

Epping Forest District Council

Modern Slavery & Human Trafficking Policy and Reporting Procedure

September 2017

Version	1	Status	FINAL
Implementation Date	September 2017	Review Date	November 2017
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Introduction

Modern slavery is a serious and often brutal crime in which people are treated as commodities and exploited for criminal gain. The true extent of modern slavery in the UK, and indeed globally, is unknown. In particular, human trafficking is an international problem and victims may have entered the UK legally, on forged documentation, or they may be British citizens living in the UK.

Modern slavery includes human trafficking, slavery, servitude and forced and compulsory labour. Exploitation takes a number of forms, including sexual exploitation, forced manual labour and domestic servitude, and victims come from all walks of life. Victims may be unwilling to come forward to law enforcement or public protection agencies, not seeing themselves as victims, or fearing further reprisals from their abusers. Victims may also not always be recognised as such by those who come into contact with them.

The aim of this Policy is to provide guidance on how the Council will safeguard potential victims of modern slavery and how we will work in partnership with other local statutory organisations.

Scope

This Policy applies to all services within the remit of Epping Forest District Council, including Elected Members, all EFDC employees ie. permanent or temporary, casual workers, voluntary workers, work experience students, agency staff, consultants, outside hirers and other contracted persons within the duration of that contract. It applies to work carried out in all settings (whether they are based in Council premises or at an external privately hired venue) whatever their position, role, or responsibilities.

National Referral Mechanism

The UK Government signed the Council of Europe Convention on Action against Trafficking in Human Beings in 2007, which led to the creation of the UK's National Referral Mechanism (NRM) in 2009.

The NRM is a victim identification and support process, which is designed to make it easier for all agencies that are involved in a trafficking case to co-operate, share information about potential victims and facilitate their access to advice, accommodation and support.

The Council has a responsibility to refer any cases of Modern Slavery under the NRM.

Indicators of modern slavery – how to spot a potential victim

All Council staff need to know and understand the signs that may indicate a person is a victim of modern slavery, in order to decide whether to raise a concern. Potential victims of modern slavery may be reluctant to come forward with information, not recognise themselves as victims and tell their stories with obvious errors. It is not uncommon for traffickers or modern slavery facilitators to provide stories for victims to tell if approached by the authorities. Errors or lack of reality may be because their initial stories are composed by others and learnt.

Victims' early accounts may also be affected by the impact of trauma. In particular, victims may experience post-traumatic stress disorder, which can result in symptoms of hostility; aggression; difficulty in recalling details or entire episodes, and difficulty concentrating. Child victims may find it additionally hard to disclose anything, as the traffickers may have given them inaccurate information about the role of authorities or, they may have had bad experiences with corrupt authorities in their home country or during their journey.

If a victim's trafficker or modern slavery facilitator is present when the victim is questioned, it is important that staff look out for non-verbal communication and body language between them.

Human Trafficking

This is the movement of a person from one place to another into conditions of exploitation, using deception, coercion, the abuse of power or the abuse of someone's vulnerability. It's possible to be a victim even if consent has been given to being moved. Although human trafficking often involves an international cross-border element, it also happens within an individuals' own country.

The essence of human trafficking is that the victim is coerced or deceived into a situation where they are exploited.

There are three main elements of human trafficking:

Action: This is the recruitment, transportation, transfer, harbouring or receipt, which includes an element of movement whether national or cross-border;

Means: The above is achieved by threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability; and,

Exploitation: This is the purpose of the trafficking eg sexual exploitation, forced labour or domestic servitude, slavery, financial exploitation, illegal adoption, removal of organs.

All 3 of these components must be present for it to be an adult trafficking case. However, in a child trafficking case, the 'means' component is not required as they are not able to give informed consent.

Children and young people

Modern slavery, including child trafficking, is child abuse.

If staff come into contact with a child who may have been exploited or trafficked, Local Authority Children's Services and the police must be notified immediately. All children, irrespective of their immigration status, are entitled to safeguarding and protection under the law.

Where there is reason to believe a victim could be a child, the individual must be given the benefit of the doubt and treated as a child until an assessment is carried out.

Who is responsible for making a referral?

Safeguarding is the responsibility of *everyone* and anyone can raise a safeguarding concern.

Staff are not responsible for deciding whether or not someone is a victim of modern slavery and/or human trafficking, but they *are* responsible for reporting their concerns.

Usually, within the Council the procedure is that safeguarding concerns are sent to the Safeguarding Team in the first instance. However, in some cases of Modern Slavery, staff may have to make their own referrals, including if they have face-to-face contact with a potential victim, or if it is identified outside of normal working hours.

Other relevant EFDC documents

Other EFDC policies and procedures linked to this policy are:

- Safeguarding Children, Young People and Adults Policy and Procedure
- Honour Based Abuse Policy and Procedures
- Prevent Policy

Staff need to monitor internal Council bulletins and Intranet pages for new and updated versions of relevant safeguarding policies and referral forms.

External documents

- Home Office document: Victims of modern slavery – frontline staff guidance: Version 2.
- Southend, Essex & Thurrock (SET) - Child Protection Procedures.
- Southend, Essex & Thurrock (SET) - Safeguarding Adult Guidelines.
- See the Essex Police website for their Human Trafficking and Modern Slavery page.

The Council's Intranet also has more information in the 'Safeguarding' section.

Reporting Procedure

Staff need to be aware of the following procedures.

- If potential victim(s) present themselves at a Council Office, staff should take them to a safe and secure environment - away from any potential threat eg. Staff Canteen in the Civic Offices (don't use the Interview Rooms in Reception, they are too exposed).
- CALL **999** and ask for immediate assistance from the **Police** (and **ambulance** if they need urgent medical attention).
- While waiting for the emergency services, staff should call the **Community Safety/Safeguarding Team** for support and assistance (see below for contact details). They will provide advice and guidance as to who else should be contacted.
- If there is a child/children present, staff should also call **Essex Social Services** on **0345 603 7627** and ensure the Police are told about this when they arrive.
- Reassure the potential victim(s) and explain what action they are taking (if possible).
- Stay with the potential victim(s) until the Police and/or the ambulance crew arrive. If this is not possible, staff must 'hand over' to another staff member so they are not left alone.
- Record details for the emergency services and/or investigating agencies when they arrive. Include notes of what is being said to the potential victim, but only if it is safe to do so ie. the perpetrator is not present.
- Ask any witnesses if they can stay and provide information to the Police if it's safe to do so, or take names and contact details for future reference.
- Inform their line manager as soon as possible, if they haven't already done so.

Sharing Information/Intelligence

If staff are concerned about a situation or a third party has told staff about their concerns about a potential victim, they should:

- Record what is said as accurately as possible.
- Report the concern to the Safeguarding Team via the usual procedure ie. complete a Safeguarding Report Form within **one working day** of the concern being raised/established.

If staff need to discuss a safeguarding issue, they should ring the Safeguarding Team to discuss:

Community Safety Manager	Caroline Wiggins	01992 564122
Community Safety Officer	Paul Gardener	01992 564341
Safeguarding Officer	Lynn Maidment	01992 564000 x 2706
Safeguarding Co-ordinating Officer	Claire Baccarini	01992 564223

Further Help and Advice

- **Modern Day Slavery Helpline** on **0800 0121 700**.
- **Salvation Army confidential Helpline** on **0300 303 8151** (24 hours a day, seven days a week).
- If someone wants to pass on information that could lead to the identification, discovery and recovery of victims in the UK, but wants to remain anonymous, ask them to contact **Crimestoppers** on **0800 555 111**.