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Operation Fort Safeguarding and Multi-Agency Working Debriefing Report

4Ps Team

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Operation Fort Summary

An organised crime group of five men and three women of Polish Roma decent lured vulnerable people from Poland, including the homeless, ex-prisoners and alcoholics with the promise of employment, money and accommodation. In reality they were forced to work long hours on farms, in waste recycling centres and turkey factories and given as little as £20 per week by the traffickers who pocketed the bulk of their salaries. If they objected, they were beaten or threatened with violence and told family members back home would be attacked. Some were told they would be taken to the woods to dig their own graves. One man who had an accident at work was forced back to the factory and denied hospital treatment, leaving him with long-term damage to his arm. Most felt powerless to escape, with no knowledge of the area, little or no English language skills and no-one to turn to for help. Their lives were reduced to misery and they all have the physical and psychological scars of exploitation.

Trafficked workers were housed in vermin-infested properties dotted across Birmingham, often crammed four to a room, fed out-of-date food and forced to scavenge for bedding and mattresses to sleep on. Some properties had no working toilets, heating, furniture or hot water and victims were forced to wash in canal water.

Traffickers opened bank accounts in victims' names, using addresses where the victims were not living, but were controlled by the Exploiters who were handing over anything from £100 to just £20 per week to their illegal work force. It meant in some cases the 'slaves' – ranging in age from 17 to a man in his 60s – were receiving just 50 pence per hour. The group also topped up their criminal takings by claiming benefits in the victims' names without their knowledge. It is estimated the abusers made in excess of £2million between June 2012 and October 2017 and enjoyed a lavish lifestyle, buying designer clothes and driving around in a Bentley and other high-end cars.

West Midlands Police launched an investigation in February 2015 when two victims escaped from their captors and disclosed offences to a local church outreach worker who contacted slavery charity Hope for Justice.

1. Hope for Justice

- 1.1 Hope for Justice is a global non-profit organisation with the mission to end human trafficking and modern slavery. When Operation Fort first began in 2015 it was one of their staff, working alongside a support worker, who first recognised there were victims in his area within the Polish community. The support worker was an advisor from a church group and had received some training from Hope for Justice on spotting signs of Modern Slavery. They supported the victims and attended the local police station with them to speak with police. Their support then continued throughout the operation as they identified more than 30 new victims coming forward during the busiest week.

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- 1.2 The support worker is Polish and at times was used as an interpreter and single point of contact for many victims so found he came under increasing pressure. As a result, he quickly became well known in the community to both victims and traffickers and so carried a lot of risk.
- 1.3 From the first visit to the police station there were difficulties faced by both the charity and the victims around communication and processes in terms of who to speak to and which police department was taking the lead. During visits they made to police stations with victims from different local authority areas, they faced long waiting times to speak to someone and were not clear about who had responsibility at each stage of the investigation or knowledge of the National Referral Mechanism (NRM) process. At that time the level of understanding from police officers they spoke to varied considerably and as more victims came forward from different policing areas different police CID teams were being allocated the crimes individually as they had not at that stage appreciated the links between the reports. The local police had not worked with Hope for Justice before and the charity felt at that time they were not trusted by police officers they spoke to and consequently had to fight hard to be listened to.
- 1.4 Those staff working closely with the victims held large amounts of information and intelligence that was being shared with them. Some staff were unsure of the pathway for referring this information to police, the mechanism and format for doing so and what information was important for the police investigation team to know.
- 1.5 The Salvation Army were used as first responders by Hope for Justice and issues around communication between them and the victims were apparent very early on. At times the Salvation Army felt unable to share information about where victims were being housed and for Hope for Justice this caused difficulties in continuing the support for the victim.
- 1.6 There were problems with differences in interpretation of the NRM process such as who was going to conduct an initial assessment interview and as a result the process sometimes took longer than it should have. This meant some victims were housed in hotels by Hope for Justice and in some cases, victims disengaged or repatriated as they felt uncomfortable with some of the questioning and whether their story was being believed.
- 1.7 Dialogue with the safe houses was difficult at times and they had not appreciated the complex needs of the victims nor were they able to provide the high level of support necessary due to the trauma some victims had experienced. Hope for Justice also wanted to be able to meet with the victims in person to be able to effectively assess their needs and this proved difficult at times due to the rules in place by the safe house.
- 1.8 Key workers at the safe houses were subcontracted by the Salvation Army and the standard of key worker varied. For example, some were encouraging victims to return to their home countries at the earliest opportunity.
- 1.9 Hope for Justice were being contacted by the media for information and they took steps to ensure they had a co-ordinator in post to manage this.

- 1.10 Hope for Justice tried to work with banks where multiple accounts were being opened by traffickers. At that time however the banks were not open to the offer of support or engaging in work alongside the charity. They also approached the recruitment company involved in the investigation and highlighted they believed a member of their staff was working on behalf of the traffickers. At that time the company were not willing to take any action as the individual was creating so much business for them.
- 1.11 Independent advocates were key to ensuring victims knew about their benefit entitlements keeping them informed of any changes and keeping the investigation team up to date with contact details. Some victims were reluctant to claim benefits because they did not fully understand or trust the system.

2. Victim Journey

- 2.1 Hope for Justice identified there were extreme anxieties and misunderstandings for victims around reporting based on a mistrust of the authority figures they were asked to engage with. There were barriers around language, culture and the spread of false information from within their own communities which was coming from the traffickers.
- 2.2 The spread of misinformation affected the relationship between victims and Hope for Justice and as a result their referral pathways. There was a push for repatriation from key workers at the safe houses and this caused conflict for the charity as it caused loss of trust and confidence with them as some of the victims felt they were being pushed to return to their home countries where they did not feel safe. There was also misconception that Hope for Justice were working closely with Immigration Enforcement.
- 2.3 In the early stages of the investigation the victims were not clear who the police officers dealing with their case were and who their single point of contact was. At one point a victim turned up at a police station at the same time as an offender answering bail and this could have potentially been avoided had clear communication pathways been in place.
- 2.4 There were issues with traffickers turning up at hotels and victims going missing during the early stages of the NRM.
- 2.5 Hope for Justice took victims to safe houses who were then moved by staff within the safe house without Hope for Justice being informed making their support problematic.
- 2.6 Victims were not given written information in their own language when they arrived at the safe house. Due to their trauma and often complex mental health issues it is important the key workers in the safe houses continually update the victims both verbally and in written form and the need for repetition is important.

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- 2.7 Some victims felt their only option to remain in the UK was to co-operate with the police and they therefore felt pressured to do so.
- 2.8 Victims were given the wrong advice around welfare benefits and this led to them panicking and accepting further exploitative work because they felt they had no other option in order to support themselves to live day to day.
- 2.9 Around ten victims within the operation could not access emergency housing as they were unable to produce three weeks wage slips. Some needed longer to decide about the NRM process and so should have been offered this but instead relied on Hope for Justice who were also trying to protect them as they remained at risk from traffickers. Homelessness was an issue that many victims faced both pre and post the NRM process.
- 2.10 Some victims exited the safe house as they felt able to work, but their mental health began to suffer, and they quickly deteriorated. Ongoing access to support was not always available or the victims did not know who to contact.
- 2.11 One victim described feeling he would be better off with his traffickers as a result of his experience during the NRM process
- 2.12 Victims were encouraged to do a court visit supported by Hope for Justice and the Investigation Team so they could understand the system as screens were used, and they were advised around any risks. By visually seeing this as early as possible it offered reassurance and allowed the support workers to gauge their psychological state by their reaction towards the prospect of giving evidence.
- 2.13 Special measures were used in Op Fort and applications for this went in early and were granted quickly. Due to pressures on the investigation team some victims were left alone in the hotel during the trial and it was highlighted they would have benefited from further support as they had long periods on their own to worry and become anxious about what was expected of them. The date of the trial kept changing and it was important for all agencies involved to be kept up to date to ensure the victim could be told in person and reassured. It helped that a Polish speaking Police Officer was available to victims during the trial.

3. Other Partner Agency Involvement

- 3.1 All agencies reported they felt the time delay between the investigation being initiated and their being informed of the potential to be involved was hugely disadvantageous. Enforcement agencies such as GLAA, DWP, HMRC and the Environment Agency reported that they could have added value to the criminal investigation by relieving some of the pressure on Police in their specific areas of expertise.
- 3.2 The Department for Work and Pensions became involved with Op Fort at the stage the offenders had already been arrested, they had not been involved with the investigation from the start. They were overwhelmed with the work load they faced in terms of assisting with

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the prosecution case and were also in a position of having to understand all the details of a very complex investigation at a very late stage.

- 3.3 The Gangmaster Labour Abuse Authority (GLAA) had previously carried out some Organised Crime Group mapping in 2012/13 and as a result identified a threat and a potential 43 victims of Modern Slavery in the Walsall and surrounding area, they then had no further involvement in the case. The mapping process helps to identify geographically where organised crime occurs, who is involved and where the offenders operate and reside. It also provides a consistent measure of the scope and nature of the problem and evaluates and analyses the information and the threat that is posed.
- 3.4 The National Crime Agency then carried out their own assessment and did not score the OCG as high risk and as a result it was not considered a priority. This was partly due to key victims wishing to remain anonymous. The more information you have the higher an OCG is scored and at this time this process was being carried out in different ways within different organisations.
- 3.5 HMRC were not involved from the beginning of Op Fort but were asked to carry out checks by police when one of the offenders wanted to fund their bail with a large amount of cash. They were able to establish if they were self-employed and carried out their own investigation when irregularities were discovered.
- 3.6 The Environmental Health Agency were feeding intelligence into the police but were receiving no information back. If agencies are not being told if the information, they have is relevant or valuable they are more likely to stop feeding into the process. They attended some of the warrants but did not fully understand the issues at that time.
- 3.7 All agencies talked about the difficulties they faced with staff understanding how to effectively complete a Government Agency Intelligence Network (GAIN) referral or refer any information they felt was important for police officers to be aware of. It was identified the GAIN process needed to be regularly reviewed to ensure the information was being passed to the appropriate departments.
- 3.8 Police had submitted applications to the GAIN process to request what information organisations held that could assist with the investigation, but very limited information came back as a result. The submissions were not reviewed and re-referred as the investigation continued.

4. Recommendations

4.1 General

- 4.1.1 Good practice suggests that at the earliest opportunity all agencies are brought together at a strategic level to set a memorandum of understanding for collaborative working and to identify ownership and objectives.
- 4.1.2 Following the strategic meeting, all key agencies should set out a clear Memorandum of Understanding and meet at a tactical level to define roles and responsibilities and agree thematic priorities, communication strategies and to work meaningfully together as partners at an operational level, with regular ongoing debriefs.
- 4.1.3 Agencies should be part of an early identification process to ensure victims are being supported effectively and the links between potential offenders and victims are picked up. This can be in the form of a Disruption Meeting or a Multi-Agency Risk Assessment Conference (MARAC) where you can identify, share and manage risk among key agencies. The MARAC process in Modern Slavery is only in place currently in South Wales. This process can ensure effective action is taken at an early stage and can contribute to any mapping process which may already be in place within police intelligence unit.
- 4.1.4 The GAIN process should be implemented efficiently and meaningfully and not relied upon as a sole pathway to identify multi-agency involvement. If any safeguarding concerns are identified all agencies should ensure existing pathways are considered for both adults and children. If the GAIN process is completed, consider multiple requests at key stages of the progression of the investigation to maximise partner agency involvement.
- 4.1.5 Intelligence sharing should continue throughout with feedback being offered when possible to partner agencies as to the relevance and quality of submissions. All agencies should be trained how to submit an effective intelligence submission and understand what happens with the information they provide. Hope for Justice revealed a rich source of information, but with limited understanding of how and where to submit that information to police and relied upon previous experience of key individuals rather than a defined process, which could reduce the value of the intelligence picture.

4.2 Victim Care

- 4.2.1 Housing victims before, during and after the NRM process should be a consistent and streamlined process. Victims are more vulnerable to further exploitation and at increased risk of harm if their basic needs are not being met and homelessness is more of an issue now due to a decrease in the number of projects and support that is available.

- 4.2.2 There should be a clear understanding amongst agencies of their obligation to keep the victim and key agencies updated at all stages of the investigation and a streamlining of information sharing around data.
- 4.2.3 There is a need for more training to understand a victim's level of needs within the NRM process. Some victims are not given the same priority from different services in terms of need for example for single males in the case of Op Fort were not viewed as a vulnerable victim of Modern Slavery and Human Trafficking. This could be a training collaboration alongside local NGO's but should include police officers who may be the first point of contact for a victim.
- 4.2.4 As part of the initial contact with victims and to consider whilst completing the electronic NRM, first responders should ensure the victim has access to clear guidance in their language around their rights whilst in this country.
- 4.2.5 Clarity is needed from the Home Office around who is responsible for housing victims during the five days before a Reasonable Grounds decision is made dependent on their circumstances. There have been many examples of this causing problems as the response appears to vary across the country.
- 4.2.6 Police forces should consider having a designated Victim Liaison Officer (VLO), providing direct contact for victims and their support workers to the investigation team and collaborative working and communication with external agencies. VLO training in Modern Slavery Investigations is now in place in some Police forces.

4.3 Post Investigation

- 4.3.1 Effective support for the victim before and during any trial is essential. They should have any information explained to them in person and in their own language, considering any cultural differences. The victim is looking for ongoing reassurance and this should include any information about the release of the offender. The use of interpreters should be encouraged at all stages including any court visits. Within Op Fort they were able to utilise Polish Police officers who worked as part of the investigation.
- 4.3.2 Any exit strategy must include all agencies involved in the investigation as well as in the area where the victim has settled. This should include for example policies within the Housing act, and all with a core aim to stabilise and support the victim. The VLO role can provide support at all stages of any investigation from initial reporting to post-trial support.
- 4.3.3 Any immediate safeguarding needs were referred into the Health service and Children's social care during Op Fort, however there is a clear need for comprehensive staff training across all organisations around referral pathways involving victims of Modern Slavery and a more joined up approach around the NRM, multi-agency safeguarding processes and the investigation. All agencies should ensure a referral has been made into the relevant safeguarding process alongside an NRM referral.