



LSAB

Making safeguarding personal

Safeguarding Adults Review

Learning from the Experience of Large-Scale Modern Slavery in Lincolnshire

EXECUTIVE SUMMARY

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Date: Nov 2019

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1. Introduction

- 1.1. Under the 2014 Care Act, Safeguarding Adults Boards (SABs) are responsible for Safeguarding Adults Reviews (SARs).
- 1.2. A SAR *must* be conducted where an adult has died as a result of abuse or neglect or experienced serious abuse or neglect. A SAR *may* be conducted in any other situations where it is thought there is valuable learning for the partnership. It is on this basis that this SAR was commissioned.
- 1.3. The purpose of a SAR is to promote effective learning and improvement action to prevent future deaths or serious harm occurring again.
- 1.4. In all, twenty-two agencies from across Local Authority services, Health, Police, Probation, Housing and the voluntary sector contributed to the learning for this review.
- 1.5. The full details and learning from the review are available within the overview report <https://www.lincolnshire.gov.uk/lsab/safeguarding-adults-reviews/131855.article>. This Executive Summary offers key points of learning and recommendations.

2. Background Summary: Modern Slavery in Lincolnshire and Operation Pottery

- 2.1. In 2014, Lincolnshire Police commenced a major investigation into suspected labour exploitation by an organised crime group. The investigation was named Operation Pottery and concentrated on sixteen members of one family, referred to as Family A.
- 2.2. Police had been investigating the criminal activity of Family A. Family A were part of the traveller community and had exploited the mobile element of that lifestyle to recruit victims.¹ These victims all had vulnerabilities that Family A took advantage of in order to financially exploit, manipulate or intimidate into carrying out fraudulent criminal behaviour and forced labour.
- 2.3. Operation Pottery involved sixty potential victims and was carried out by a small team of Police Officers working with multi-agency partners. Much of the focus was on people living on two traveller's sites in Lincolnshire.
- 2.4. From Autumn 2014, the Operation Pottery investigation team began enforcement action, arresting members of Family A and simultaneously assisting victims to move to a Reception Centre where they were supported by professionals from the multi-agency partnership. Over the months that followed, further victims were supported to leave the control of Family A and to be referred through the Modern Slavery National Referral Mechanism (NRM)² to places of safety.

¹ The term 'victim' is used throughout this report in keeping with terminology used in legislation and guidance but does not diminish the strengths of those that experienced the modern slavery.

² HM Government: National Referral Mechanism for Adults: England and Wales
<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales> Accessed August 2019

- 2.5. In all, Operation Pottery lasted for two years. Of the sixty potential victims, twenty-two supported a prosecution. Of these, eighteen people were referred via the NRM and all received a Conclusive Grounds decision of trafficking. The other four victims had been victims of financial exploitation. It was this group of twenty-two that were the focus of the review.
- 2.6. The sixteen members of Family A were convicted of offences including conspiring to require a person into forced/compulsory labour, conspiracy to defraud, fraud by false representation, theft and assaults. Ten of the defendants received prison sentences totalling 90 years.

“You preyed on men who for a variety of reasons had fallen on hard times. Men who had become homeless, alcoholic, men with mental health problems. Men who for a variety of reasons, and to varying degrees, were vulnerable and easy to manipulate.....

It may be that society and government have been slow to wake up to this pernicious wrongdoing, but society and government have woken up....”

Judge’s Sentencing Comments

- 2.7. Operation Pottery was a major investigation of organised crime, resulting in successful prosecution of the perpetrators and the protection of those victims involved. This review focuses on the experience of those victims.
- 2.8. The review considered:
- The context in which the modern slavery occurred
 - The experiences of those who were subject to modern slavery, their views on the help they received and recommendations for change.
 - Whether agencies took opportunities to identify modern slavery
 - How well agencies worked together to respond to people subjected to modern slavery including their restorative care
 - How effective the multi-agency support was, during the process of reporting through the National Referral Mechanism process and beyond.
 - Good practice that was in evidence
 - Systemic factors that aided or presented barriers in making effective responses.
 - The gaps which victims fell through or were overlooked by agencies
- 2.9. The review sought to identify learning toward future responses to modern slavery. As well as highlighting the changes that had already been made, the review made recommendations for the Lincolnshire Safeguarding Adults Board and Safer Lincolnshire Partnership and to influence national policy and practice on Modern Slavery.

3. Experience of the Victims

- 3.1. The review considered in detail, the experience of four of the twenty-two victims. This enabled a fuller understanding of individual’s circumstances and a cross section of the issues involved whilst retaining proportionate parameters for the review.

3.2. The review greatly benefitted from direct interviews with three of these individuals who were willing to share their personal experience in order to try and help others. The following extracts offer some insights into their circumstances.

3.3. **‘Fred’**

Fred was a man in his sixties who had a mild learning disability. In the past he had been in work, had his own flat and was supported by a social worker. However, when Fred met Family A, he no longer had a Social Worker, was out of work and attending a drop-in centre for his food. It was at this drop-in centre that he was recruited by Family A who offered him work and accommodation.

Fred thought he was moving to a caravan site temporarily and would have paid work. What followed was fifteen years of working under the regime dictated to him by Family A. The caravan he was given had boarded up windows and no internal doors. He kept warm in a sleeping bag. There was no water or toilet. He used an outside tap and went to the toilet in the wood behind the site because there was no door on the site toilet.

Fred wanted to leave but was always watched and followed. Family A were with him when he collected his benefits and had his bank card and PIN number. Fred described being beaten many times by a member of Family A. *‘I got belted no end of times – they used to use fists or a hammer.’*

Fred worked for Family A doing various jobs. He was ferried about in the back of their windowless van. He came to the attention of Police on a number of occasions involving theft and rogue trader activities. This typically involved carrying out unsolicited work for older people who lived alone. Police reports from these incidents described Fred as appearing unkempt, dirty and thin.

Fred recalled being paid £20 a day on only two occasions, otherwise he was paid in tobacco or bought fish and chips.

On occasions he sustained work related injuries. He attended A&E when scrap metal went through his leg but didn’t feel able to tell professionals what was happening to him because Family A were with him.

Fred was also implicated in numerous incidents of suspected fraud with Family A.

- Money laundering by Family A using bank accounts in Fred’s name although Fred had no knowledge of the transactions.
- Fred was held liable for driving offences of vehicles registered in his name - he did not hold a driving license and Family A used the vehicles
- Housing Benefit was paid for a property where Fred claimed he was the resident – in reality he lived in dire conditions on the caravan sites.

On one occasion, Fred was arrested for growing cannabis – his caravan was being used for seedlings. He didn’t feel able to tell Police about his circumstances as Family A were also at the police station.

On the first of the Operation Pottery enforcement days, Fred was found at one of the traveller sites. He consented to go to the Reception Centre, received care and treatment and agreed to be referred through the NRM process. Fred was supported through a Registered Intermediary to give evidence that resulted in the successful prosecution of Family A. Fred decided where he wanted to be relocated. Police Officers supported him throughout.

Fred described how much his life has improved. He now has his own home in supported accommodation, has money and does his own shopping. He's gone to college to do gardening courses and loves to go and watch rugby and cricket. He has support from Social Care who oversee his package of care. However, four years on from being rescued, Fred remains deeply affected by his experience and still phones his link Police Officer most days.

'I'm glad [the police] turned up in the mini bus when they didI still am always looking behind me'

When Fred was asked what agencies could do to make a difference, he said he would like to see all agencies coming together and going to other places to get others away from them [Family A] as he knows it is happening to others.

3.4.

'Charlie M and Janet'

Charlie M and Janet were a married couple, living in their own property in another county. Janet had a mental illness and as a result was receiving regular support from a Community Mental Health Team Social Worker.

Family A visited the couple and befriended them, convincing Charlie M that they had known him in the past. Family A offered to *'help out'* by arranging work on their house, selling it on for them and *'get you into a nice tight community.'*

Charlie M and Janet signed their house over to Family A but never received any money from the sale of the house. Family A told Charlie M the house cost more to do up than it was worth and had been sold for a loss. Police later confirmed the house had been sold for over £60,000. The mortgage and debts relating to this property amounted to around £32,000, the balance paid into a member of Family A's bank account.

The couple moved onto the traveller site but the caravan was wholly unsuitable for their needs. Janet's Community Psychiatric Nurse (CPN) visited regularly though at times felt her visits to the site were controlled and manipulated by others. The CPN raised safeguarding adult concerns about possible financial abuse but the Local Authority Safeguarding Adult team had no records of receiving these referrals.

The couple were supported by the Local Authority Property Services and Borough Housing to move away from the site to their own flat. It was not until three years later, during an Operation Pottery multi-agency planning meeting that the circumstances of

Charlie M and Janet and concerns about their financial exploitation came to light.

A mental capacity assessment of Charlie M's ability to manage finances, found he had capacity but described him as *"... a trusting suggestible individual who remains vulnerable to exploitation or manipulation. He is likely to lack the confidence or ability to address the way others have a degree of control over him."*

Charlie M's reflections of living with Family A were *'They treated me nice right up until we were at [Site]. I got on OK. They were not threatening but would give me a warning....I didn't know about modern slavery at that time. It was like a community.'*

Janet and Charlie M are now settled into their new flat. The couple continue to need support from services to maintain their home, sustain their tenancy and to support Charlie M in his care of Janet.

3.5.

'Charlie K'

Charlie K was a man in his sixties who had learning difficulties. Following the death of his wife, Charlie K became very depressed and spent his money on gambling and alcohol. He lodged with his landlady but this relationship could be fraught with alcohol related incidents.

Charlie K recalled going to sign on in town. A white van pulled up and the driver (a member of Family A) said he knew him. Charlie K was offered a caravan and a job. He moved to one of the traveller sites and became involved in incidents of rogue trading on properties within Lincolnshire and other areas. Police video footage of unsolicited work on a property owned by an elderly couple shows Charlie K appearing cold, dishevelled, tired and very gaunt.

Charlie was living in a caravan in very poor conditions. He was provided with food but Family A took most of his benefit money and bank card – he had given them his PIN number due to fear of being hit. Charlie K recalled that on one occasion he was due a large benefits refund. A member of Family A took him to the Post Office *'he didn't even let the money touch my hand.'*

Charlie K worked a seven- day week. He never knew where they were going as he would be in the back of a windowless van. His pay would be a bottle of cider, tobacco or fish and chips. He didn't like the work they did on older adults properties. *'They used to take me out to other people's house. They'd pretend they were from the council and ask "do you want any work doing?" We used to take all the stuff up (drives etc.) Then they would ask for money for materials but they would not buy materials – they wouldn't go back'*

Charlie K described what it was like for him when he decided to leave and return to his previous landlady's house.

'It was at midnight – I opened the caravan door and saw that no-one was watching...

I'd had enough – how they were threatening me and not giving me what I wanted. I hadn't washed and had a beard. The next day three of [Family A] came in a van to [Cs] flat. The door-bell went – I didn't look out the window first and opened the door. Three of them just walked into the flat. [Family A] threatened to throw me through the window if I didn't come with him. He said "[Charlie K] come to the car I want to have a word with you" My heart was beating. Luckily my friend's daughter [R] was there. She came out and saw me crying in the back of the car and said "[Charlie K] come out of that car." We went to the neighbour's house and the neighbour phoned the police. The three [Family A] ran off. I told the police what had happened – that they had taken my car and they were making me do jobs. I asked them to help me get my bank card back but they said I would need to go back to [the Site] with them to do this – I didn't want to do that. They would twist everything and get off.'

Soon after Charlie K moved into Sheltered Housing Association accommodation in another county. At the time of the move, Charlie K had no belongings, just an old settee and table. There was a Housing Support Officer from the housing scheme whose role it was to sort out the benefits.

It was here that the Operation Pottery investigation team found him late in 2014, after the enforcement action had begun. He accepted a referral through the NRM and was assigned a Police Officer to support him. The Officer made a referral to Adult Social Care in the area where Charlie K had moved to but at that time, Charlie K did not require any help.

In 2017, Charlie K's Police Officer visited him. He was living in very sparse conditions and at point of eviction. The Officer established that Charlie K had large debts as he had not been signing on for his unemployment benefit. Signing on had been a very frightening experience for Charlie K. The Department of Work and Pensions office was in the centre of town. He would become very anxious if he saw any white vans as this triggered memories for him and fears Family A were out looking for him. It appears agencies in that area were not aware of his history as a victim of modern slavery

Charlie K's assigned Police Officer advocated on Charlie K's behalf with the Housing Association and DWP, liaising with his GP. This intervention successfully avoided Charlie's eviction and secured a backdated sum of £3000. Although in the past, Charlie K had struggled with alcohol and budgeting, he used this money to buy everything he needed for his flat.

Charlie K has now stopped drinking and lives in comfort in his own flat. He still maintains some contact with his assigned Police Officer.

'I've got my own place here, I pay my rent, pay my TV licence, I can go to the shops when I want, get a bus from here to do whatever I want, got me own key, got me own panic button if I ever fell, or stroke or heart attack or chest pains. I can't ask for more can I?'

3.6. For these four victims, their lives were turned around by the intervention of agencies. Sadly, for

some of the other victims, they continued to struggle with issues of addiction and homelessness. Some became involved in offending, for others contact has been lost or they have died.

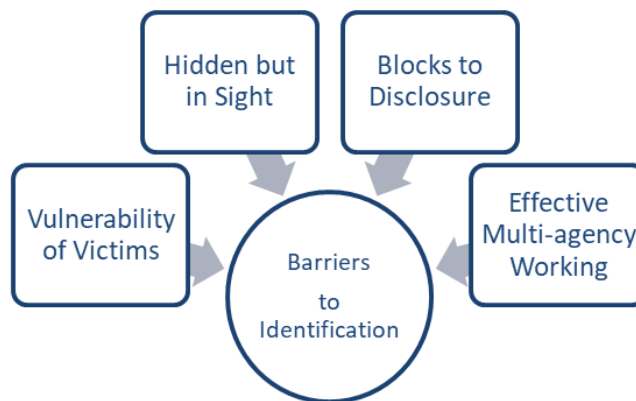
4. Summary of the Learning Points from the Review

The learning from this review is structured around three key stages:

1. Identification
2. Responses to the victims
3. Ongoing support and restorative care

4.1. Identification

4.1.1. The experiences of the victims demonstrated the significant barriers that victims have in breaking free from modern slavery.



4.1.2. Common to all victims was that their life circumstances left them vulnerable to exploitation. This was taken full advantage of by Family A. Common risk factors were:

- Marginalised, isolated and socially excluded
- Low self-esteem and troubled histories
- Impaired cognitive functioning due to learning disability or mental health needs
- Dependence due to homelessness and /or substance and alcohol addictions
- In poverty or having no control over their finances
- Immigrants who were dependent due to language, cultural literacy or control over passport

4.1.3. Some victims were helped to leave Family A, but then subsequently returned. This exemplifies the complicated picture for them – perhaps feeling trapped and powerless due to their circumstances, believing there were no alternatives or that they deserved no better.

4.1.4. Although there is no doubt the victims were vulnerable, by and large, the majority were just under the threshold of needing the active involvement of agencies and the added protection this would afford them. This was exploited by Family A and helped their activity stay below the radar of agencies.

4.1.5. These are known risk factors associated with modern slavery. Recognising these risk factors

alongside possible signs of modern slavery should direct professionals across agencies to be vigilant and use purposeful questioning to give opportunities for disclosure.

- 4.1.6. The victims did have some interactions with different agencies. At that time modern slavery was a relatively new concept and agencies reported this may have affected staffs' abilities to identify signs. Whilst this is acknowledged, financial exploitation; physical and psychological abuse were all used as mechanisms of control within modern slavery. Safeguarding Adult Board partner agencies were expected to have a good understanding of these aspects of abuse.
- 4.1.7. There were missed opportunities to refer safeguarding concerns. However, there were also many circumstances when even had professionals applied training, they were unlikely to have been able to identify victims of modern slavery. This highlighted the vital role that all agencies can play and the need to engage the eyes and ears of local communities to identify hidden victims.
- 4.1.8. Barriers to disclosure of modern slavery mirrored what has been learned about disclosure of domestic violence. Victims may not identify themselves as victims. They needed the opportunity to disclose in a safe place – there was learning about the need to use interpreters rather than accompanying 'relatives.' Disclosure is likely to need trust in others in order to cope with fear of reprisal. Victims will also need information to make informed choices and the prospect of a viable alternative.
- 4.1.10. Practitioners need to recognise the reasons a victim may partially disclose, retract or provide different accounts of their situation. The review highlighted some good practice examples where professionals demonstrated vigilance, sensitivity and tenacity in trying to support victims to disclose and be supported to break free.
- 4.1.11. There were also some examples of effective multi-agency working. However, responses to working with capacitous adults who were resistant to accepting support were not well developed. The impact of coercion and control was not always considered and weighed when making decisions about risks, consent and proportionate responses.
- 4.1.12. Processes and forums to share intelligence were also not well developed. This compromised the ability of agencies and the public to share low level or emerging concerns that would not meet referral criteria for Safeguarding Adult procedures.

4.2. Safeguarding the Victims – The Reception Centre

- 4.2.1. The Police Operation Pottery investigation team recognised the barriers to disclosure that victims faced. Setting up a Reception Centre for victims, while simultaneously arresting the suspected perpetrators was a highly effective means to overcome these barriers.
- 4.2.2. Planning for this enforcement and rescue action was an immense task for this team. The size of this work and dedication by the small team of Police Officers cannot be under estimated.
- 4.2.3. There was cohesive multi-agency work in planning and running the Reception Centre. The

meticulous planning, led by the Police, and the sensitivity and humanity provided by all was an exceptional response to victims. It is notable that the National Crime Agency stated that the Reception Centre was the best that they had seen. Victims interviewed for the review, highlighted how much they had valued having an assigned Police Officer. These officers remained with them, supporting them in those early days, throughout the lead up to Court and beyond.

- 4.2.4. The planning for the Reception Centre was managed under Gold Command. This provided an effective structure to bring agencies together and to allocate roles and resources. Those representing their agencies needed to have the necessary skills and knowledge, including safeguarding expertise, to be able to specify what their agency could contribute.
- 4.2.5. There was learning that a plan was required to follow on from this emergency planning phase. Victims were entitled to a forty-five-day period of support following a 'Reasonable Grounds' decision under the NRM. There was a need to identify the resources for different stages – immediate assessment and management plan; a more in-depth needs assessment when it was safe and appropriate to do so and then a longer- term plan – all with a lead coordinator.³
- 4.2.6. There was also learning about the management of records and communication of information. Planning for the Reception Centre had, by necessity been a tightly controlled, covert operation and records were held securely. However, it was not clear when these records could be shared and, as is noted in the following section, this impacted on the victims' aftercare.
- 4.2.7. The review also highlighted the significant impact on staff who were involved in the Reception Centre. Each agency had a duty of care toward their employees to de-brief from the emotional impact of this work.

4.3. Safeguarding the Victims – Restorative Care

- 4.3.1. The prospect of giving evidence in Court must have been incredibly intimidating for victims and required enormous courage. The Police provided an exemplary role in the support provided to the victims.
- 4.3.2. It was very challenging for staff from the different agencies to provide evidence due to the notoriety of Family A and fear of reprisals. There is a clear duty of care toward staff and a need for proactive managerial supervision to support staff to give evidence.

³ As now set out in the Survivor Care Standards.

Human Trafficking Foundation: The Slavery and Trafficking Survivor Care Standards 2018 Accessed June 2019
<https://www.antislaverycommissioner.co.uk/media/1235/slavery-and-trafficking-survivor-care-standards.pdf>

- 4.3.3. A Government review of the NRM⁴ has identified problems in each stage of the process including the quality and extent of support in the transition beyond the forty-five- day period of entitled support.
- 4.3.4. These problems were very evident for the victims of Family A. For many victims, there was a disjointed aftercare system with gaps in the support available at different stages and a lack of coordinated care that in some cases, put them at further risk of harm. There was heavy reliance on Police who continued to support victims and advocate on their behalf well beyond the point when Family A were convicted.
- 4.3.5. Police had notified relevant services in the areas the victims had been relocated to. However, many agencies reported that they had no information on their systems about the victims' history, or that the information that was held was limited. The impact of this, as exemplified by Charlie K's experience, is that agencies were not alerted to the additional physical and mental health needs of victims or their heightened risks of re-trafficking.
- 4.3.6. There is a need to provide coordinated, restorative care in the journey from disclosure through to recovery. Agencies needed to work collectively to share resources and agree additional measures in these exceptional circumstances. Victims needed coordinated care from the point of disclosure, through the NRM period and a seamless transition toward longer term recovery.
- 4.3.7. Notwithstanding this important learning, agencies should be applauded for their work and the difference they have been able to make in people's lives.

'What's life like now? After what I have been through, everything is fantastic. I can't thank [practitioners involved] enough. Nobody could have been better supported.'

Charlie K: Interview for the review

5. What has Changed?

- 5.1. In the years that have followed Operation Pottery, there has been a transformation in the responses to modern slavery and the resources available at national and local level.
- 5.2. The Modern Slavery Act 2015 has come into force and the Government announced a series of reforms to the NRM process⁵ These reforms, once implemented, should make a significant difference to many of the areas of learning highlighted in this review. However, the implementation is phased and it is important that the Lincolnshire partnership considers plans in the interim.

⁴ HM Government Guidance on the National referral mechanism reform (2018)
<https://www.gov.uk/government/publications/national-referral-mechanism-reform/national-referral-mechanism-reform>

⁵ HM Government Guidance on the National referral mechanism reform (2018)
<https://www.gov.uk/government/publications/national-referral-mechanism-reform/national-referral-mechanism-reform>

- 5.3. At a local level, agencies have worked hard to improve the level of awareness of modern slavery, supported by policies and procedures. The Police and Crime Commissioner has taken forward initiatives to raise awareness in communities and businesses with more work planned subject to funding applications. Multi-agency development work is led by the Safer Lincolnshire Partnership, involving agencies, communities and faith group in their strategy. However, implementing this strategy has been constrained by limited resources.
- 5.4. Agencies have also improved their information sharing mechanisms, having introduced a modern slavery intelligence sharing form. Police plans to establish an Intelligence Development Unit will strengthen their intelligence work on modern slavery and trafficking.
- 5.5. These developments are likely to make a real difference to people at risk of modern slavery but inevitably, the review has shown that more needs to be done.

6. Conclusions

- 6.1. The events covered by this review occurred at a time when agencies, communities and the public had limited knowledge of modern slavery.
- 6.2. The review has given some insights into the experiences of victims – people in very vulnerable circumstances who had experienced years of degradation and abuse. The review considered the many barriers that faced those victims in seeking help and breaking free from those that controlled and intimidated them.
- 6.3. The victims of abuse were hidden but in sight. The review found many examples where agencies missed opportunities to look beyond and make further enquiry. The review also found examples of good practice where agencies worked with tenacity to overcome the barriers to disclosure. The review also charts some exceptional multi-agency work, led by Lincolnshire Police, to bring the perpetrators to justice and the compassionate support provided to the victims during and following the Court process.
- 6.4. The review highlighted the significant weaknesses in systems that resulted in limited, poorly coordinated restorative care for many of the victims. For some of the victims, the actions taken and the support provided has transformed their lives. Others have not been so fortunate.
- 6.5. Much has changed in recent years and many of the systems failures have been addressed, or are due to be addressed at national or local level. However, much more needs to be done if agencies are to be able to prevent modern slavery and provide the support victims need to make a difference to their ultimate restoration.
- 6.6. The recommendations from this review aim to address this.

7. Recommendations

Each agency has made recommendations for their agency. These are detailed in the full report. The author has made some additional recommendations for the partnership.

Recommendations
Learning Theme 1: Awareness of Modern Slavery and Competence
<p>Recommendation 1 – A Competent Workforce</p> <p>The LSAB should seek assurance from partner agencies that their workforce holds the necessary level of competence in modern slavery. This should consider the different competence requirements of particular roles, recognising the higher levels of competence required in more specialist roles or where staff are working with groups or communities known to present a higher risk of modern slavery. The Safer Lincolnshire Together Multi Agency Modern Slavery Charter & Implementation Plan (draft) will be useful tool for assurance.</p> <p>The LSAB should review and revise their Safeguarding Adults training needs analysis and competence frameworks to ensure they adequately address Modern Slavery and the learning from this review.</p>
<p>Recommendation 2 – A Vigilant Community</p> <p>Businesses, community organisations, faith groups and the public provide a vital role in preventing and uncovering modern slavery.</p> <p>2.1 The Safer Lincolnshire Partnership should report to the LSAB on the implementation of the Modern Day Slavery Delivery Plan, specifically the elements of the plan that relate to raising community awareness and the efficacy of community facing intelligence sharing processes. This report should include timeframes set out in the delivery plan and any barriers to achieving the outcomes.</p> <p>2.2. Known risk factors and vulnerabilities to inform targeted communications that raise awareness of modern slavery and the support available to victims as highlighted within the report i.e. the locations presenting high risk and the vulnerability profile of individuals which may increase their risk</p>
Learning Theme 2: Responses to Modern Slavery and Restorative Care
<p>Recommendation 3 – Effective Information Sharing</p> <p>The Safer Lincolnshire Partnership should:</p> <ol style="list-style-type: none"> I. Evaluate the efficacy of the reporting form for Modern Slavery Human Trafficking and Modern Slavery Information Form and use of the Modern Slavery email address and use this evaluation to inform further development. II. Evaluate the availability of community safety intelligence sharing forums to establish if there is adequate provision across Lincolnshire.

III. Consider what recording systems and processes are required to share information regarding an individual's risk of Modern Slavery or their history as a victim, so to inform their ongoing care needs. Using learning from existing secure information sharing systems such as those used in Multi Agency Risk Assessment Conference (MARAC) will assist

Recommendation 4 – A Pathway for Responses to Modern Slavery

The LSAB in partnership with the Safer Lincolnshire Partnership should map out the multi-agency pathway for reporting and responding to modern slavery concerns and quality assure the multi-agency contribution at each stage. This will include the use of the Modern Slavery reporting form, information sharing forums; early intervention strategy discussions through to criminal investigations and Safeguarding Adult Section 42 Care Act enquiries.

Recommendation 5 – Safety and Support at Point of Disclosure

The PPB and SLP Strategy Board should ratify their arrangements for provision of a Place of Safety where adults leaving immediate situations of exploitation can be supported for 3 days while they decide on whether to enter the NRM and while awaiting a Reasonable Grounds decision.

The OPCC should finalise contractual arrangements for a service to provide case work care and support to those adults during this period.

This provision is an interim measure while awaiting the national implementation of this provision as part of the NRM reforms.

Recommendation 6 – Coordinated Multi-Agency Restorative Care

The LSAB partnership in collaboration with the Safer Lincolnshire Partnership should develop a mechanism and coordinate resources so that victims of modern slavery are offered coordinated multi-agency care from point of disclosure, through the NRM period of support and beyond the transitions to their longer-term recovery. The LSAB may wish to consider approaches such as Team Around the Adult to achieve this.

This provision may be an interim measure while awaiting the implementation of the national NRM reforms. The LSAB and SLP should use learning from the Local Authority pilot sites,⁶ as well as learning from this review in developing this work.

Learning Theme 3: Strategic Responses and Emergency Planning

Recommendation 7 – Multi-agency Guidance for Large Scale Modern Slavery Operations

The LSAB, in collaboration with Safer Lincolnshire Partnership, should use the good practice

⁶ These pilot sites are part of the NRM programme of reforms - Derbyshire is one of the pilot sites.

and learning from this review to develop multi-agency operational guidance and checklists for large scale modern slavery responses that could be incorporated into the countywide incident plan. The guidance should include:

- I. Strategic management of the operation including:
 - Roles and responsibilities of respective agency representatives
 - Commitment of resources required to coordinate victim care across the victims' restoration pathway (linked to recommendation 6)
 - Communication strategy within and between agencies
 - Management of restricted information including review of when restrictions can end so that information about victims can be shared to enable their care and support
 - Explicit consideration of safeguarding children and adults and involvement of safeguarding leads in Gold Command or other strategic planning structures
- II. Guidance and checklists that will aide coordinated, multi-agency support - in line with Making Safeguarding Personal and available to victims across their restoration pathway (linked to recommendation 6)
- III. Arrangements for the emotional and practical support to staff involved in the operation who may be called upon to give evidence.

Recommendation 8 – Capacity to Deliver Partnership Strategy

The SLP should review the capacity within the partnership to implement their Modern Day Slavery Delivery plan and the additional recommendations raised within this review. The SLP may identify additional resources are required, such as a dedicated project coordinator to add the necessary capacity to deliver on the plan and make a difference to potential victims.

Learning Theme 4: Using Learning

Recommendation 9 – Influence Organisational Change

The learning from this review should be disseminated across LSAB and SLP agencies and other relevant agencies and bodies such as Housing providers; MAPPA and third sector bodies for use in policy, service review and workforce development.

Recommendation 10 – Influence National Policy

The learning from this review should be shared with Home Office Modern Slavery NRM Reform Team and the office of Anti-Slavery Commissioner so that the learning can contribute to:

- Policy development and recognition of the resources required by localities to provide effective responses and coordinated restorative care.
- Use insights from the experience of victims to inform the Home Office modern slavery typology research and their communications activity.

- Highlight the need for national development of multi-agency operational guidance and checklist for large scale modern slavery operations – incorporating the Human Trafficking Foundation: The Slavery and Trafficking Survivor Care Standards 2018.



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Date: September 2019



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