



Original Article

Thinking Outside the Box: Developing Multi-agency and Multidisciplinary Partnerships to tackle Modern Slavery in England

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Abstract: This article explores different ways of understanding and therefore tackling modern slavery. It looks at the way police and anti-slavery partnerships seek to tackle modern slavery in England. Based on “bottom up research” it highlights a number of innovative responses including co-location of partners, tackling derived demand, enhancing the welfare of victims and promoting regulation and rights.

Keywords: human trafficking, modern slavery, police, partnership, human rights, labour exploitation

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Introduction

Modern slavery has been recognised as a key global issue.¹ The 2016 *Global Report on Trafficking in Persons (Global Report)* states that “no country is immune from trafficking in persons” (UNODC, 2016: 5), while the 2016 Global Slavery Index identified some form of modern slavery in 167 countries. In the same year, Theresa May stated that modern slavery “is the great human rights issue of our time, and as Prime Minister [of Britain] I am determined that we will make it a national and international mission to rid our world of this barbaric evil” (May, 2016).

The UK has introduced an array of policy that criminalise modern slavery seeking to protect victims and to prevent its occurrence (see for example Home Office and Scottish Executive, 2007; Home Office and Scottish Executive, 2009; HM Government, 2011; HM Government, 2014 and Modern Slavery Act 2015). Moreover it has charged various bodies with strategic oversight and others with operational practice. The policy goals are very broad and thus enable the agencies and professionals charged with implementing them considerable latitude in the methods they adopt and the way they collaborate to achieve shared as well as organisational goals (Knill and Tosun, 2012). Thus to understand how modern slavery policy is interpreted and delivered requires an examination of what happens on the ground. This article makes such a contribution.

This article is based on the premise that modern slavery is not a phenomenon that can be understood, and therefore tackled, solely as a crime. The article looks at ways in which police in England lead on criminal law enforcement in relation to modern slavery but work with allies within the public sector and with NGOs to identify and protect victims, to prevent modern slavery and to disrupt business activities that facilitate modern slavery. It explores the way other agencies may lead on areas such as human rights awareness and protection, ship inspections, minimum wage and tax payments, fire safety, housing standards, and labour laws and standards. Finally, it suggests that working in multi-disciplinary and multi-agency partnership presents opportunities to expand the range of strategies adopted and the outcomes that can be achieved.

This article focuses on these policy implementation partnerships, revealing that some police and anti-slavery partnerships in England are responding to the phenomenon of modern slavery in their locale by “thinking outside the box” of traditional police practices. It is “bottom up” research into modern slavery exploring different types of partnership relationships and discerning what kind of innovative responses are emerging.

¹ Modern slavery is the term used to encompass human trafficking, slavery, servitude and forced labour.

Four key themes emerged from analysis of the interviews. The first is enhanced effectiveness arising from the co-location of partners; the second relates to disrupting modern slavery by targeting facilitators through various legal restraints; the third is the use of welfare or well-being as a driver of anti-slavery initiatives, and the fourth utilises a regulation and rights based approach to tackling modern slavery.

Methodology

This article draws on empirical research undertaken with a number of police forces or anti-slavery partnerships in England, including Manchester, Hampshire, Kent, London and Peterborough. The qualitative research was designed to fill a gap in knowledge as there was little information about how the police responded to the crime of modern slavery in their local communities. While policy at a national level placed a responsibility on police forces to prevent modern slavery, to protect victims, to undertake criminal investigations, to help prosecute offenders, and to work in partnership to achieve these goals (HM Government, 2011; HM Government, 2014), there was little evidence about their practice on the ground. As a result, this research aimed to shed light on how police forces implemented national policy in their local settings. It had two key objectives. The first was to identify how the police tackled modern slavery which included how their responses developed over time. The second was to explore how police worked in partnership with other organisations to tackle modern slavery, which included the benefits and challenges of partnership working. As this research takes a “bottom up” approach to policy analysis, an important strand in interpreting the data was to tease out forms of working that were inventive and effective in achieving the policy goals. Another was to pull out different approaches to tackling modern slavery. In addition, by listening to the voices of professionals on the ground it was also possible to discern a more nuanced set of outcomes that reflected criminal justice, human rights and well-being goals.

The sample was purposive and selected because these forces or partnerships were developing innovative responses to modern slavery. Data was derived from interviews with professionals involved in Hampshire and Isle of Wight Modern Slavery Partnership, the Safer Peterborough Partnership during Operation Pheasant, Greater Manchester Police Modern Slavery Unit, the Modern Slavery and Kidnap Unit of the Metropolitan Police Service, and the Kent and Essex Anti-Slavery Coordinator. It is also based on interviews with non-governmental organisations (NGOs) such as *Rahab* and *Apostles of the Sea* who work in cooperation with police and anti-slavery partnerships.

Over the three-year period of this research, 36 interviews were conducted with the police (officers and civilian staff), and with their partners, including staff from NGOs

supporting victims, the Gangmasters Licencing Authority (GLA), the National Crime Agency (NCA), Immigration Enforcement, Local Authorities, and Fire Service staff. This article builds on findings from research on good practice and partnership working undertaken with the Modern Slavery and Kidnap Unit of the Metropolitan Police Service (Van Dyke, 2014).

The findings cannot be generalised across the police landscape but are illustrative. They document the development of practices on the ground in terms of: agencies working in partnership; expertise and powers that can be utilised; strategies or tactics that can be adopted, and more nuanced outcomes that can be achieved through challenging traditional ways of working.

Understanding the Problem of Modern Slavery

There are a number of ways of understanding the problem of modern slavery. Three key approaches provide the context for this article. The first is that modern slavery has been conceptualised as a crime and as a result requires a criminal justice response. The second is that modern slavery is considered to be an abuse of human rights, which requires victim protection and support to meet individuals needs to recover and to reintegrate back into society. The third is that modern slavery is linked to extreme forms of labour abuse and exploitation, and thus requires stronger regulation and enforcement of labour standards and the protection of workers' rights.

The criminal justice approach, is underpinned by the *UN Convention on Transnational Organised Crime* but particularly its accompanying *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children*, known as the Palermo Protocol. It has had a significant impact on how human trafficking as one form of modern slavery has been tackled. The 2016 UN *Global Report* points to a significant growth in the number of countries which have enacted legislation making human trafficking a criminal offence, from 33 in 2003 to 158 in 2016 (UNODC, 2016). The UK was one of the countries influenced by the Palermo Protocol and made trafficking for sexual exploitation a criminal offense in 2003, and all other forms of human trafficking were criminalised in 2004. In addition, the criminal justice approach was influenced by the 1930 *Convention concerning Forced or Compulsory Labour* which called for forced labour to be made a criminal offense. The UK finally responded to its obligations under the Forced Labour Convention in 2009. Thus, in the noughties, law enforcement was given the necessary legal framework to tackle a variety of slavery-like practices in the UK. Recently, the Modern Slavery Act 2015 consolidated all the existing offenses related to

human trafficking, forced labour and slavery under the umbrella term of modern slavery, and harmonised sanctions and support to victims of modern slavery (Brown, 2016).

A traditional criminal justice approach presumes there will be traditional criminal justice outcomes. These might include the number of: police investigations and operations, victims, offenders charged, prosecuted and convicted, as well as the scale of sanctions, for example the length of sentences or compensation paid. However, these outcomes are not necessarily achieved. For example, the UN Global Report (2016) states that the number of prosecutions and convictions for human trafficking remain low despite the increasing number of countries who have criminalised it (UNODC, 2016). In the UK, although an increasing number of victims have been identified, the number of prosecutions and convictions remain low (HM Government, 2014).

While the UN Office on Drugs and Organised Crime identified human trafficking as a crime, the Office of the High Commissioner for Human Rights (OHCHR) linked human trafficking to significant human rights abuses. He sought to frame a response in terms of human rights protection (Office of the High Commissioner for Human Rights, 2002). OHCHR promoted a more holistic policy agenda by stating: “[t]he human rights of trafficked persons shall be at the centre of all efforts to prevent and combat trafficking and to protect, assist and provide redress to victims” (ibid: 1). The human rights framework was embedded in the *Council of Europe Convention on Action against Trafficking in Human Beings* and influenced the UK policy response. Non-governmental organisations were funded, through contracts with the Salvation Army, to provide support to victims of modern slavery,² with statutory agencies providing particular services like medical care or long term support.

A human rights approach to modern slavery presumes human rights and welfare outcomes. These might include survivors being treated with dignity, being safe, having access to medical care and housing, and being empowered to make choices about their futures. In addition, victims may seek criminal justice outcomes which include the prosecution and conviction of those who enslaved them as well as compensation for unpaid wages and for the physical and psychological harm done to them.

The International Labour Organisation (ILO) has adopted a third approach to modern slavery through its emphasis on labour law. It has long recognised the phenomenon of forced labour, and sought to eradicate it based on improving labour standards and ensuring the protection of people vulnerable to labour exploitation. The ILO expected governments to take action which might entail education, regulation and

² The Salvation Army holds the Government contract for support for adult victims of modern slavery in England and Wales and sub-contracts the provision of services to 12 NGOs based in different geographical locations.

enforcement once their country ratified the Forced Labour Conventions Nos 29 and 105. The UK has introduced a number of laws, and agencies to implement them as a result of its obligations under the Forced Labour Conventions and in response to EU Directives aimed at protecting workers from unsafe or exploitative practices. The Health and Safety Executive, the Employment Agencies Standards Inspectorate, the National Minimum Wage Unit in HM Customs and Revenue (HMRC) and the Gangmasters Licencing Authority (GLA), now the Gangmasters and Labour Abuse Authority (GLAA),³ have a responsibility to promote compliance with Government regulations (Geddes et al., 2013). They also have powers to enforce them, through civil and criminal remedies. In the UK, the pressure group Focus on Labour Exploitation (Robinson, 2015a) has argued for greater use of regulation, monitoring and civil remedies to eradicate forced labour and this approach alongside multi-agency cooperation has been endorsed elsewhere (Braakman et al., 2014; Government of Netherlands, 2016; Radeva Berket, 2015). Outcomes for a labour standards and workers' rights approach to modern slavery might include compliance by employers, employment agencies and labour providers, workers' awareness of their rights and where to seek assistance if subject to abuse and exploitation, and a reduction in the number of people at risk of labour abuse and exploitation.

Partnership Working

Three different approaches to tackling the problem of modern slavery have been outlined above. These involve different actors and agencies who are charged with implementing the relevant policy responses. Thus professionals engaged in law enforcement, service provision and compliance with labour standards and regulations all have a role to play. However, evidence suggests that to be effective in preventing modern slavery, identifying and protecting victims, and investigating and prosecuting offenders requires cooperation between organisations focusing on the different approaches. Partnership working has been encouraged by regional and national policy. For example, Article 35 of the *Council of Europe Convention Against Trafficking in Persons* states: "Each Party shall encourage state authorities and public officials, to co-operate with non-governmental organisations, other relevant organisations and members of civil society, in establishing strategic partnerships with the aim of achieving the purpose of this Convention". The UK government's *Modern Slavery Strategy* makes numerous references to partnership working for both strategic and operational purposes. Examples include, effective partnerships at

³ The GLA became the Gangmasters and Labour Abuse Authority (GLAA) in 2016. GLAA has an expanded remit and additional powers.

local level between the police and NGOs and the Immigration Enforcement Team cooperation with the National Crime Agency to investigate and disrupt organised crime groups involved in modern slavery (HM Government, 2014). Multi-disciplinary cooperation is also pertinent in relation to forced labour and trafficking for labour exploitation because of the continuum of poor working conditions which mean the line between bad employment practices and modern slavery is not always clear (Government of Netherlands, 2016).

One advantage of multidisciplinary cooperation is that a wider range of powers is available to counteract trafficking. The Local Government Association (2017) in the UK suggests that cooperation between local authorities, the fire service, police and other agencies enhances their ability to identify, investigate or disrupt cases of modern slavery because of the additional powers available to multi-agency partnerships. For example, the Fire Service adds value because it can use its powers with respect to fire safety to access premises, and to help locate victims who might be accommodated in business premises or in multi-occupancy housing. Premises which might be used for exploitative purposes can be closed if they are found to infringe health and safety regulations. Moreover, Community Safety Partnerships that seek to tackle organised crime can draw on a range of council powers including Trading Standards, licensing, environmental health and safeguarding powers to reduce harm to local people (Local Government Association, 2015).

It is interesting to explore how commitment to collaboration translates into the creation and development of partnerships (Douglas, 2009). Evidence suggests effective partnerships are characterised by regular information sharing and communication, shared values, trust and respect for partners, willingness to work towards common goals, and clarity in roles and structures (Douglas, 2009; Carnwell and Buchanan, 2009; Coliandris and Rogers, 2008). In other words, partnership working requires front-line professionals to respect the skills and expertise brought by partners, to be willing to co-operate in joint actions and on occasion to innovate based on agreed goals. Collaboration also provides an opportunity to reshape roles and actions to incorporate the perspectives of partners. As we shall see enhanced well-being may be considered a positive outcome of police partnerships as well as better protection of workers' rights. Co-location of partners offers an organisational setting that enables partnerships to develop, in sometimes unexpected ways. This is illustrated in the discussion of the empirical research findings below.

However, partnership working is not straightforward. It can also expose tensions if organisational cultures and responses are found to conflict. For example, NGOs working with human trafficking victims were more willing to collaborate with specialist rather than local police officers because of the former's knowledge and empathic response

to victims. Moreover, police officers indicated that in joint operations with Immigration Enforcement (IE), they would ask IE staff to concentrate on offenders. This was because they felt IE focused too much attention on immigration status which would frighten victims and might hamper their willingness to share information or to seek help (Van Dyke, 2014).

It is NGOs, who aim to improve the lives of victims, who are more likely to be aware of how actions to identify and to protect victims can have adverse consequences and do more harm. As a result, they may be hesitant to be fully engaged partners. Such a concern was raised by Apostles of the Sea and is discussed below.

Having established the context in which police and anti-slavery partnerships operate in the UK, the next sections are based on the empirical research. The first explores the impact of co-location of partners and how this arrangement affected the understanding of the risk of modern slavery, the capacity to respond, operational practice and the range of outcomes that can be achieved. It is followed by a second section discussing partnership actions aimed at tackling those facilitating modern slavery. The third section describes the role NGOs can play in tackling modern slavery and in promoting welfare and well-being outcomes in anti-slavery partnerships. The final section explores the use of a rights and regulation approach as part of the toolkit of anti-slavery work.

Co-location of Partners: Access to a Wider Range of Powers, Intelligence and Tactics

One of the developments in policing responses to modern slavery is co-location of partners. People working in the Modern Slavery Coordination Unit in Greater Manchester and in Safer Peterborough Partnership referred to the enormous benefits brought about through co-location in terms of strategic and operational planning as well as operational delivery. Working in one place facilitated real time sharing of information and intelligence. Moreover, it meant the team had access to a wider range of data, including information from police, immigration and local authority data banks. It facilitated access to a wider range of powers and options for planning and delivering preventative, pro-active or re-active measures.

Co-location appeared to break down not just physical walls between agencies but also silo mentalities. It contributed to more varied approaches to dealing with a situation or an investigation because it brought into proximity people with different powers and perspectives who were working for a common purpose. For example, both civil and criminal remedies were available, and success could be measured in terms of safeguarding

and enhanced well-being as well as criminal justice outcomes. As a result, respondents stated that co-location enabled more effective, time efficient and joined up responses. However, there is no blueprint and the following two co-location examples varied in their structures, remit and responses reflecting local factors and local histories.

Greater Manchester Modern Slavery Coordination Unit

The Modern Slavery Coordination Unit (MSCU) is based in the headquarters of the Greater Manchester Police (GMP). Its genesis was Programme Challenger, Greater Manchester's partnership approach to tackling serious organised crime. The MSCU (undated) developed as an offshoot to focus attention on the crime of modern slavery which had been identified as an increasing threat. Programme Challenger and the MSCU entail co-location of partners who bring different perspectives, powers and expertise to the table. Initially the MSCU included staff from GMP, Immigration Enforcement, a Local Authority (LA) Tactical Lead and a Safeguarding Lead. At the same time, it was able to draw on other specialist staff or agencies linked to Programme Challenger, for example financial investigators, GLA, HMRC, and the NCA. In addition, it could invite the British Red Cross to participate in modern slavery operations because of its capability to support victims. However, it was acknowledged that the partnership lacked direct and consistent input from the voluntary sector. Additional funding enabled the MSCU to appoint a coordinator to facilitate an NGO network that could provide new insights and information to the MSCU and aid anti-slavery initiatives.

The ability of the MSCU to share information and pool its intelligence enhanced its capacity to identify possible victims of modern slavery.⁴ Moreover, it recognised its intelligence could be supplemented by information provided by a wider range of people. As a result, it facilitated peer to peer awareness training for front-line professionals who might come into contact with victims of modern slavery. By providing training rooted in their professional practice, the MSCU ensured professionals explored indicators of modern slavery in the context of their work, whether they were housing standards officers or immigration enforcement officers. The expected outcome was that professionals looked at situations in a different way and had a point of contact if they had concerns.

⁴ See information about potential victims of human trafficking referred by GMP to the National Referral Mechanism, for example, National Crime Agency (2017) *National Referral Mechanism Statistics - End of Year Summary 2016*.

We are giving them [housing standards officers] some key signs and symptoms to look for and if they come out of that property and have the instinct that something is not right there they report it to us (LA Tactical Advisor).

The MSCU could also invoke a wider range of powers to facilitate its work and achieve its objectives. For example, property was identified as a possible indicator of modern slavery. Having an LA Tactical Lead meant the Unit was able to call on fire service and housing officers' powers to enter properties, to talk with residents and landlords, and to use civil remedies where there were fire or safety concerns. It could achieve two outcomes, intelligence gathering and improved well-being. The Immigration Enforcement officer referred to his ability to make use of immigration remedies, which might include deportation of individuals or placing a re-entry ban on passports to stop individuals of concern from re-entering the UK as vulnerable persons who might be re-trafficked.

While the Unit had a common purpose, staff were also able to fulfil organisational objectives. Thus, the police referred to fulfilling key criminal justice aims: rescuing victims, ensuring they received protection and prosecuting offenders. The Immigration Enforcement officer hoped to fulfil immigration policy aims, for example reducing the number of foreign national offenders. The Safeguarding Lead referred to the importance of preventing victimisation and safeguarding those who were vulnerable or victims. The LA Tactical Lead suggested that the Unit might embrace other outcomes which related to well-being since criminal justice outcomes were difficult to achieve.

We have an ethos. We try to get a positive outcome. The reality with modern slavery is you don't necessarily get a prosecution as a positive outcome, because of the nature of the victims. They refuse to give evidence but obviously we still want to work with them. So, a positive outcome might be their living conditions might be improved. They have access to services around employee rights.

Thus, some anti-slavery interventions were described in terms of improving people's quality of life, access to employment rights, or ensuring compliance with health and safety regulations, for example, adequate ventilation and face masks in nail bars, rather than achieving a criminal justice outcome for them.

Another consequence of its cooperative intelligence gathering and operational practice was the identification of new forms of modern slavery. MSCU staff made reference to the organised nature of "sham marriages", sexual exploitation arising from illegal money debt, forced criminality linked to a debt burden, and trafficking of young people across country lines to sell drugs.

For example, based on local intelligence the Unit found a number of adult women were trafficked for sexual exploitation in brothels in the West Midlands as a result of borrowing money from illegitimate money lenders. The debt burden was used to coerce them to work in brothels and to keep them subject to exploitation as transportation and accommodation charges were added to their debt. The MSCU identified a regional organised crime group as responsible and was working with other agencies to develop further intelligence and an appropriate response.

It was the Unit's work, which joined up intelligence about young people missing from care, and young people being charged for drug offences in disparate locations that led them to conclude that traffickers were targeting vulnerable young people in Greater Manchester. According to the Safeguarding Lead, "they target children's homes, vulnerable young people, and then [they are] taken to wherever."

The MSCU acknowledged this local threat, whereby traffickers had found the means to recruit, facilitate the movement and exploit young people and were able to operate relatively unscathed because of a lack of intelligence sharing.

As the MSCU is part of Operation Challenger, the team operates at two levels. It seeks to identify and rescue victims and it looks for patterns in order to identify and tackle the organised crime groups involved in modern slavery.

It was interesting to note that based on the different kinds of exploitation, the MSCU identified different levels of organisation. Some were local and involved the same group in all elements from recruitment to coercion to exploitation, whereas others which were international suggesting linkages between different crime groups, based on a business model (Lee, 2011). A member of the MSCU team illustrated this network model with reference to sham marriages, which were based on the exploitation of vulnerable Hungarian women. The Hungarian Interior Ministry provided key information about the profile of the international operators.

It's not one organised crime group that's doing it all. So, you will have a facilitator who will almost be a recruiter ... who will target a specific demographic of victim. So, it might be people who won't be missed. Then you have another group who will facilitate the travel, whether its bus journeys—mini-buses across Europe into the UK, a bit more under the radar then it would be if you were coming in on planes. You then have a recruiter in the country of origin, obviously in this case it is England. Someone who will facilitate on a local level with the housing and the setting up of the actual Sham [marriage] (LA Tactical Advisor).

Having developed its capability to identify victims of modern slavery, and individuals or organised crime groups who were the offenders, the MSCU had to expand

the capacity of the GMP to respond. Hence it trained 40 tactical advisors and 120 victim liaison officers to support local operations. As a result, the MSCU can increasingly play a more strategic role while local officers with enhanced capabilities can take charge of operations.

Another key element of the MSCU's strategic response has been to raise the profile of modern slavery and simultaneously improve public awareness and engagement. Bi-yearly action weeks involve staff from GMP, Immigration Enforcement, Trading Standards, Local Authority teams, Fire and Rescue Service, HMRC, GLA and Non-governmental organisations who carry out joint actions. These include awareness raising events, harm reduction visits, and operations "to target the facilitators of modern slavery and identify vulnerable victims", with the press reporting the outcomes.⁵

Finally, the MSCU has begun to work with the private sector. They have used the strategy of tackling modern slavery in supply chains to raise awareness of how business practices may permit the occurrence of forced labour practices.

It is evident that the MSCU has taken a new and evolving multi-agency and multi-disciplinary approach to tackling modern slavery, suggesting that it recognises that it can be more effective if it draws on a wide range of powers and remedies, engages the community and private sector, and reflects on what works and what does not work. It can be seen as a case study that illuminates many of the approaches discussed above.

Safer Peterborough Partnership

The Safer Peterborough Partnership (SPP) has a different genesis. In part, it owes its structure to the way Peterborough implemented the 1998 Crime and Disorder Act. It established a Community Safety Partnership encompassing the police, the fire service, and the local authority who were tasked with improving community safety and well-being. Later the SPP decided to co-locate staff from different partner bodies and departments of the council to develop more effective engagement with the community. SPP was influenced, at the time of the research, by Operation Pheasant in East Anglia and the learning acquired from the investigation of trafficking for labour exploitation in Wisbech, Norfolk, which had entailed partnership working between the police, the council, GLA, and HMRC.

A number of key changes took place as modern slavery became incorporated into the business of the Partnership, and which staff said, "permeates our psychology". Firstly,

⁵ Operation Challenger Week of Action 7th to 11th March 2016.

modern slavery became an issue pertinent to how all staff conducted their work on their own or as members of a team. For example, an officer in the licensing team indicated that concern about human trafficking now affected how he performed his job particularly in relation to those employed in licensed premises. As part of his compliance checks, he enquired about the numbers of staff employed, characteristics of the staff and if they were employed legally and had national insurance numbers. He used his powers to try and ascertain if workers might be victims of modern slavery. He stated:

to date I haven't come across any signs of human trafficking involvement in licensed premises. However, being aware of it doesn't prevent me from promoting [awareness of it] as part of the duty of care through licensed premises.

Moreover, he was willing to utilise his role to facilitate other parts of SPP around human trafficking. "The human trafficking aspect from my side is small, ... but that doesn't prevent me from the knowledge I have and of linking with them [other people in SPP] and supporting them if there are any problems with a licensed premise". It also shifted how an issue was dealt with. In the Community Safety team awareness of modern slavery meant they behaved differently, for example when visiting a brothel. The focus switched from sexual offences and perhaps anti-social behaviour to concern about human trafficking and protecting women. Operations were more victim-centred rather than police-centred.

Because it is such a priority for police, everything about our work considers the effect of human trafficking. For example, a few weeks ago there was a case led by [a police officer] which looked into the potential use of a brothel where there was concern about human trafficking. Previously we would have gone the sexual offenses route. This is a brothel, we need to go in there and move quickly and look at the offenses but not at the impact on the victims regarding safeguarding (Community Safety officer).

The Partnership offered other options for safeguarding women and for disrupting possible trafficking for sexual exploitation. It also provided a more holistic response. This was illustrated with reference to a situation of forced labour in a local mini-mart. The immediate criminal justice response of arresting the owner was followed by a multi-agency visit to develop a more complex understanding of the situation and response. The multi-agency team included staff from the Fire Service, Housing Enforcement, Housing Needs, Community Safety, and Operation Pheasant. They said:

We attended together and looked at it holistically. We didn't just see it as one issue. There are so many issues that surround human trafficking not just the forced labour side. [There is] also the impact on living standards, the safety of people living there, the fire risk. If people are willing to enforce labour on someone, they are not going to be worried about the environment they live in. That's why, although we don't do it on a day to day basis, we all attended together.... there are different people with different backgrounds...looking at it from different backgrounds but all working together.

Moreover, different agencies brought different powers and legislative knowledge to achieve results.

We can use different kinds of legislation to combat it, and we start to look wider than modern slavery. If there are licensing issues, we will happily prosecute and use everything we can on the statute books to combat it and if we can't get them on modern slavery we can disrupt them via licensing or anti-social behaviour.

The Partnership enabled Peterborough to increase the cost and risk to those involved in modern slavery by prosecuting for other offenses if necessary or by disrupting businesses, for example by withdrawing a license for selling alcohol. In other words, they employed strategies aimed at derived demand (discussed below).

The Partnership also sought to build trust with local communities. It did so by appointing Community Communicators who between them spoke four languages and were thus able to engage more fully with community members and act as a conduit for information. It also developed "safety and welfare" visits which allowed the police and housing officers to develop relationships with residents over time and collect information. The police sought intelligence which might help identify criminality, in particular that occupants might be victims of forced labour or trafficking for labour exploitation, and which might lead to a criminal justice response. The housing officer sought evidence about well-being which might be determined by the conditions of the dwelling, number of occupants, level of income, and knowledge of and access to local services. Both partners wanted information in order to safeguard members of the community and enhance their welfare. Criminal justice, human rights and labour rights outcomes, thus evolved as a result of partnership working.

Other agencies were to be used to gather intelligence instead of only the police as in traditional practice. For example, fire officers who visited properties were encouraged to look at risks in a new way. It was not just the risk of 12 people living in a two-bedroom house, but it was what might lie behind this situation. This presented the opportunity to ask other questions or to seek assistance from other agencies.

Are they workers? Who do they work for? How are they being paid? Are they being paid enough? Can they afford to live? So, all of a sudden, we are looking at a different approach, we are looking at partners within local authorities, partners from HMRC and potentially the DWP ... So that Fire Officer has given us one location and his concerns but that is then taken out to the partners for further exploration (Community Safety officer).

According to a Community Safety officer, use of other agencies to gather intelligence makes better use of resources and expertise and can achieve a number of important outcomes. The partnership approach provided:

Opportunities for occupants in the address to get supported further, but also to show to our communities that we are dealing with this, ... which is more than putting a door in, arresting people, taking them to court and hoping to secure a conviction. We are approaching it very differently. Can we support the workers? Are businesses in line with the legislation? Are they ethically trading within our patch or our communities?

The SPP transformed working relationships between different agencies. According to a senior member of SPP, the Partnership meant “we know what others are doing, and we have agreed common goals”.

Moreover, it cut out duplication, and in times of austerity, he stated, partnership working made sense. It was more efficient as well as effective. Another benefit referred to was cross pollination, as partners brought different skills, perspectives and knowledge to problem-solving meetings. As he said, Partnership “stops us working in silos, in isolation...I can join up and see things from different angles”. This allowed them to tie information together, to agree objectives, and to ensure different partners did not compromise each other, particularly around investigations of criminality or modern slavery. In addition, the construction of information sharing agreements, principally in relation to data protection, facilitated more rapid exchange of information which meant more rapid outcomes could be achieved. Finally, the SPP allowed for more innovative responses to local issues, as “human trafficking is not going to be solved just by legislation and by enforcement teams”. “Thinking outside the box” helped make Peterborough a safer place and enabled the team to meet SPP objectives.

The evidence from SPP and MSCU indicates that co-location aided innovative multi-agency working which produced a number of outcomes linked to criminal justice including a better understanding of local threats, identification of victims and prosecution of offenders, but also the protection of human rights, and enhanced community safety,

awareness and well-being. In making comparisons it is clear that the SPP sought to make modern slavery a community safety issue rather than solely a police issue, mainstreaming modern slavery into many areas. Although also using awareness training, the Manchester case study was perhaps a more explicit and planned approach to joint operations and organised crime.

Tackling Modern Slavery by Disrupting Facilitators

The interview data revealed that strategies were being developed to reduce *derived demand*⁶ as such tactics would reduce the profit and increase the risk and cost to those engaged in modern slavery practices. One method of increasing the risk was to disrupt those who helped facilitate it by providing transportation and housing or by laundering money through their legitimate businesses. According to respondents, strategies aimed at facilitators may not end in the prosecution of those who were at the centre of a modern slavery organised crime group, but they could make it more difficult for the groups to operate. In other words, their strategies could create a more hostile environment.

For example, targeting housing could provide a lever to identify and disrupt modern slavery. The SPP found cases where accommodation costs were used as an instrument to keep people in situations of forced labour due to debt accrued. Thus, multi-occupancy housing became a focus of attention and led to a multi-agency response which could improve well-being through reducing exploitation from landlords or from a trafficking network.

The Manchester Unit also collated data arising from poor quality housing which was linked to data on organised crime and/or human trafficking. This intelligence led to a pro-active response where the Unit made use of a variety of powers to act against landlords in terms of health and safety concerns but also as possible facilitators of modern slavery.

We have got a network of private rented properties that are generating criminality right across the board. ... If we have a prosecution around modern slavery or if we have activity around organised crime, under the Serious Crime Act you have the offense of facilitation. So your acting as a facilitator to enable the

⁶ Aronowitz and Koning (2014) focus on strategies to reduce demand and explore means of addressing: (i) *direct demand* – strategies aimed at buyers of sexual services, and (ii) *derived demand* – strategies to influence those making a profit which include employers or managers of brothels, or those recruiting, transporting or facilitating the trafficking of persons for sexual exploitation. They refer to the ways in which governments, law enforcement agencies and community organisations have used different tactics to reduce demand including repressive measures, legislative measures, awareness raising campaigns and social and cultural measures.

crime to occur. So we are saying we will work with landlords, quite happily, to make sure the property is of a standard and is not being utilised for crime, but if it is then there are opportunities to look at, a whole enforcement regime to use against the landlord (LA Tactical Advisor).

The respondent referred to using both civil and criminal powers, for example closure orders or the Proceed of Crime Act respectively, but also to inviting other partner agencies, like HMRC or the Department of Work and Pensions (DWP) to investigate and make use of their own enforcement methods. This action could produce both criminal justice and welfare outcomes. It might lead to the prosecution of facilitators of organised crime which might also disrupt organised crime activities including modern slavery, and at the same time, intervention might improve the housing situation of tenants.

Landlords or estate agents as facilitators of trafficking for the purpose of sexual exploitation was identified as a concern, requiring local authorities or police to take action. One London respondent said:

We are seeing landlords in the area who aren't recruiting women nor are they recruiting the business, but they are letting out their properties, and know who they're letting it to, so they are making money. So they are not controlling but they are making money from this opportunity. And that is more a Council enforcement responsibility.

A different approach, devised in Kent and Essex, also intended to disrupt those seeking to engage in trafficking for the purpose of sexual exploitation. Police intelligence was used to identify brothels, and estate agencies which have rented these properties. Estate agents were informed of the use of the premises and were asked to investigate if the use of the property contradicted the terms of the tenancy agreement, and perhaps the interests of the landlord. The intention of sharing information with estate agencies, operating in the private sector, was to get them to take action and thus reduce sexual exploitation in the immediate area. However, if estate agents did not take action, the police, on a return visit, indicated they would use their powers to take action.

There was a brothel being run in a privately rented accommodation, through a High Street Estate Agents. We've known about the brothel for some time. ... We told the Estate Agents that the property was being used as a brothel, so not in line with the tenancy agreement. The second time we went in the location we still found it being run as a brothel. So we went back to the Estate Agents and asked them what will they do about it, as we are now looking at you for facilitating a property, knowing that it is being run as a brothel and you are failing to act upon it. Failing to look at the tenancy agreement and the clauses within it.

This can be viewed as action to tackle derived demand as described by Aronowitz and Koning (2014). The police are going after those that make money by facilitating trafficking for sexual exploitation. It can also have a preventive effect, at least in this local area, as it disrupts the use of property for sexual exploitation.

Another route taken by Kent and Essex was to pursue rogue businesses used for money laundering purposes and which facilitates an organised crime group involved in modern slavery. A multi-agency operation might not lead to a prosecution for modern slavery but might place the business at risk and raise its costs. For example, the HMRC might be the agency to follow up an operation and use its power to investigate wages and taxes, and impose sanctions.

Car washes were identified both as sites of trafficking for labour exploitation and money laundering.

For example they might have a number of car washes, we are watching a particular car wash owner and we can't pin anything on him, from a criminal offence point of view but we know money has gone in from this member [of an organised crime group] to there but has travelled through various systems to there, and somehow it [the money ends] ends up in his car wash, in his account. He is too small for us to go after but his business isn't so HMRC and DWP will be informed. Their taxes and accounts are not likely to be 100% accurate and they will not be able to justify it. We will let other agencies follow the trail that would be of interest to them. So, we are disrupting his business. Potentially penalising him through closing his business or through penalties, especially financial penalties. But other partners are taking that work. We are still watching and managing the organised crime group but that particular layer, that particular member is no longer a threat. ... So its recognising the layers or tiers of the organised crime group and bringing in the right partners, share the data we hold on them, and let them disrupt or eliminate some of these members using their powers when we do not have enough or a strong enough case to go to court, which is the traditional approach, ...to secure a conviction. Now it's about, let's disrupt, lets eliminate (Essex and Kent Anti-Slavery Coordinator).

Another group of facilitators were those involved in transportation, bringing migrants who are potential victims of modern slavery to destinations in Britain or taking victims to sites for exploitation within Britain. The Kent and Essex Anti-Slavery Coordinator referred to action being taken to investigate the companies that transported people from a number of Eastern European countries to Britain. While many of these businesses were legitimate in terms of meeting a demand for cheap transport for people who come to work in Britain or to visit family members, some have a criminal aspect.

These vans could be used to facilitate the transportation of vulnerable people to Britain who sought an opportunity for a better life and who may be at risk of modern slavery. Stopping vans to gather information from van drivers including their routes and destinations and from passengers about their plans, helped police build up a picture regarding the transport side of the modern slavery chain, and to take action based on intelligence.

What is evident is that some anti-slavery partnerships in England analysed the causal factors in the modern slavery chains and developed responses to tackle *derived demand*. They sought to weaken or disrupt organised criminal activity linked to modern slavery. While police may be one partner, other agencies also played a leading role in using their powers and sanctions to create a hostile environment.

Welfare and Well-Being Approach and the Role of NGOs

The research also identified what will be referred to as “the welfare and well-being approach”. In these cases, NGOs with remits to aid the welfare of specific groups of people, played the lead role. Police or other enforcement agencies acted as partners but not as drivers of action. It was the human rights approach promoted by OHCHR that underpinned this work. It was victim-centred, with the welfare and security of people at the heart of engagement with vulnerable groups. Two examples illustrate this approach. The first is Rahab, a Catholic charity that was set up to care for women affected by prostitution and human trafficking for sexual exploitation, and the second is the Apostles of the Sea, a Catholic charity that seeks to meet the needs of seafarers through help, support and advice provided by its chaplains or volunteers.

(i) Rahab is a long-standing charity working with women affected by prostitution or trafficking in West London. It developed a form of practice which provides support and friendship in order to aid women’s empowerment. Several years ago, as part of the European Communities Against Trafficking (ECAT), it worked with SC07, the specialist Modern Slavery and Human Trafficking Unit in the Metropolitan Police Service (MPS), on a pro-active and victim-centred approach to victim identification and protection. This approach was developed on the basis of joint visits prior to the ECAT Project where both partners could see benefits of collaboration. For example, the MPS could obtain useful intelligence about sites of prostitution which might be linked to organised crime groups. Moreover, they found Rahab was able to provide the support needed by victims during a police operation. Rahab, on the other hand, learned about flats or brothels, known to the police, which they could visit in safety and offer forms of support based around women’s preferences.

[SC07] could see the benefits of working in partnership. Because it's not our role to do intelligence gathering and we don't want to be intelligence gathers with the women, but at the same time we are aware that there's lots of information we come to know.... We might come to say we're really concerned about this flat can you look into it? Or does it match, do you have another piece of information as you're the police. And then... [Rahab] began working so when SC07 was doing an operation, we would provide support around that (Rahab worker).

The welfare model approach entails Rahab and SC07 officers undertaking a joint visit to a brothel with the police initially assessing risk. Together they seek to develop a relationship with the women they encounter. The aim is to enhance the women's safety and well-being by building trust with the police and a relationship with Rahab that can be ongoing and defined by their needs. This welfare visit approach is centred around the women who are seen by both partners as vulnerable.

These joint visits help Rahab start an encounter with women who may wish for support and friendship aimed at enabling them, over time, to have more choices about their future and more power to decide their future (ECAT, 2016). Empowerment is conceived by Rahab as more than the services offered to victims of human trafficking like medical care, accommodation, or help with work. It also has a personal component that is central to how Rahab functions.

...for women the feelings of guilt or dislocation that comes from their own value systems and their spiritual [beliefs], whatever that is, has to be addressed.

It is evident that Rahab operates in the context of the human rights framework promoted by the OHCHR (2002).

On the other hand, for the police, the joint visits provide an opportunity to assure themselves that women in brothels are not obvious victims by being underage or showing signs of being trafficked, or to use their legal duties to rescue and protect them where necessary.

...where we go in together, ... they will withdraw [a victim] and take her to the Sanctuary for a de-brief or interview, enter her into the NRM, look for other safe houses that are not in our area (Rahab worker).

The police also recognise they acquire intelligence about sites of sexual exploitation that might be linked to serious organised crime and that building a relationship with women working in off-street prostitution, based around their welfare

and safety creates trust. This might enable them to report crimes committed against them or to report concerns about other women they know.

Working in partnership means outcomes are not purely criminal justice in nature and measured in terms of operations, arrests and charges. Victim identification and the protection and support of vulnerable women are viewed as key measures of success.

(ii) Apostles of the Sea (AotS) became part of an expanding network of organisations that agreed to contribute to the Modern Slavery Partnership in Hampshire and the Isle of Wight. The Partnership (2016) was seeking engagement from the private sector in the form of Port companies and agencies as part of its plan to tackle modern slavery at sea. AotS brought awareness of an industry that included commercial shipping (containers and ferries) and established connections to seafarers and fishers who have been recognised as vulnerable to labour exploitation, forced labour and human trafficking (Surtees, 2014). With its remit to promote the welfare of seafarers, Apostles of the Sea also provided a worker/victim-centred approach to the Partnership.

In Hampshire, AotS recognise that they are in a unique position to identify seafarers who might be subject to poor and unsafe working practices or might be victims of modern slavery. They have this capability because they visit ships to provide practical, spiritual and welfare support to the crew. In this capacity, where the crews' interests lie at the heart of their engagement, they are able to build trust and gain an understanding of crew members' situations and experiences, including their living and working conditions.

While the day to day activities of chaplains and volunteers is to meet the needs of seafarers, AotS in Hampshire has provided support to seafarers identified as victims of modern slavery. In addition, it has shared information where concerns have been raised about the situation of seafarers. It may seek intervention by Apostles of the Sea at the next port, or contact the relevant authority, usually the Maritime Coastguard Authority, which has a range of powers to inspect, require remedies and to detain ships in port—all of which are powerful regulatory mechanisms.

The maritime industry is important to the Hampshire economy but is also as a potential site for the crime of modern slavery. Apostles of the Sea can operate as a set of eyes into a world that is behind locked fences and thus invisible to most people and outside the understanding of most police. Moreover, as in domestic work it is easier for employers to cross boundaries as work and home are in the same enclosed space, even though they are supposed to abide by the Maritime Labour Convention.

While AotS recognises the contribution, it can make to tackling modern slavery, it also acknowledges that their relationship of trust is fraught with difficulties as seafarers are dependent on their work to support their families who are often located across the

globe. Being identified as a victim can undermine their livelihood as they can be blacklisted from further work, or if identified can be seen as foreign nationals who are deported rather than treated as victims of trafficking.

The AotS can challenge the police dynamic and put the interests of the victim—the seafarer—at the centre of action. A criminal justice response may not be seen as the best or only remedy. Instead alternative options of voluntary sector engagement or regulatory action by the Maritime Authority may be invoked through multi-agency partnership.

Both NGOs illustrate how the “welfare and well-being” approach can be embedded in police or anti-slavery responses to modern slavery and thereby interweave human rights and criminal justice outcomes.⁷ This requires that partners value the principles and expertise that NGOs, much smaller organisations, bring to collaborative and multi-disciplinary actions.

A Rights and Regulation Approach

According to the ILO, forced labour or trafficking for labour exploitation are underpinned by inadequate labour standards or enforcement of labour regulations. As a result, regulatory action, and enhancing workers understanding of their workplace rights have been seen as effective remedies for tackling modern slavery. The interview data suggested that a ‘rights and regulation approach’ is being used in the UK.

The regulatory approach can involve a variety of different agencies including those protecting workers, for example, labour inspectors, health and safety inspectors, wage inspectors, as well as those ensuring businesses are compliant with tax regimes. It can entail the use of civil or criminal remedies to fine or prosecute those who do not comply with regulations in relation to provision of labour, pay, tax payments or health and safety requirements. Such enforcement activities result in decreased profit for those who seek to exploit workers, and defraud the government, and might also act as a deterrent to others.

This approach can involve awareness raising activities aimed at migrants. This strategy aims to reduce the occurrence of labour exploitation by informing migrants of their rights in respect of pay and working conditions, and indicate where they can seek help if they find themselves in situations of modern slavery.

The Gangmasters Licensing Authority (GLA) is one such body, in the UK, that has been given the power to combat labour exploitation through labour inspection

⁷ NGOs help ensure a balance is struck ‘between victims’ needs and the need to prosecute the crime’, for example see ATMG (2012).

(Robinson, 2015b). It was established to protect vulnerable and exploited workers in four sectors: agriculture, horticulture, shellfish gathering, and associated processing and packaging. Through GLA's remit to license business that supply labour to these industries, the government sought to prevent labour exploitation by ensuring workers "receive fair treatment, the pay, benefits and conditions they are entitled to" (GLA, undated). In other words, GLA was to operate on the basis of a "rights based approach," with its enforcement arm empowered to prosecute unlicensed labour providers. The GLA can also work in partnership with the police to prosecute employers or labour suppliers engaging in modern slavery practices. However, GLA's various civil remedies may be more effective, as its sanctions, like revoking a license, can be swift, unlike prosecutions which can be time-consuming and which take a long time to produce results. Having the power to request repayment orders would in the future make the GLA even more effective, as it too would provide a swift sanction to those engaged in exploitation but at the same time restore workers "right to a wage."

While GLA's key aim is to protect vulnerable workers and to prevent labour exploitation, it also has an interest in working with partners who may use their civil or criminal justice powers to prosecute employers or labour providers who use forced or trafficked labour. It has worked with a number of different partners to investigate cases of modern slavery, prosecuting offenders and helping compensate victims (GLA, 2016). The GLA illustrates how the innovative use of regulatory and enforcement mechanisms in partnership with the police may offer a more effective response to labour exploitation. Its action can lead to an improvement in labour conditions, reduce the profit accrued from modern slavery as a result of fines and other sanctions, and heighten the risk to all those engaged in modern slavery through criminal convictions.

A "rights and regulation" approach adopted in Kent illustrates how an anti-slavery partnership can utilise a variety of tactics which yield a multiplicity of outcomes. "Safe and Well Checks" have been used to target organised crime and protect the vulnerable. Police intelligence has identified some transport companies as having links with organised crime groups (OCG). This means their vans might be helping to facilitate exploitation in a business also linked to the OCG. As a result, the "Safe and Well Checks" were designed. These entail the police using their powers to stop vans carrying passengers from Europe—upon their arrival in England. This action provides an opportunity to obtain information that might add to the police intelligence picture, particularly in relation to organised crime groups, or to aid investigations by the police or by HMRC about possible offences. Therefore, these checks allow two partner agencies to gather evidence that can be used to tackle modern slavery through civil or criminal

remedies. These actions have the potential to tackle demand by heightening the risk for those involved in modern slavery as well as increasing their costs.

We stopped 72 mini-vans in 4 hours. Each mini-bus had on average between 8-10 passengers. All of them had employment or were coming to employment or were visiting family. You ask about family members, names, dates and contact details. It's always a 'brother'. But of those who have employment, the companies have been recorded by HMRC. To give you an example, one company, [who had a number of passengers working for them] their accounts were not accurate, they were paying their workers below the minimum wage and they were fined £35,000. That was a construction company. So that's [the outcome] for that operation where HMRC took away all of the details and looked at each and every name and details and see if it matches the company's records within their tax system. What essentially these operations have done is put a number of companies on the radar of the right departments (Anti-Slavery Coordinator).

The second outcome is to protect vulnerable migrants as these "Safe and Well Checks" have a workers' rights function. According to the Kent and Essex Anti-Slavery Coordinator, passengers are spoken to individually and separately by a multi-agency team who seek to inform them about human trafficking, indicators of risk, and where to obtain assistance if necessary. In addition, they learn about their rights at work. Simultaneously they are asked for information about their place of work which can be used to investigate compliance with labour and tax law.

We explain who we are, what we do, and what we would like from them. So we would say, ... [we want] to raise awareness of modern slavery and human trafficking. Think about where you are heading and when you do get to your destination think about some of the indicators that you can see on this leaflet. Or you tell them about the indicators if they cannot read or write. But also the HMRC are there ... They are not asking real personal questions but are asking appropriate questions like: who do you work for, what is your pay? How many hours do you work? Do you have a national insurance number? These are standard HMRC questions.

This awareness raising fulfils two purposes. The first is prevention where intelligence obtained by the police or HMRC can be used to prevent future labour exploitation by taking action against those exploiting migrant workers. The second is to help migrant workers reduce their vulnerability to exploitation by encouraging them to ask questions about their work environment.

So while we are doing some prevention we are also seeking to raise the profile, on recognise what is happening to you when you reach a destination. Do you know your rights? Are you being paid fairly? Is the company ethically trading?

There are a number of possible positive outcomes of the “rights and regulation” approach being used in Kent. Firstly, Eastern Europeans who are working in the UK have a better understanding of their rights and the kinds of working conditions and pay they should expect. Secondly, these interventions may prevent modern slavery. By giving people information about the indicators of modern slavery, in a language they understand, and with a contact phone number, it is hoped that workers can stay safe and well, by seeking assistance when necessary, Thirdly, based on its intelligence gathering during the “Safe and Well Checks,” the HMRC will use their regulatory powers to impose fines on businesses who are not paying minimum wages and thus deter them from exploitative practices. Fourthly the police are able to gather significant intelligence which enhances their understanding of risk around modern slavery. They have more information about businesses that may be engaging in dubious or criminal activity which can feed into more traditional policing responses to modern slavery, particularly where it is linked to OCGs.

The increasing number of victims of labour exploitation identified in the UK may be a reflection of a multi-disciplinary response to this phenomenon (see National Crime Agency, 2017). There is evidence that the GLA and other agencies are using their regulatory and enforcement powers to prevent labour exploitation, and to sanction those who engage in such practices. This may have a deterrent effect if coupled with police investigations leading to convictions. In addition, the risks to migrants, seeking work and a better life in the UK, may be reduced if their awareness of their rights are enhanced.

Conclusion

By taking an open and “bottom up” approach to this research, it was possible to discern how police and anti-slavery partnerships were collaborating in a multitude of ways. In some areas co-location of partners occurred which facilitated the development of a multi-disciplinary multi-agency response to modern slavery. Greater Manchester and Peterborough exemplified how co-location created for one purpose, to tackle organised crime and to promote community safety respectively, could be extended in respect of new risks. They illustrated how the regularity of communication and joint action, and access to wider powers helped develop more innovative and effective practices. In addition, co-located partners attributed importance to human rights and well-being outcomes which suggested a shift away from a focus on criminal justice outcomes. For example, in Greater

Manchester, staff in the MSCU sought to obtain a positive outcome, and where a prosecution was not always feasible, an improvement in living conditions, thus in well-being, might be. In Peterborough, the Community Safety Partnership referred to upgrading the housing of victims and vulnerable adults who had been trapped in unsafe or poor quality accommodation.

In other locations it was evident that partnerships were purposeful, but that purposes varied. Collaborations were undertaken to identify victims, to check on the welfare of vulnerable people, to gather intelligence, to disrupt the facilitators of modern slavery, to prevent modern slavery, to promote labour rights, and to protect and support victims. Some partnerships clearly occurred on a regular basis while others were more ad hoc or being trialled and tested for effectiveness. It was also evident that collaboration allowed police and partner organisations to interweave criminal justice, human rights and labour rights approaches in their practices. For example, multi-agency and multi-disciplinary teams were able to intervene in business practices that produced poor working conditions and to use civil and criminal remedies to tackle labour abuses, forced labour or trafficking for labour exploitation.

NGOs like Rahab and Apostles of the Sea provided a reminder that victims have to be at the heart of all responses as they have been subject to human rights abuses. These NGOs played a leading role in developing actions aimed at enhancing the welfare of victims and vulnerable adults and at empowering them. They made partnerships more balanced in their approach. However, they also drew attention to the possible conflict over what action was in the best interest of the victim.

Listening to practitioners also evidenced the use of a labour rights and regulatory approach that is normally seen as vested in a regulatory body like GLA. Kent's police and HMRC partnership sought to prevent forced labour by appraising Eastern European migrants of their rights, and by identifying employers who could be investigated for non-compliance with minimum wage legislation or tax regulations.

This "bottom up" approach also revealed that police and anti-slavery partnerships have looked at the specific local situation and thought "out of the box" to tackle slavery in the most practical and effective way they can. This has produced innovative responses. For example, the practical response to *derived demand* was neatly summed up by a senior SPP officer who stated: "... we use legislation not intended for human trafficking but used it creatively."

Moreover, it means underlying causes of modern slavery such as widespread abuse of labour rights, low paid and precarious work, the proliferation of unsafe housing and the vulnerability of children in care can be addressed. This has the advantage of disrupting current modern slavery practices, reducing future problems by changing the

environment in which slavery flourishes, and bringing benefits to vulnerable people who although exploited are not legally defined as modern slaves.

Finally, this article illuminates the thinking in the police and other agencies that challenge traditional working practices and leads to mutually respectful working relationships between professionals of different disciplines. Multi-agency and multi-disciplinary partnerships to tackle modern slavery will develop further and it is hoped that this article may make a small contribution to this process.⁸

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⁸ In October 2017, Her Majesty's Inspectorate of Constabulary and Fire & Rescue Service (HMICFRS) published their inspection report *Stolen freedom: the policing response to modern slavery and human trafficking*. The HMICFRS report highlighted the importance of effective partnerships for strategic and operational purposes but noted they were absent or patchy in some forces.

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