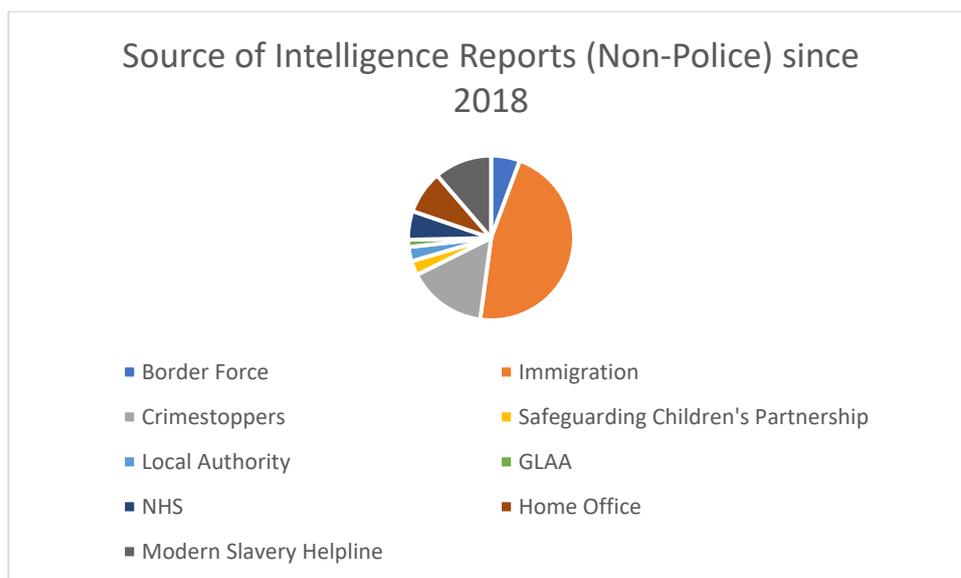
Experience from both Cumbria and agencies working across the country shows that reports of Modern Slavery can come from a variety of sources. Due to the cross-regional nature of human trafficking and criminal networks involved in labour, sexual and criminal exploitation, links with regional intelligence and national law enforcement agencies are crucial. However, it is clear from cases which have been identified that many cases of Modern Slavery can best be picked up on by members of the public, employers and non-policing professionals who see something which is 'not quite right'. Indeed, some professionals interviewed described how the public are not likely to see the full picture of Modern Slavery, given its hidden nature and may see the 'comings and goings' in and out of a property, blacked out windows, hear the noises or see vehicles (such as minibuses) dropping off and picking up people. In rural areas, this can be more difficult to pick up, where many properties are not overlooked. It was highlighted that the "insular" nature, as one professional described it, of smaller, rural communities in Cumbria means that people can tend to keep concerns and issues to themselves because they do not want others to know about it or become an 'outcast'. People can also "turn a blind eye" to something they see for fear of getting involved. Conversely, however, the fact that generation after generation have lived in the same area, particularly on some of the urban housing estates, and that people coming from other areas or countries are few in number, means that anyone coming in from elsewhere would find it hard to hide. Equally, people

living or working in rural areas do notice what is happening in neighbouring farms or premises and can be very good sources of information on anything unusual in their community. Continually building public awareness of the signs of Modern Slavery is therefore vital so that any signs are reported.

During the course of this review, it was found that, if professionals were asked to talk about any cases of Modern Slavery they had seen or been involved with, few came forward. However, when talking about 'exploitation', they were able to describe cases which appeared to involve or clearly were involving the elements of Modern Slavery. This highlights the need for future campaigns and training to use this kind of language in their promotion to engage the maximum number of people.

Recommendation: Future public communications campaigns and promotion of training on Modern Slavery should use language which the target audience can relate to, focussing on the signs and the different types of exploitation.

In terms of other agencies and professionals, a number are feeding in intelligence to the Constabulary, as shown by the chart below. As might be expected, enforcement agencies (Border Force, Immigration and Gangmasters Licensing and Abuse Authority) have provided much of the information and maintaining good link with these will continue to be important. It also shows that awareness within frontline agencies, such as the NHS and Local Authorities, is important in identifying cases of suspected Modern Slavery.



This data also highlights the importance of independent telephone lines where people can report suspicions without going directly to the police. To support this, the OPCC has commissioned a 3-month Crimestoppers campaign starting in February 2021 specifically targeted at encouraging reports of Modern Slavery. This is being carried out via targeted social media, as well as television and newspaper reports and provided an opportunity to reach members of the public more directly, particularly on their social media, than in the past. This had reached over 35,000 people on Facebook and almost 8000 people had clicked the link to find out more via Twitter by 31st March. Whilst this campaign is still running, early indications are that there has been an increase in overall reporting, particularly in relation to drug trafficking. Specific reports of Modern Slavery have been small in

Cumbria to date (2 in the year ending 31st March 2020), as they have in other areas, and the campaign has not, as yet, led to a significant increase in these. Further analysis of key words which would indicate offences related to Modern Slavery but where the member of the public has not specifically identified it as such is planned. It is too early to draw conclusions about the meaning of this. Taking place during the third lockdown, this may have been affected by how much people are seeing in their daily lives and other pressures on them, as well as certain types of labour and criminal exploitation having become even more hidden. However, given the coverage, more reports might have been expected if there was a significant underreported problem in the county. It will be important to analyse the level of reporting at the end of the campaign and to review it again after a period, for example, 12 months to see whether the public is now more aware of the signs and reporting it more.

Recommendation: In 12 months' time, review the level of reporting of Modern Slavery (in all its forms) to Crimestoppers, the Modern Slavery Helpline and Cumbria Constabulary to identify any increases and assess the value of further targeted public awareness raising work.

On a practical level, several professionals talked about how telephone reporting of suspicions was not appropriate for the clients they worked with since people they worked with tended not to have the funds to have credit on their phones. This highlights the need for a range of opportunities for people to report in concerns and this appears to be most effective where existing routes for reporting a range of issues are used, such as housing offices. In terms of agencies which might be able to provide further intelligence or receive disclosures of Modern Slavery-type exploitation, housing services involved in the interviews gave some valuable insights into the situations where people were vulnerable to or being exploited, some of which appeared to have elements of Modern Slavery. Housing associations seemed to be a good source of community intelligence on exploitation (mainly drug-related) within their estates. Many have been involved in recent training on Modern Slavery and it would be beneficial to build on that to develop further links between them and the police. Health professionals also provided several reports of concerns for individuals within their service. Although some staff have undertaken awareness training, experience from other areas suggests that further targeted work with those health services most likely to encounter victims would be beneficial. Some of this work should also focus on sex workers, as an opportunity to develop intelligence on exploitation and identify safeguard opportunities.

Recommendation: Develop relationships to encourage sharing of data and intelligence on concerns about Modern Slavery and sex work between Cumbria Police, housing services (particularly Houses of Multiple Occupation licensing officers) and relevant health services through developing nominated contacts in each organisation.

Although not the focus of this report, the importance of professional awareness in relation to child sexual exploitation was highlighted, both on a one-to-one level and in more organised forms as has been seen in areas like Rotherham and Telford. It was felt to be vital that professionals continued to be alive to the fact that it could be happening and to look for patterns with young people they are working with. Continued training and awareness raising was felt to be needed.

The lockdown during the Covid-19 pandemic has cut off much of the face-to-face contact between professionals and service users. A number of professionals, including from health services and housing services, found that this lack of face-to-face contact had made it much harder to see the non-verbal cues that might indicate they were being controlled or flag up other concerns about their well-being. This has increased the risk of people slipping through the net and so continuing to reinforce the need to look for signs of exploitation will be important as the country emerges from lockdown. The nature of Modern Slavery may have changed and so sources of intelligence and professional training will continue to need to be adapted. It was reported that some benefit had been seen from the impetus to find new ways of working during the pandemic, which had fostered multi-agency working and information sharing to find solutions to providing services in such unusual circumstances. This may have a positive impact on identify individuals at risk of exploitation.

Awareness raising and training in relation to Modern Slavery and Human Trafficking is one area which has been a focus for activities which have taken place in Cumbria over the past 3 years. This has involved a range of agencies and businesses including BAE, Sellafield, Probation, County and District Councils, the University of Cumbria and colleges. Churches Together in Cumbria has also provided great support to this and has arranged training for its members, as well as multiple agencies. Most recently, the OPCC commissioned Slavery Free Alliance to provide a series of webinars, which were targeted to raise awareness in areas identified as potential further sources of intelligence and identification of Modern Slavery: housing and lettings, issues in rural areas and business supply chains. To date, these have been well-attended with over 130 individuals taking part. Feedback from the sessions indicates that there is was a desire and demand amongst professionals to learn more about Modern Slavery (in the first session, most participants attended to learn more about the subject of Modern Slavery (80%), as opposed to specifically understanding the risks to their property or business). Before having training, a small number (3) of those who registered said that they suspected that they might have seen Modern Slavery. Most felt confident in identifying and reporting signs of Modern Slavery following the session (over 55% of respondents were very confident and over 40% somewhat confident in the Lettings and Accommodation Sector session). The current plan for awareness raising and training has now been completed and there is an opportunity for agencies to reflect and agree a plan for future work to ensure that this important element of tackling Modern Slavery in Cumbria continues.

Recommendation: Gain a commitment from first responder agencies and other key partners to a regular programme of training on Modern Slavery, through the trainers who have already completed the ‘Train the Trainer’ course, to ensure new staff are covered and to target appropriate roles which have not yet received training. Review completion of this annually (through an appropriate channel such as Safer Cumbria or the Safeguarding Board training processes).

On-going awareness raising work would ensure that Modern Slavery in all its forms remains on the radar of those most likely to see something unusual. Through this review it became clear that it is those who are working with people vulnerable to exploitation who need to be alert to the signs of exploitation, which may be the first hint of something deeper in terms of Modern Slavery. As much of the Modern

Slavery indicated in Cumbria is likely to be dispersed in privately-owned properties out of the immediate view of authorities, people who have access to dwellings have a potentially important role. The Modern Slavery Problem Profile produced by Cumbria Constabulary in 2017, for example, suggests a useful list of those who could be involved:

- Trades People (Boiler Engineers, Carpenters, Supervisors, Electricians, Plumbers, Brick Layers)
- Environmental Health
- Landlords*
- Caravan Licensing Officers
- Estate Agents*
- Fire Officers
- Utility Providers
- Postal Workers
- Housing Officers*
- Social Services*
- Neighbours
- Cleaners

*Some of these have been invited to past or recent training. This could be aligned with wider safeguarding awareness such as about the signs of other types of abuse they may encounter in the home, although a balance needs to be struck to ensure any training is memorable. This list will need to be kept under review as intelligence about potential trends in exploitation are picked up from national agencies and local sources.

Recommendation: Consider focussing future awareness raising work on frontline services working in and around the home.

Another way in which Modern Slavery offences can be picked up is when the individuals are arrested for criminal activity and several examples of this were given. This is particularly the case for young people who have become involved in drug trafficking for County Lines. It can also be the case for organised begging, shoplifting and other thefts. It is likely that this process will offer opportunity for safeguarding of those 'lower down the hierarchy' of organised crime. Further investigation will be needed to target exploiters.

7 Engagement and Support of Victims

Case Study: Labour Exploitation in a Nail Bar

Information from the community raised a concern about people working in a nail bar in the county. The police co-ordinated a visit to the premises and identified 3 potential victims of Modern Slavery. The potential victims had no warning of the police visit and were taken to a safe place away where they had been working. As they had no personal items with them, they were given a starter bag containing clothing and toiletries. During the time at the safe place, the police spoke with them. A referral was made to the NRM for further support. There were challenges in finding suitable overnight accommodation for them during these initial stages.

Case Study: Trafficking of a Young Man

A young man was found to have entered the country in the back of a lorry with other foreign nationals. Enquiries into them and the driver led to no further enforcement action and he was placed into foster care in another part of the country. His foster parents raised concerns about someone watching him. His accommodation was changed and he later disappeared and could not be located for over 6 months. When the police did find him, he was in another part of the country and had been in hiding for several days. He alleged that he had been forced to work and had sustained injuries from his captors but had managed to escape. He was found foster accommodation and lived there for some time, apparently happily, until he went missing again. Sometime later he was found at the other end of the country and alleged that he had been kidnapped and forced to work again. A number of police forces, including Cumbria, were involved in this investigation. This case is suggestive of someone being trafficked to take part on forced work and that the exploiters were able to repeatedly exert control over the victim, even when he had escaped the situation. The young man easily slipped off the radar, despite being known to public authorities.

7.1 Victims' Needs for Support

As the above case studies indicate, when someone is taken from or escapes from living in a situation of Modern Slavery, they can have a range of needs. Most immediately, they may require health care for injuries or because of poor living conditions and malnourishment. They may not have any personal belongings so need clothing, toiletries and food. Finding them a safe place away from the environment they have been in and away from exploiters needs to be done quickly.

Longer term, victims require safe accommodation and an income to provide for their basic needs. For foreign nationals, many help in relation to immigration because documents may have been seized by their exploiters or they may have entered the country illegally. This can add the difficulty of them having no recourse to public funds making it more difficult to provide for these needs. They may well be suffering from trauma from the control, threats of and actual physical and sexual violence, needing longer-term support to deal with this. They may also have other mental health needs. Some may have drug or alcohol dependencies so require support to reduce their vulnerability as a result of these. Where the person does not speak English to a level which enables them to use these services, an interpreter will be needed, which can be a challenge to arrange in Cumbria. However, examples were given of where this worked well. As one professional explained: "Good partnership work is key to modern day slavery [...] because these cases come with a range of complex needs and as such one agency will not be able to offer the full package of support needed."

Recommendation: The Office of the Police and Crime Commissioner should incorporate the findings of this review into its Victim Needs Assessment, which informs its commissioning of support services for victims and the Police and Crime Plan.

7.2 Encouraging Victims to Tell their Story

Perpetrators of Modern Slavery are adept at exerting control over their victims and keeping what they are doing hidden. It is rare that victims of Modern Slavery come forward to an agency and ask for help. Even when a suspicion of Modern Slavery is reported, successfully engaging victims to the point where they are prepared to talk about being controlled or exploited and further still, to support police action against the perpetrators, is one of the biggest challenges identified by agencies interviewed in this review. A number of reasons were identified for this. Fear was a central factor, whether that be fear of violence from the perpetrators or fear of reprisals against their family, whether in the UK or their home country. It is common for a number of people to have been recruited from one place in their home country. Victims are told stories about the corruption of the UK authorities, which some relate to as they have experienced this in their own country. Exploiters play on fears, telling them that they will get into trouble because they do not have the right immigration paperwork (particularly with their identity documents having been taken) or because they have not paid taxes. Those who have committed a crime such as theft, drug trafficking or begging are likely to be afraid of incrimination. For young people involved in criminal or sexual exploitation, feelings of shame about what they have done are played on by their exploiters and images of them performing sex acts can be used as blackmail, meaning they are too ashamed to tell their family, friends or professionals they come into contact with. In rural areas, the added barriers of a lack of transport and inability to be lost in the crowd make it harder and riskier for people under threat of violence to leave an exploitative situation.

It was also identified that many people who are living in Modern Slavery do not recognise them as 'victims'. They may have grown up in situations where criminal activity and sexual exploitation related to drug debts featured, or in an abusive household, or a culture where sex work is common. Some professionals commented that sex, criminal activity and favours are the "currencies" that they are used to. They were seen to "normalise" sex work or criminal exploitation. Another professional described how clients they work with think: "He doesn't hit me" so he is not abusing me. It was also described how clients with complex needs, including drug and alcohol dependency and mental health issues, for example, have a high level of tolerance of risk before they seek help from agencies. Recognising themselves as a victim would involve changing their whole view of the world so requires long-term work to recognise where they have been controlled.

For some, whether it is adults being exploited for work or young people running County Lines or groomed for sexual exploitation, the 'opportunities' the exploiters can offer them (such as gifts, money, a gang to identify with, a 'boyfriend', a sense of belonging) might seem a good or better option at a point in time, although this may well change later. Others may want to work and stay in the area which they have settled so may feel that they are better off in their current situation, despite low pay or poor working and living conditions. This can be another reason for people not wishing to access support via the National Referral Mechanism.

Where victims are encountered during law enforcement activity such as a police raid, initial approaches by staff involved were felt to make a significant difference in how those organisations are first perceived and whether the victims are likely to engage with them. Actions which show that agencies are trying to help them, rather than enforcement, in the

first stages are felt to be more likely to develop trust: involving immigration services, for example, would reinforce fears, whereas taking people to a safe place and seeing to some basic needs first may help them to open up and allow officers to establish the nature of the situation. Another way in which it was felt that victims could be encouraged to engage with the authorities was by making a future visit once action had been taken so that those who had initially not engaged or had said that they were not experiencing Modern Slavery had the opportunity to engage a second time.

Another opportunity to encourage victims of sexual and criminal exploitation to disclose what is happening to them was felt to be where they were working with an agency already. They needed to be able to see that they were better off by disclosing what was happening to them than by keeping quiet, which often meant that someone else needed to have disclosed before them so that they could see what happened to them. The victim needed to feel that they are believed. This can be a difficult line to tread for policing agencies which have a role in investigating the circumstances fully and where there is experience of people claiming exploitation as a defence when investigated for certain offences (drugs trafficking or cannabis cultivation, for example). The agency needed to be able to work with them for the length of time required to build that trust, which can be considerable given that they may be wary of trusting anyone. The challenge would then be when the police or other agency got involved as the victim may not trust them with a disclosure. Those agencies needed to be able to keep the person safe in the interim so clearly, close collaborative working between agencies is required. The issue of how offences they committed as part of the exploitation are dealt with was also flagged as a challenge: if someone involved in criminal exploitation is charged with an offence, it makes it difficult for them and any other victims who are watching to trust the police and people in positions of authority.

If we are to increase the number of people who accept help and the ability to charge and prosecute offenders, the initial engagement with people affected is key and this requires adequate time and resource to manage that process. The interviews highlighted some good examples of where the Police had worked with other agencies, such as housing and Third Sector organisations, to put in place services for victims where there was a planned raid where victims of Modern Slavery were expected to be found. Cumbria Constabulary has adopted national good practice by using a reception centre as a safe place to take victims to, which is away from the environment they have been living or working in. The need to separate victims from those who were controlling them was felt to be key but it was recognised that this is not always easy to identify. Taking someone to a safe place offers an opportunity to provide for some basic needs of the victims such as food and fresh clothing and to start to develop some trust with the people involved. From officers' experience, it took victims some time to start to make disclosures so maximising the length of time for which this was available on the day would be beneficial. It was felt that the choice of who spoke to them and how they went about it was very important. Cumbria Constabulary has trained 10 Modern Slavery Victim Liaison Officers which should support this. It also highlighted a case study of where a police officer from another force was brought in to assist with victim liaison in Romanian. A number of guidance documents have been produced for police officers on working with victims in the 'Golden Hour' after first contact and there is national good practice guidance about the use of reception centres produced by the Modern Slavery Police Transformation Unit. Given the relative infrequency with which these skills are required to be used, due to number of cases and spread of those across different areas and shifts, looking at a way to maintain them will be important.

Recommendation: Cumbria Constabulary and law enforcement agencies operating in the county should continue to follow good practice in how they approach operations

where they expect to identify victims of Modern Slavery or Human Trafficking, including use of the Golden Hour Documents and good practice in relation to use of reception centres.

Cumbria Constabulary should continue to engage with partners agencies to set up appropriate support for victims where they are expected to be found as part of an operation.

In reality, many cases will not be pre-planned and access to a 'safe place' and emergency support could be required anywhere in the county. Some good progress has been made in the last couple of years to make available safe spaces to which victims can be taken in the first hours after they are identified. Victim 'starter bags' containing clothes, toiletries and other essential items have been put together, with the support of the Soroptimists and Rotary Clubs and funding from the Police and Crime Commissioner's Property Fund. Accommodation is likely to be required for up to 5 days whilst a referral to the NRM is made and an initial 'Reasonable Grounds' Decision is made. As the person is unlikely to have access to funds, given the circumstances in which they have found themselves, food and drink, as a minimum, also needs to be provided. Interviews revealed some cases where there had been challenges in accessing emergency overnight accommodation in the past and food and drink has had to be paid for by Cumbria Police. Good progress has been made in terms of the accommodation, with the District Councils having provided confirmation that they would arrange this. This new arrangement has worked so far and, as it is still early days, it was felt that this should be kept under review, particularly in terms of whether any issues arise with how long the accommodation is available for. This may be required for 5 days (or more) until a 'Reasonable Grounds' Decision is made but Local Authorities have advised they may only be able to provide this for 3. An alternative arrangement has been made for emergencies by Cumbria Police which provides another option but this may not be suitable in all cases.

Recommendation: Agree a lead and keep under review the availability of emergency accommodation for victims removed from an exploitative environment to confirm that the agreement with Local Authorities is working in practice. Where the person does not want to relocate away from the area or is not eligible for a safe house provided via the Salvation Army contract, review whether accommodation has been provided locally, if required.

Recommendation: Look at good practice from Cheshire to support an agreement on which agency funds food and drink for victims whilst in emergency accommodation.

Wherever the victim is temporarily housed, they are likely to be isolated as they have been taken away from the place they were living in and may have had contact with family and friends cut off during their exploitation. On-going communication with them by the police and other agencies who might need to address short-term needs identified initially is very important both for their safety, well-being and to encourage them to continue to support an investigation. It is understood that this has not been an issue in Cumbria to date.

In cases involving foreign nationals, language was understandably identified as a barrier to engagement. Those interviewed were cognisant to the risk that the person interpreting could in fact be passing messages and making threats on behalf of the perpetrators so the use of an interpreter from a reputable source was important. However, accessing this could be a challenge, particularly for cases where the victims were discovered unexpectedly, and has sometimes led to delays which have made the experience even more difficult for the victim.

Interviews showed that alternative arrangements had been explored in relation to this but to date, a solution had not been found.

7.3 Support after the Initial Phase

For victims identified in Cumbria, the main source of longer-term support is through the National Referral Mechanism, which often involves people being moved out of the area to larger bases of support. A number of people commented that they felt that this support process had been positive, providing a good 'safeguarding tool' for victims who are vulnerable to being re-exploited or reprisals. Given the relatively small number of victims identified in the county to date, this national service also offers victims access to a specialist service with experience in working with victims of Modern Slavery, which would not be possible in the county due to low numbers. There have been concerns raised nationally about the length of that support (45 days, although a new Reach-In service has been commissioned for survivors requiring further help to access after the 45 days). There are also concerns about the impact of isolation from family and friends for victims taken to safe houses and of limited subsistence income since they are not allowed to work. It was highlighted that this brings with it a risk that some people may return to exploitation as they believe they are better off in that situation, earning some money, albeit low paid. This can also occur after the end of the NRM support because they find that they have limited other options and they have been in that situation for most of their life. This review has not explored that in any detail and it is believed that this is being reviewed nationally. A number of people interviewed reported that victims seek repatriation through the NRM process as their main desire is to return home. This can bring with it its own risks of being re-exploited as the exploiters know where they or their families live and there is a reliance on local law enforcement to keep them safe. Some individuals who return cannot find work so can be re-exploited. It is important that law enforcement and local agencies are alive to the fact that individuals are at risk of exploitation again. This potentially paints a very negative picture of the likely outcomes for victims. However, examples were given of victims identified in Cumbria who have escaped Modern Slavery and gone on to work in the UK and abroad.

It was reported by several law enforcement officers that they had experienced how a victim may initially engage to get help out of their immediate situation but may not wish to support a prosecution. As court cases can take place some considerable time after the event, it is perhaps understandable that victims do not wish to keep reliving their experiences and want to move on with their lives. Some interviewees discussed the potential benefits of having special measures similar to those developed for victims of other types of crime and even victimless prosecutions to increase the number of cases which are prosecuted. Some examples of the added challenges of bringing victims to a prosecution were also described. This included the choice a victim would have to make between remaining at work or coming to the UK for several weeks to take part in a court case, due to difficulty in evidencing and claiming back loss of earnings. The international travel restrictions related to Covid-19 have also proved a challenge in bringing witnesses to the county.

It should be noted that some adult victims may not consent to the NRM process from the start. Whilst cases of this were mentioned in Cumbria, details of on-going support and contact were not clear. In these cases, there is still a duty to safeguard the individuals from harm and it may be necessary to provide support should they wish to stay in the county (for example, where they have links here prior to their exploitation). There is also the potential for there to be cases where someone enters the NRM but is not eligible for the accommodation part of the support, which is aimed at those who have no recourse to public funds. Local services may need to find accommodation and/or offer other support where they are deemed

to have a care and support need. Where other areas have looked into this, they have found cases of gaps and a lack of clarity in who provides support. A pragmatic arrangement would be appropriate locally for the small number of likely cases, which could draw on existing local support if needed (such as social care where a 'care and support need' is identified, local housing services for accommodation, third sector organisations for trauma, support to cope and recover from abuse and exploitation). Above all, an awareness and commitment to providing that support is required and an understanding that this does not cease after 5 days.

Recommendation: Conduct an annual dip sample of a small number of Modern Slavery cases as part of the Victims' Quality Assessment Framework under Safer Cumbria to review how well the support has worked and bring together any issues with accessing local or NRM support.

7.4 Vulnerability to Victimisation

Interviews conducted during this review provided a good picture of people who may be vulnerable to types of exploitation which could extend into Modern Slavery. What came out clearly was that people with drug dependency, or who have been offered drugs for free as part of a grooming process, can be exploited sexually or criminally to pay for drug debts. People with an alcohol dependency could equally be taken advantage of. Those who were without permanent housing, including people who were homeless, rough sleeping, sofa surfing or living in hostel accommodation, could be targeted by exploiters, particularly where they had a drug or alcohol dependency or housing arrears which made their accommodation choices very limited. They were reported to form relationships with people who could provide somewhere to stay or drugs and then be exploited or sofa surf with people who exploit them (for example, giving sexual favours to 'pay rent' for their accommodation). Whilst not the focus here, the vulnerability of young people to grooming and involvement in drugs running, such as for County Lines, was also raised. Certain nationalities were also identified as vulnerable to labour exploitation on arrival in the UK or to trafficking for sexual exploitation and this reflected the national picture: Eastern European females (for sex work) and males (for labour exploitation), Vietnamese males and females (labour exploitation). During the pandemic, sex workers, including those who have previously been involved but had left it, have also been felt to be at greater risk of harm and exploitation.

8 Prevention

Clearly, the ultimate goal for organisations and the public in Cumbria is to prevent Modern Slavery and Human Trafficking from happening in the first place. With Cumbria sitting on some major north-south and east-west transport links, the risk that criminal gangs try to move into the area is live. The rural nature of the county brings with it a risks of criminals choosing to set up activities in sparsely populated areas because they are much easier to conceal and because of a belief that a less concentrated presence of police and other agencies means law enforcement will not focus on this location. The importance of a continued scrutiny of suspected criminal activity and maintaining a high profile of the issues was emphasised to ensure that criminal networks do not set up in the county. Existing organised crime groups in the county also need to be prevented from moving into new forms of exploitation or Human Trafficking.

The awareness raising and training discussed above is also crucial in preventing the wider spread of both. This should not just be for professionals: the role of the local community was also highlighted as a way in which all forms of Modern Slavery can be prevented. In particular, the role of family in spotting the early signs was highlighted as important in stopping grooming before it develops into exploitation. This reiterates recommendations above about the importance of continued work to raise awareness of the general public, even where it does not immediately result in a large number of cases being identified.

Organisations can also stop Modern Slavery practices by carrying out the proper checks and balances. This is important in Cumbria for people letting out property, whether commercial or residential, and includes those with holiday accommodation, which can be less regulated and very easy to book without an audit trail (as such Air BnB). The role and responsibility of employers was also highlighted: not just those legally required to produce a Modern Slavery Statement but for all organisations to check their supply chain and the source of their labour. During the research, some good practice examples from other areas were noted where work is being done with larger employers to raise their understanding about labour exploitation and supply chain checks, which would have a preventative effect in Cumbria. A webinar aimed at businesses at the end of April related to their supply chain risks provided an opportunity to start this work and could be built on with targeted work with larger employers in the county.

Recommendation: Review the reach and impact of training on business supply chains and agree next steps for working with larger employers on labour exploitation and supply chain audits.

Recommendation: Public sector agencies should include evaluation of bidding organisations' approach to eradicating slavery from their supply chains as part of their procurement of contracts of an appropriate value, not just for those required to have an Anti-Slavery Statement.

9 Conclusions and Recommendations

Cumbria is not alone in facing a challenge in estimating the number of Modern Slavery victims in the county. By its very nature, Modern Slavery is particularly hidden and hard to identify. Numbers of cases of Modern Slavery recorded by Cumbria Police are relatively small. This review therefore sought to collate the knowledge of a range of agencies involved in law enforcement and working on the frontline in Cumbria to better understand what might be happening across the county. Given the hidden nature of Modern Slavery, much of this information only gave a partial picture and it would only be with the benefit of a full investigation, where the victims were confident enough to open up, that the true nature of the situation would become clear. Whilst this makes it hard to draw firm conclusions on the extent of Modern Slavery in the county, this did show that all of the main types of exploitation seen elsewhere in the country (labour, criminal and sexual, as well as domestic servitude) are being seen in the local area, with a higher number of suspected victims of Modern Slavery in the county than the headline figures on recorded crimes suggests. It is clear that Cumbria is not immune to criminals exploiting local people or bringing people into the county for exploitation. Organisations and the public need to be alive to the possibility of Modern Slavery in all its forms and keep informed of what is happening elsewhere, to create a hostile environment for offenders. This is particularly important given that rurality of many parts of Cumbria, which could make it easier to hide such activities from view.

Much has been done in the county to develop awareness and partnership working around tackling Modern Slavery. Now the focus needs to be on agreeing the next steps to keep Modern Slavery on everyone's radar, to prevent it taking a hold here and to ensure victims get the best service possible when they are identified. It involves mainstreaming some of the work which was led by the dedicated Modern Slavery Co-ordinator previously and providing some targeted work to take efforts to tackle Modern Slavery to the next stage. Inevitably, with so many competing priorities and Modern Slavery being an issue which professionals do not deal with on a regular basis, there is a danger that the focus will reduce if there is not a programme of activities and agreed responsibilities between agencies. Another area of focus needs to be on the needs of victims, both in terms of how they are initially rescued from the exploitative environment, how they are supported in the first few days thereafter, as well as how well the support works for those who remain in the county longer-term. The level of control, limitation on freedom, threats and actual violence carried out by perpetrators has a deep impact on victims, who find themselves trapped in that situation. Hence, the response to Modern Slavery needs to reflect the severity of these crimes, not just the numbers.

The recommendations set out in this report centre around four main areas: awareness, identification, training and addressing victims' needs. The detailed recommendations are set out below. These will be discussed by partner agencies involved in the Safer Cumbria partnership and actions to address them agreed, to provide the next steps for partnership work to prevent and tackle Modern Slavery in Cumbria.

9.1 Awareness Raising

Recommendation: Future public communications campaigns and promotion of training on Modern Slavery should use language which the target audience can relate to, focussing on the signs and the different types of exploitation.

Recommendation: Agree responsibilities for planning and providing an annual programme of multi-agency public awareness raising, such as through a dedicated lead or task and finish

group or consider building it into safeguarding organisations' or Safer Cumbria organisations' communications plans.

Recommendation: Consider focussing future awareness raising work on frontline services working in and around the home.

Recommendation: In 12 months' time, review the level of reporting of Modern Slavery (in all its forms) to Crimestoppers, Modern Slavery Helpline and Cumbria Police to identify any increase and assess the value of further targeted public awareness raising work.

9.2 Identifying Modern Slavery

Recommendation: Cumbria Police should work with national agencies to collect intelligence on any impact of changes in immigration rules (following Brexit) on risks of Modern Slavery and Human Trafficking which might affect Cumbria.

Recommendation: Develop relationships to encourage sharing of data and intelligence on concerns about Modern Slavery between Cumbria Police, housing services (particularly Houses of Multiple Occupation licensing officers) and relevant health services through developing nominated contacts in each organisation.

Recommendation: Review the reach and impact of training on business supply chains and agree next steps for working with larger employers on labour exploitation and supply chain audits.

Recommendation: Public sector agencies should include evaluation of bidding organisations' approach to eradicating slavery from their supply chains as part of their procurement of contracts of an appropriate value, not just for those required to have an Anti-Slavery Statement.

9.3 Training

Recommendation: Gain a commitment from first responder agencies and other key partners to a regular programme of training on Modern Slavery and review completion of this annually (through an appropriate channel such as Safer Cumbria or the Safeguarding Board training processes).

9.4 Supporting Victims

Recommendation: The Office of the Police and Crime Commissioner should incorporate the findings of this review into its Victim Needs Assessment, which informs its commissioning of support services for victims and the Police and Crime Plan

Recommendation: Cumbria Constabulary and law enforcement agencies operating in the county should continue to follow good practice in how they approach operations where they expect to identify victims of Modern Slavery or Human Trafficking, including use of the Golden Hour Documents and good practice in relation to use of reception centres.

Recommendation: Continue to support the involvement of Churches Together in Cumbria in carrying out training and provision of support for victims and agree a lead role to continue this engagement.

Recommendation: Keep under review the availability of emergency accommodation for victims removed from an exploitative environment to confirm that the agreement with Local Authorities is working in practice. Where the person does not want to relocate away from the

area or is not eligible for a safe house provided via the Salvation Army contract, review whether accommodation has been provided locally, if required.

Recommendation: Look at good practice from Cheshire to support an agreement on which agency funds food and drink for victims whilst in emergency accommodation.

Recommendation: Conduct an annual dip sample of a small number of Modern Slavery cases as part of the Victims' Quality Assessment Framework under Safer Cumbria to review how well the support has worked and bring together any issues with accessing local or NRM support.



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Funded by the Home Office
2021