

# South Tyneside Modern Slavery Strategy



South Tyneside Council

**HELLO TOMORROW  
CHANGE IS HAPPENING**

# South Tyneside Modern Slavery Strategy

---

## Introduction

### Foreword

“It is devastating to think that in modern Britain, the horrors of slavery and human trafficking can continue to persist. Yet they do, and often in plain sight on ordinary-seeming streets and in homes and businesses. In order to protect hidden victims suffering terrible injustices, it is essential that we all take proactive steps to support the police and others to combat this horrific crime.

Tackling Modern Slavery is everyone’s business. It is important that all teams and services within the Council understand their various roles and responsibilities in relation to recognising and responding to this horrific crime. It is important too, that we lead others in our community by raising awareness and activating schools, businesses and third sector groups as our eyes and ears in rooting out and reporting concerns.

There ought to be no place for slavery in South Tyneside. By making it harder for perpetrators of slavery to operate, by raising community awareness of the signs of slavery, and by identifying and supporting victims who are being denied their rights, we can work restore the dignity of victims and we can work to make our community inhospitable to those who would seek to benefit from exploiting others.”

Cllr Iain Malcolm, Leader of South Tyneside Council

## **What is Modern Slavery?**

“Modern Slavery” is the act of holding a person in a position of slavery, servitude, forced or compulsory labour or debt bondage for the purpose of exploitation. Human trafficking is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, and abuse of vulnerability, deception or other means for the purpose of exploitation. Trafficking often involves an element of international border-crossing, but may alternatively involve domestic movement, for example between different towns or localities.

Sexual exploitation is one of the most common purposes for slavery or trafficking, particularly for women and children. Other slaves or trafficking victims are forced into labour in a range of industries, including agriculture, construction, hospitality, manufacturing or cleaning. Others are held in domestic slavery. Still others may be forced into criminal activities, such as theft, begging or drug production.

Modern slavery takes place in the UK as well as across the globe. The Government estimates that there are tens of thousands of people in modern slavery in the UK today.

There is no ‘typical’ victim of slavery. Both men and women can be victims of slavery. Victims range in age from young children to those of working age to the elderly. There are a significant number of British nationals in slavery, as well as foreign nationals from across the globe.

Some groups are particularly vulnerable to becoming a victim of slavery, including those with learning disabilities, limited English, limited nearby social networks, a history of previous abuse and exploitation, or a reason to distrust authorities (such as those fleeing international conflict and violence).

Victims end up at the mercy of perpetrators for a range of reasons, including debt (e.g. of recruitment fees or smuggling costs), deception (e.g. false promises of a job) or threats of violence. Victims may also be or feel unable to escape exploitation because of a lack of understanding of their rights, fear of societal retribution, or a lack of resources, help or documentation necessary to find an alternative way of living.

## **Local and Regional Context**

A recent Salvation Army report indicated that, next to London, the North East was the region with the highest incidence of Modern Slavery in the country, with more than 200 victims referred to them from the North East within the last year.

Although South Tyneside has had low exposure to modern slavery in recent years, police intelligence tells us a number of slavery and trafficking incidents identified in other parts of the North East have been perpetrated by South Tyneside residents.

It is therefore vital that the South Tyneside community remain vigilant to the ongoing threat of Modern Slavery, and that we collectively do all we can to deter and apprehend perpetrators and identify and support victims.

## Legal Context

The Modern Slavery Act 2015 is the primary piece of legislation governing modern slavery, including requirements placed on local authorities. The Act consolidated previous offences relating to trafficking and slavery and introduced a range of new measures around the prevention of modern slavery and the support and protection of victims of modern slavery. Among other things, the Act created the Independent Anti-Slavery Commissioner and its associated functions, mandated that all businesses of a certain size produce annual modern slavery transparency statements, and established a duty on 'first responder' organisations to notify the Home Office of the identification of any suspected victim of slavery or trafficking (through the National Referral Mechanism).

There are also three pieces of international law that govern the support afforded to modern slavery victims:

- The Council of Europe Convention on Action Against Trafficking in Human Beings 2005 CETS 197 ("ECAT")
- The EU Directive on Preventing and Combating Trafficking in Human Beings and Protecting its Victims Directive 2011/36/EU ("Anti-Trafficking Directive")
- The European Convention on Human Rights ("ECHR")

This international legal framework requires that victims must be provided with accommodation and subsistence support, regardless of nationality or immigration status, and must be afforded dignity and respect at all times.

The Care Act 2014 also sets out a number of specific duties relevant to supporting victims, including the need to protect a person from abuse and neglect, a duty to assess a person's need for care or support, and, where eligibility criteria are met as part of the assessment, a duty to meet the adult's needs for care and support. Victims of modern slavery do not always neatly meet the eligibility criteria pursuant to the Care and Support (Eligibility Criteria) Regulations 2015 to receive support under Section 18 of the Care Act, but it should be noted that Section 19 of the Care Act provides a power to meet needs for care and support in relation to which no duty arises. This power should be considered in light of international legal obligations to victims as detailed above.

## Risks

As well as the moral obligation to act and the statutory requirements placed upon the Council in relation to supporting victims, there are a number of risks to the organisation that are associated with failure to prepare for and respond effectively to potential or actual Modern Slavery:

- Modern Slavery cases can be high-profile and attract considerable media interest. Cases where victims are improperly supported or should have been identified at an earlier point have the potential to cause significant reputational damage.
- Community tensions can increase in response to the identification of modern slavery, particularly where victims or perpetrators are associated with particular ethnic or religious groups.
- Newly identified victims of modern slavery may require immediate, unplanned-for accommodation and support which can bring unexpected cost pressures, particularly where a group of victims has been identified at once.

- Officers interacting with victims or encountering potential sites of modern slavery without proper training have the potential to unwittingly compromise evidence which could damage the chances of securing a prosecution against the perpetrators.
- The Modern Slavery Act 2015 requires that all large organisation with an annual turnover of more than £36m must undertake effective due diligence in procurement and report upon this in an annual transparency statement. There has been a significant increase in prosecutions for non-compliance in recent years, as well as organisations being ‘named and shamed’.

## **Responsibility**

A wide range of officers have responsibilities for combating Modern Slavery as detailed in the plan below. Stuart Reid, Corporate Director for Business and Resources, is the responsible senior officer named in the Modern Slavery Statement.

## **Partnership Working**

Although this strategy is primarily concerned with strengthening internal Council functions relating to tackling Modern Slavery, it sits alongside a number of related partnership arrangements. Modern Slavery can only be tackled through cooperative partnership working, and a number of local, regional and national agencies have different roles to play in tackling this crime.

Key national partners include:

- The Independent Anti-Slavery Commissioner
- National Crime Agency
- The Home Office
- Gang masters and Labour Abuse Authority
- UK Visas and Immigration
- Hope for Justice
- NHS England
- British Red Cross
- Salvation Army

Key local and regional partners include:

- Northumbria Police
- The Police and Crime Commissioner
- The South Tyneside Local Children’s Safeguarding Board and Safeguarding Adults Board
- South Tyneside Homes
- Local health partners, including South Tyneside Clinical Commissioning Group
- The North East Local Enterprise Partnership

The wider community, including residents, schools, faith and third sector organisations and local businesses are key allies in identifying modern slavery and trafficking.

The South Tyneside Partnership Boards and other forums for multi-agency working are therefore an essential tool in combating Modern Slavery in South Tyneside.

Alongside this organisation-specific strategy, the Local Safeguarding Children's Board and Safeguarding Adults Board also recently led in the production of the partnership Modern Slavery Strategy, to which South Tyneside Council is a party, and which provides an overview of intentions to collaborate on pursuing, preventing, protecting and preparing for crimes of modern slavery at a partnership level.

## **Related Policies, Strategies and Procedures**

This Strategy sits alongside a number of related South Tyneside Council and partner strategies, policies and procedures, as well as a number of national strategies and frameworks. These include:

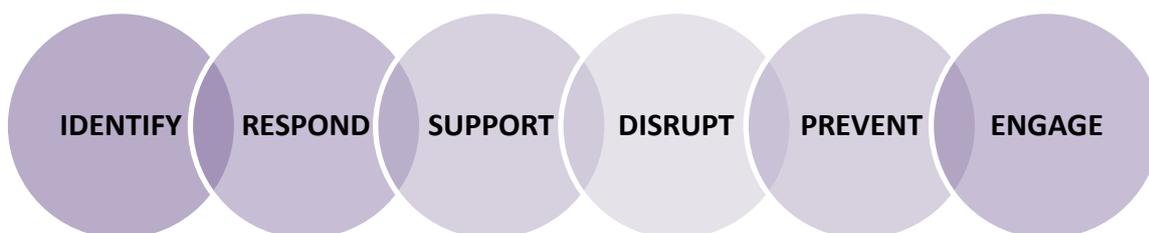
- HM Government Modern Slavery Strategy
- Independent Anti-Slavery Commissioner Strategic Plan
- Home Office / National Crime Agency Strategy on Serious and Organised Crime
- Northumbria Police Modern Slavery and Human Trafficking Strategy
- 'Making Communities Safer' South Tyneside Community Safety Partnership Plan
- Northumbria Local Resilience Forum Major and Critical Multi-Agency Incident Declaration Protocol
- South Tyneside Modern Slavery, Trafficking and Exploitation Response Plan
- South Tyneside Modern Slavery Statement
- South Tyneside Safeguarding Children Board Policies and Procedures, including but not limited to:
  - Child Sexual Exploitation
  - Children Missing from Home and Care
  - Framework for Screening, Assessment, Safeguarding and Disruption and Review: Missing, Sexual Exploited and Trafficked
  - Children from Abroad, including Victims of Modern Slavery, Trafficking and Exploitation
  - Gang Activity, Youth Violence and Criminal Exploitation Affecting Children
- South Tyneside Safeguarding Adults Board Policies and Procedures, including but not limited to:
  - Adults in Specific Circumstances: Modern Slavery
  - Working with Historic and Current Adult Victims and Survivors of Organised Sexual Abuse
- South Tyneside Council Emergency Response Process and Action Cards
- South Tyneside Council Community Tensions Summaries

# Comprehensive Modern Slavery Plan

Local authority officers across a range of services have a number of roles to play in combating modern slavery. Although many services have responses in place to manage their functions, it is important that a strategic, coordinated approach is taken to maximise impact.

A number of frameworks are available to organise local authority activities and comprehensive strategies. The Government’s Modern Slavery Strategy uses the ‘4 Ps’ framework: Pursue, Prevent, Protect and Prepare. LGA guidance breaks council roles into four different areas: identification and referral of victims; supporting victims – including through safeguarding, meeting care and support needs, or delivering housing or homelessness services; community safety services and disruption services; and ensuring that the supply chains councils procure from are free from slavery.

For the purpose of this document, the LGA areas are taken as a model but further broken down so as to better explain distinctions between ‘response’ and ‘support’ and to give attention to the additional community engagement role.



## IDENTIFY

A wide range of frontline staff from across services – from customer services to social workers to refuse collectors - could encounter modern slavery as part of their day to day activity. It is important therefore that all such staff are equipped to be able to recognise the signs and to be able to confidently share any concerns.

| Actions         |   |
|-----------------|---|
| <b>IDENTIFY</b> | <p>Raise awareness of indicators of modern slavery with all frontline staff who may be in a position to recognise signs as part of their day to day work</p> <ul style="list-style-type: none"> <li>- Ensure appropriate training is delivered to social workers, as well as other frontline staff who may encounter potential victims as part of their daily work or to whom potential victims may disclose information</li> <li>- Identify and deliver basic training in spotting the signs of slavery to all frontline staff who may be in a position to recognise and report signs because their role brings them into contact with private homes and businesses where victims may live or work</li> <li>- Deliver training to all Elected Members who may be in a position to encounter and recognise indicators of slavery as part of their interactions with ward members</li> <li>- Share information on indicators of slavery with all staff through a range of communication mediums, including Staff News</li> </ul> |

|  |  |
|--|--|
|  | <p>Agree and communicate clear pathways for employees, residents and partners to report concerns and to share intelligence</p> <ul style="list-style-type: none"> <li>- Identify named leads who should be informed depending on type of contact (e.g. in case of intelligence shared by residents, employees/suppliers, police, other partners)</li> <li>- Provide training and clear scripts/pathways to contact centre and customer services workers who may encounter victims or residents with concerns</li> <li>- Ensure training is provided to relevant staff to support initial assessment of potential victims against Care Act 2014 eligibility and to undertake Human Rights Assessments where needed</li> </ul> |
|  | <p>Explore ways to develop a system for capturing, analysing, sharing and responding to 'soft' intelligence, both internally and in terms of multi-agency partnerships</p>   |

## RESPOND

Although Modern Slavery is a crime, and as such police should always be contacted in the first instance when concerns are first identified, the Council may have to respond in a range of circumstances, including if an employee identifies and reports an incident, if a victim or potential victim or witness makes contact with Council officers, or if partners, including the Police, make contact or request support following the identification of local victims. It is vital that the Council is prepared to respond quickly and appropriately to range of requirements when modern slavery is identified in the area or when concerns are raised.

The Modern Slavery, Trafficking and Exploitation Response Plan sets out the pathways to be followed in a range of circumstances. Work is ongoing to ensure the relevant officers with the potential to be the first point of contact in such cases are appropriately equipped to ask the right questions and provide necessary support and direction. Subsequent actions required of the Council may include provision of specific social care support, coordination of emergency housing, internal and external communication or management of community tensions; the MSTE Response Plan identifies and provides instruction to the teams who may be involved at this point.

| Actions |   |
|---------|---|
|         | Embed Response Plan, including with simulations and delivery of training for named teams as required  |
|         | Deliver training on the National Referral Mechanism for all staff who may encounter potential victims |

## SUPPORT

Modern slavery victims will likely need a range of support once they have been identified. Although some of these needs will be met by partners (e.g. health needs), depending on the circumstances of the case, victims may require assessment or support from Children's Social Care or Adult Social Care as well as emergency accommodation and welfare support.

**Actions**

**SUPPORT**

Deliver to all social care and housing staff who may be involved in responding to the care and support needs of potential victims appropriate training on how to work with and the rights of, and multi-agency support available to, potential victims

**DISRUPT**

Some teams, including those with powers of entry (for example, trading standards and environmental health) may have additional roles in working with Police to disrupt perpetrators.

It is important that these relevant teams are trained to understand how they can use their positions to aid in such cases, as well as how they can avoid accidentally hindering any potential future prosecution.

**Actions**

**DISRUPT**

Deliver training to relevant teams to ensure relevant officers understand how they might be called upon to support police disruption operations and how they can maximise evidence preservation and increase the chances of prosecution

**PREVENT**

Like all large organisations, the Council has a statutory responsibility, under s.54 of the Modern Slavery Act 2015, to take steps to ensure its business practices and those of its suppliers do not enable Modern Slavery. Each year, the Council is required to publish a publicly-available Modern Slavery Statement to ensure transparency in this area.

The Council’s Procurement, Commissioning and Human Resources teams have important ongoing roles in strengthening the Council’s business practices and supply chains against vulnerability to promoting Modern Slavery. These teams should continue to monitor and implement best practice approaches to ensure that Council employees and employees of partners and suppliers are not at risk of exploitative business practices or modern slavery.

**Actions**

**PREVENT**

- Engage Procurement, Human Resources and Commissioning senior managers to commit to proactive and ongoing efforts to eradicate slavery in the supply chain, including through the identification of a named officer in each service with responsibility for monitoring contracts, keeping up to date with best practice and reporting any amendments to practice to be included in the annual Modern Slavery Statement
- Develop and communicate clear expectations for all suppliers and providers which set out prohibited practices and minimum standards expected of suppliers or providers and consequences for failure to comply with minimum standards
- Explore opportunities to, where appropriate, build expectations relating to modern slavery into communications with suppliers, including literature supporting tender processes, contracts and contract management communications

|  |  |
|--|--|
|  | Undertake risk assessment to identify supplier industries, countries of origin or materials that are linked with high-risk of modern slavery and, where appropriate, engage with relevant suppliers to obtain enhanced information and assurance   |
|  | Strengthen internal communication of employer's rights and opportunities to raise concerns (including improved communication of the whistleblowing policy and channels through which to raise concerns if slavery is expected).  |
|  | Engage heads of services and managers across the organisation to understand their individual responsibilities and opportunities for mitigating slavery risks (including working with suppliers and providers through the established procurement system, and identifying opportunities for engaging with partners) |

## ENGAGE

The wider community of South Tyneside, including residents, businesses and partners, represent an important asset in identifying and protecting against modern slavery. The Council has an opportunity to raise awareness so that residents can better identify and report concerns and so that businesses can ensure they are not supporting modern slavery in their supply chains. The Council also has an important opportunity to engage with partners, including through Partnership Boards and other initiatives, to ensure optimal cooperation to identify and support victims.

| Actions       |   |
|---------------|---|
| <b>ENGAGE</b> | Complement national modern slavery awareness campaigns with targeted local approach <ul style="list-style-type: none"> <li>Reinforce national messages, including promotion of the national modern slavery website and helpline, as well as police emergency and non-emergency numbers and crime stoppers anonymous</li> <li>Develop and share relevant local information, including pathways to support local safeguarding concerns</li> <li>Share information locally including through information left at public sites such as community associations, libraries, doctors' surgeries, dentists and job centres</li> </ul> |
|               | Work with local private sector partners (particularly those in high risk sectors such as construction, car washes, nail salons) to raise awareness, share best practice in protecting business and supply chains against slavery and promote sharing intelligence   |
|               | Work with local third sector partners, particularly those who work with vulnerable populations, to raise awareness of indicators of slavery and reporting procedures  |
|               | Work with local faith groups and third sector partners with ties to foreign national, non-English-speaking residents to ensure information about rights and help available is well distributed among harder-to-engage populations   |
|               | Where possible, develop plans to engage with vulnerable populations, including homeless people, asylum seekers, refugees and adults with learning disabilities, to raise awareness of risks and signpost help available   |
|               | Explore options to engage other targeted networks to raise awareness of broader indicators of slavery, trafficking and exploitation (e.g. taxis and night-time-economy workers previously trained to recognise and report signs of child sexual exploitation)   |