

<b>For Information</b>	
<b>Public/Non Public</b>	<b>Public</b>
<b>Report to:</b>	<b>Joint Audit and Scrutiny Panel (JASP)</b>
<b>Date of Meeting:</b>	<b>22<sup>nd</sup> February 2019</b>
<b>Report of:</b>	<b>Amanda Froggatt, Strategic Support Officer</b>
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<b>Agenda Item:</b>	<b>5</b>

## **Audit and Inspection Update**

### **1. Purpose of the Report**

- 1.1 The purpose of this report is to provide the Joint Audit and Scrutiny Panel (JASP) with an update on progress against recommendations arising from audits and inspections which have taken place during Quarter 3, 2018/19.
- 1.2 To inform the Board of the schedule of planned audits and inspections.
- 1.3 To provide further information on the area identified for further scrutiny as requested at the last JAS; Appendix 2 – Stolen Freedom – The Policing Response to Modern Slavery and Human Trafficking.

### **2. Recommendations**

- 2.1 It is recommended that the Panel notes the status of audits and inspections carried out over the last quarter.
- 2.2 That the Panel reviews appendix 1 and if required request further detail which will be reported at the next meeting.

### **3. Reasons for Recommendations**

- 3.1 To enable the Panel to fulfil its scrutiny obligations with regard to Nottinghamshire Police and its response to audits and inspections.
- 3.2 To provide the Panel with greater scrutiny opportunities and to reach more informed decisions.
- 3.3 To provide the Panel with the opportunity to shape the focus and data inputs for future HMICFRS inspections.

## 4. Summary of Key Points

### Audit and Inspection Action Updates

- 4.1 The actions referred to in this report are the result of recommendations made by Nottinghamshire Police's internal auditors and external inspectorates, including HMICFRS.
- 4.2 There are currently 0 actions which have exceeded their target date. There are 134 actions showing as 'at risk' of being off target i.e. they will exceed their target date in the next month.
- 4.3 There were 242 actions closed during this quarter.
- 4.4 Recent and forthcoming Inspections are outlined in the table below:

### Recent Inspection Activity

Date of Inspection	Inspection Area	Date Report Received	Final Grading	Status
October 2018	Unannounced Custody Visit	-	-	Report received, recommendations being managed through 4Action
October 2018	Biometrics Commissioner Visit	-	-	Awaiting report
December 2018	PREVENT Counter Terrorism	-	-	Awaiting report

### Forthcoming HMICFRS Inspections

Date of Inspection	Inspection Area	Status
No scheduled Inspections		

### Publications

Date of Publication	Inspection Area	Status
May 2018	Still no Place for Hate	Actions being managed through 4 Action
July 2018	Understanding the Difference the Initial Response to Hate Crime	Actions being managed through 4Action

October 2018	Joint Inspection of the Handling of Cases Involving Disability Hate Crime	Actions being managed through 4Action
November 2018	Policing and Mental Health Picking up the Pieces	Actions being managed through 4Action

#### 4.5 Recent and Forthcoming Audits

##### Recent Audit Activity

Date of Audit	Auditable Area	Date Report Received	Final Grading	Status
June 2018	MFSS Contract Management	July 2018	Limited Assurance	Report issued actions being managed through 4Action
July 2018	Collaboration – Strategic Financial Planning	September 2018	Satisfactory Assurance	Draft report issued
August 2018	Collaboration – Risk Management	-	-	Report to be issued
September 2018	Collaboration – Business Planning	-	-	Report to be issued
September 2018	Health and Safety	October 2018	Limited Assurance	Report issued, out for management comment
September 2018	Commissioning	November 2018	Satisfactory Assurance	Report issued, actions being managed through 4Action
November 2018	Core Financial Systems	November 2018	Satisfactory Assurance	Draft report issued out for management comment
November 2018	Firearms Licensing	November 2018	Satisfactory Assurance	Report issued actions being

				managed through 4Action
December 2018	GDPR	December 2018	Limited Assurance	Draft report issued out for management comment
December 2018	Late Time Levy	December 2018	Limited Assurance	Draft report issued out for management comment
January 2019	IT Strategy	-	-	Audit currently taking place

### Forthcoming Audits

Date of Audit	Auditable Area	Status
Proposed February 2019	Seized Property	Audit to take place 22 <sup>nd</sup> February 2019
Proposed March 2019	Partnership Working	Audit to take place 31 <sup>st</sup> March 2019
TBC	Review of DMS	Date not yet confirmed

### Overview of all ongoing actions from Audits & Inspections - Appendix 1

**Area Identified for further scrutiny:** Stolen Freedom – The Policing Response to Modern Slavery and Human Trafficking. See appendix 2 and accompanying presentation.

#### 5. Financial Implications and Budget Provision

5.1 If financial implications arise from recommendations raised from audits, inspections and reviews, these implications are considered accordingly. Where an action cannot be delivered within budget provision, approval will be sought through the appropriate means.

#### 6. Human Resources Implications

6.1 There are no direct HR implications as a result of this report. HR implications resulting from specific actions will be managed on a case by case basis.

#### 7. Equality Implications

7.1 There are no direct equality implications arising from this report.

## **8. Risk Management**

8.1 Some current actions involve the completion of formal reviews of specific business areas. It is possible that some or all of these reviews will identify and evaluate significant risks, which will then be incorporated into the Force's risk management process.

## **9. Policy Implications and links to the Police and Crime Plan Priorities**

9.1 Any policy implications will be subject to current policy development process.

## **10. Changes in Legislation or other Legal Considerations**

10.1 There are no direct legal implications as a result of this report.

## **11. Details of outcome of consultation**

11.1 Following receipt of a final audit or inspection report a member of the Governance and Planning team consults with the appropriate Lead Officer and other stakeholders to plan appropriate actions in response to each relevant recommendation, or to agree a suitable closing comment where no action is deemed necessary.

11.2 All planned actions are added to the action planning system, 4Action, for management and review until completion.

## **12. Appendices**

12.1 Appendix 1 - Overview of all ongoing actions from Audits and Inspections.

12.2 Appendix 2 – Stolen Freedom – The Policing Response to Modern Slavery and Human Trafficking – Presentation to be given.



## Appendix 1 - Overview of all ongoing actions from Audits and Inspections: February 2019

Audit/Inspection	Source Title	Date	Number of Actions	Number Open	Number Closed	Number on Target	Number At Risk	Number Overdue
Audit-Mazars	Implementation of DMS June 2016	June 2016	6	3	3	3	0	0
Audit-Mazars	Data Protection Act Compliance Oct 2016	October 2016	14	4	10	0	4	0
Audit-Mazars	Procurement Follow up Nov 2016	November 2016	9	0	9	0	0	0
Audit-Mazars	Core Financials Systems Assurance Dec 2016	December 2016	9	1	8	1	0	0
Audit-Mazars	HR Recruitment and Selection	January 2017	4	3	1	0	3	0
Audit-Mazars	Data Quality 2016/17	May 2017	4	0	4	0	0	0
Audit-Mazars	Risk Management	May 2017	7	1	6	1	0	0
Audit-Mazars	Fleet Management	August 2017	6	3	3	2	1	0
Audit-Mazars	Workforce Planning	September 2017	12	1	11	0	1	0
Audit-Mazars	Social Value Impact	July 2016	4	1	3	0	1	0
Audit-Mazars	Seized & Found Property	May 2017	11	9	2	0	9	0
Audit-Mazars	Counter Fraud Review	January 2018	25	5	20	0	5	0
Audit-Mazars	Procurement Follow up Sept 2017	September 2017	3	1	2	1	0	0
Audit-Mazars	Core Financials Follow up July 2016	October 2016	12	1	11	0	1	0
Audit-Mazars	EMCHRS Learning & Development Collaboration	August 2017	5	0	5	0	0	0

## Appendix 1 - Overview of all ongoing actions from Audits and Inspections: February 2019

Audit/Inspection	Source Title	Date	Number of Actions	Number Open	Number Closed	Number on Target	Number At Risk	Number Overdue
Audit-Mazars	Joint Code of Corporate Governance	November 2015	2	0	2	0	0	0
Audit-Mazars	Safety Camera Partnership	September 2017	4	3	1	0	3	0
Audit-Mazars	Commissioning - Community Safety	May 2016	5	1	4	0	1	0
Audit-Mazars	Implementation of Duty Management System– Follow Up	May 2018	5	5	0	3	2	0
Audit-Mazars	MFSS Contract Management	June 2018	4	4	0	4	0	0
Audit-Mazars	Commissioning	2018	3	3	0	2	1	0
Audit-Mazars	Corporate Governance	2018	4	4	0	2	2	0
Audit-Mazars	Firearms Licensing	2018	4	4	0	0	4	0
Inspection-HMIC	Nottinghamshire Police's approach to tackling Domestic Abuse (local report)	March 2014	14	1	13	0	1	0
Inspection-HMIC	Welfare of Vulnerable People in Custody	March 2015	8	1	7	0	1	0
Inspection-HMIC	Efficiency Nov 2016 'Hot De Brief' actions	November 2016	31	4	27	2	2	0
Inspection-HMIC	Legitimacy 2016	December 2016	10	1	9	1	0	0
Inspection-HMIC	Effectiveness 2016	March 2017	10	1	9	0	1	0
Inspection-HMIC	Neighbourhood Strategy	2018	16	15	1	15	0	0
Inspection-HMIC	Efficiency, Legitimacy and Leadership Hot Debrief 2017	May 2017	9	2	7	0	2	0



## Appendix 1 - Overview of all ongoing actions from Audits and Inspections: February 2019

Audit/Inspection	Source Title	Date	Number of Actions	Number Open	Number Closed	Number on Target	Number At Risk	Number Overdue
Inspection-HMIC	Making it Fair: Disclosure of unused material in volume Crown Court Cases	July 2017	6	4	2	1	3	0
Inspection-HMIC	National Child Protection 2015	August 2015	8	0	8	0	0	0
Inspection-HMIC	Stolen freedom: the policing response to modern slavery and human trafficking	October 2017	7	2	5	0	2	0
Inspection-HMIC	PEEL Effectiveness 2017	September 2017	23	7	16	0	7	0
Inspection-HMIC	Additional PEEL Efficiency, Legitimacy, Leadership Actions 2017	2017	7	6	1	0	6	0
Inspection-HMIC	Progress Report on Domestic Abuse	Jan 2018	2	2	0	0	2	0
Inspection-HMIC	Hate Crime Thematic	2018	15	15	0	15	0	0
Inspection-HMIC	PEEL Legitimacy inc Leadership 2017	2017	4	3	1	0	3	0
Inspection-HMIC	PEEL Vulnerability Re Visit 2017	2017	9	8	1	0	8	0
Inspection-HMIC	PEEL Effectiveness National Report	2018	3	3	0	1	2	0
Inspection-HMIC	PEEL Efficiency 2017	2017	5	5	0	0	5	0
Inspection-HMIC	Unannounced Custody Inspection	2018	81	81	0	41	40	0
Inspection-HMIC	Crime Data Integrity	2018	18	18	0	10	8	0
Inspection-HMIC	Understanding the difference-The initial response to Hate Crime	2018	27	11	16	11	0	0
Inspection-HMIC	Still no place for hate	2018	6	6	0	6	0	0
Inspection-HMIC	Policing and Mental Health	2018	3	3	0	3	0	0
Inspection-HMIC	Joint Inspection of the handling of cases involving disability hate crime	2018	4	4	0	4	0	0
IPCC	Use of Force Report	September 2016	15	2	13	0	2	0
IPCO	IPCO Inspection	December 2017	2	1	1	0	1	0



## Appendix 2

### Stolen Freedom – the Policing Response to Modern Slavery and Human Trafficking

In 2017 Her Majesty's Inspectorate of Constabulary and Fire and Rescue Service (HMICFRS) undertook to examine how police in England and Wales were tackling modern slavery and human trafficking crimes, including using their powers and provisions set out in the Modern Slavery Act 2015. Having interviewed national leads from different agencies, examined a wide range of documentation and data, and assessed operational practice in police forces, regional organised crime units (ROCU) and within the National Crime Agency (NCA), the outcome was the publication of 'Stolen Freedom – the Policing Response to Modern Slavery and Human Trafficking', and a series of recommendations outlined below.

This is Nottinghamshire Police's response to all the recommendations. In December 2017, HMICFRS visited the force and examined the force's approach to Slavery. HMICFRS agreed to close down six of the recommendations, noting the force was still progressing the recommendation relating to compliance with the National Referral Mechanism (NRM) process.

### Recommendations

**Within twelve months, forces should review their leadership and governance arrangements for modern slavery and human trafficking, to ensure that:**

- **senior leaders prioritise the response to modern slavery and human trafficking;**
- **every incident of modern slavery identified to police is allocated appropriate resources with the skills, experience and capacity to investigate it effectively;**
- **forces develop effective partnership arrangements to co-ordinate activity in order to share information and safeguard victims; and**
- **performance and quality assurance measures are in place to allow senior leaders to assess the nature and quality of the service provided to victims**

The force's strategic lead is Assistant Chief Constable (ACC) Protective Services and the Superintendent (Director of Intelligence) is the tactical lead, who report into a regional strategic governance group headed up by Deputy Chief Constable (DCC) East Midlands Special Operations Unit (EMSOU). This group sets the regional strategy and 4 x Ps (Prepare, Prevent, Pursue, and Protect) plans that are adopted and managed by the 5 forces.

The force also reports into the Nottinghamshire Anti-Slavery Partnership who also have a strategy and, in turn, are accountable for delivery through the Safer Nottinghamshire Board.

The Modern Slavery (MS)/ Foreign National Offender (FNO) team comprise of a Police Sergeant and 4 officers who are experienced in dealing and developing intelligence and investigations of modern slavery. Members of the team have also attended the National Modern Slavery Advisor course and regularly provide direct advice and guidance to support front line officers. There is also an analyst that supports the Modern Slavery team on an ad-hoc basis.

All intelligence is allocated, reviewed and developed by the Modern Slavery team. The use of static surveillance has increased due to the nature of the jobs which is supported by the Intelligence Development Unit. Intelligence that develops into investigation stage is submitted to 'Tasking' for appropriate resources to be allocated. The team also receives referrals from other agencies (National Referral Mechanism (NRM)) and Modern Slavery Helpline.

The majority of MS (Modern Slavery) investigations are triaged by the MS team. NRM forms are quality assured by the team and there is on-going training provided to all Custody staff from Detention Officer to Inspector to ensure Association Criminal Records Office (ACRO) checks are completed and Potential Victims are Trafficking (PVOT) are identified at an early stage.

The MS team have also completed a 'First Responder's Guide to MS' which has been circulated to all frontline officers and guidance has previously been published. A refresh of the Intranet is also underway.

All Police submitted NRMs with a footprint in Nottinghamshire are copied back into the International Liaison inbox from the National Crime Agency (NCA), the same applies for NRM's from other agencies if they are first responder. These NRM's are then forwarded to the team and crimed accordingly, triaged by the Detective Chief Inspector within Intelligence (DCI).

Future changes in NRM shouldn't have any major impact on this process, but will assure we are well trained by the regional SPOC (Harry Dick) once these changes are implemented. It will also ensure we are consistent with other forces too.

The vulnerability to crime statistics was in the criming of MS/1 referrals (MS/1 forms are referrals from Police/Agencies where the victim doesn't want any support or doesn't want their details recording formally). These were being sent to a different email address in Nottinghamshire Police, but these are now all sent into the International Liaison inbox too, and follow the same triage/scrutiny as the NRM forms.

NRM changes around length of time support is offered etc. are yet to be communicated widely, or finalised, but we will ensure we have a thorough understanding of this, and then ensure relevant points are communicated to all staff.

Contact details, support numbers, and NRM processes as well as crime recording requirements are all mentioned in the recently published and distributed Modern Slavery First Responder Guide.

There were due to be an additional 6 members of staff to join the team (mixture of Police Constables (PCs) and Detective Constables (DCs)) and the MS team would transfer under the management of the Public Protection department. Due to other force resourcing requests, the target date for this is now the end of 2018. Detective Superintendent Fuller will remain as the Force Tactical lead when it transfers to Public Protection.

All modern slavery investigations are now triaged by the team who will either have ownership of the investigation or provide tactical support to the front line officers attending the early stages of investigations. All NRM forms are quality assured by the team and training for frontline officers, Custody and Detention Officers is on-going.

Partnership arrangements remain strong and good practice has been shared from Regional, National meetings and conferences that managers and practitioners have attended.

**Within six months, forces should have in place active information-sharing agreements with other agencies to facilitate speedy exchange of intelligence and in order to safeguard victims better and to identify suspects as early as possible**

There are a network of partners committed to supporting Modern Slavery, including numerous Non-Government Organisations, third sector providers, voluntary organisations, faith groups and academia. All these organisations have signed a pledge to make Nottingham and Nottinghamshire slavery free. Governance across the partnership is provided through the Anti-Slavery partnership chaired by the Chief Executive of Gedling Borough Council. There is open dialogue and constructive sharing of information at these forums in line with existing Information Sharing Agreements. The force's Modern Slavery and Human Trafficking Team (MSHT) works on the basis of 'need to share' and has established a network of key partners that provide mutual assistance where all but the most sensitive information is shared. An example of good practise is the pilot project being developed by the force on Nottingham City Council which apply the MARAC approach to the highest risk cases and where key partners attend to share information on both victims and perpetrators, and agree a common approach to tackling these case

**Immediately, forces should ensure that all victims carrying out criminal acts under compulsion attributable to slavery or exploitation are afforded the protection of early and continuing consideration of the applicability of the section 45 defence**

This relates to persons committing offences whilst being a Potential Victim of Trafficking (PVOT). The force is fully aware of the section 45 defence and factors it into investigations and intelligence development. This is also part of training and awareness for investigators.

This defence has been incorporated into the Year 2 probationer training; which has been taught to all cohorts in the last year or so.

It also forms a major part of the now completed training inputs into the Custody Suite staff on their training days. Following interview, there should be consideration given to the section 45 defence if the suspect outlines that they are being forced to commit a crime/working off a debt, with a specific focus on foreign national offenders, and their vulnerability.

*Recent use of the defence-*

August 2017, OP VASTIDITY;

Several Vietnamese nationals were recovered over a 3 day period from a huge industrial cannabis grow in Basford. Initially, the response was to arrest these persons for cultivation of cannabis; however, our team liaised with the investigation team, and prevented any further arrests for this, as they were clearly victims rather than offenders. The 3 initial arrests were released and supported into the NRM without a suspect interview, and were treated as witnesses/victims. Seven persons recovered in total, all placed into the NRM. Four Juveniles, three Adults.

**Immediately, forces should take steps to ensure they are fully compliant with the NRM process as it evolves and are implementing the requirement placed upon them under the Modern Slavery Act 2015 to notify the Home Office of any individual suspected to be an adult victim of modern slavery or human trafficking**

There has been extensive training around this and all NRM forms are quality assured by the modern slavery team as they are initially submitted to the Intelligence Management Unit.

We are aware of future developments of the NRM process and will be in a strong position to implement the new process.

All Police submitted NRMs with a footprint in Nottinghamshire are copied back into the International Liaison inbox from the NCA, the same applies for NRM's from other agencies if they are first responder. These NRMs are then forwarded to the team, crimed accordingly and triaged.

Future changes in the NRM shouldn't have any major impact on this process, but we'll ensure we are well trained by the regional spoc (Harry Dick) once the changes are implemented. We'll also ensure we are consistent with other forces too.

**Immediately, forces should take steps to ensure they fully comply with national crime recording standard (NCRS) requirements for offences identified as modern slavery and human trafficking and that sufficient audit capacity is available to the force crime registrar to provide reassurance that each force is identifying and managing any gaps in its crime-recording accuracy for these types of offences**

All incidents of Modern Slavery are recorded as per the national crime recording standard (NCRS).

Dip testing is also regularly undertaken by the Force Crime Registrar to ensure the force is fit for purpose.

A visit by HMICFRS (Crime Data Integrity Inspection) on 30<sup>th</sup> May 2018, acknowledged this was being adhered to and compliance was good. Officers and staff are aware of their obligation under National Crime Recording Standards. Crimes are also reviewed by Senior Managers to ensure compliance.

**Immediately, forces should ensure that allegations or indications of modern slavery and human trafficking are thoroughly investigated and effectively supervised by teams and individuals with the skills and experience to undertake them (this should include the use where appropriate of joint intelligence teams and other means to obtain intelligence and evidence from agencies overseas)**

All investigations, allegations and indications of Modern Slavery and Human Trafficking are thoroughly investigated. Ownership and resourcing of these allegations are also discussed within the Force Tasking process. In all cases, safeguarding is completed, victims are removed from the situation through the National Referral Mechanism (NRM), investigations triaged and full research is undertaken, including overseas checks.

All investigations which require a Professional Investigator and additional resources are submitted to Force Tasking for allocation. Dynamic investigations are also discussed through the force Daily Management Meeting process.

Since April 1<sup>st</sup> (this financial year) 54 crimes have been recorded. This has been a significant increase on last year of around +500% year to date. This figure incorporates 61 NRM's in that timescale. It should be noted not all NRM's attract a crime number if offences have occurred overseas.

In 2017/18 Nottinghamshire Police received 524 intelligence reports relating to modern slavery compared with 243 in 2016/17. There were also, 76 crimes recorded over the same time period compared with 13 in 2016/17. There were also 76 NRM's.

**Immediately, forces should review their use of preventative powers under the Modern Slavery Act 2015 to ensure that opportunities to restrict the activities of those deemed to pose a clear threat to others in respect of modern slavery and human trafficking offences are exploited.**

The force remains committed to seeking Slavery and Traffic Risk Orders (STPOs) upon conviction, for all successful prosecutions and now have a number in place that are being monitored by the MSHT Team. Unfortunately, very few of the investigations achieve a criminal justice outcome so the numbers of STPOs will be low.

The force is now focusing energy on the STPOs, which are being used more regularly across the UK when it is unlikely to achieve a successful outcome from a criminal investigation. The regional Modern Slavery Transformation Unit lead, Detective Inspector Harry Dick, is currently engaged with Legal Services who have responsibility for presenting these cases in court. The force's MSHT lead has now met with the leads for Child Sexual Exploitation, County Lines, Missing Persons and drugs to promote the use of STROs, and the first one is now being planned in relation to Operation Glaciate (organised Child Sexual Exploitation in Nottingham). The standards of investigation to achieve a STRO is as high as any criminal investigation, but both can be run in parallel.







# Tackling Modern Slavery in Nottinghamshire

Presentation to the Joint Audit and Scrutiny Panel – 22<sup>nd</sup> February 2019



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# PURPOSE

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To provide an overview of Nottinghamshire Police's approach to tackling Modern Slavery and Human Trafficking in the county, and specifically to update progress in delivering the recommendations of HMICFRS as set out in their report, "Stolen Freedom, The Policing Response to Modern Slavery and Human Trafficking" (2017)

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# NATIONAL CONTEXT

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- Estimated that 13,000 slaves in the UK
- International crime that affects nearly 46 million globally
- Assessed as the second largest organised crime industry in the world
- Subject to significant government focus with the Prime Minister, Theresa May, describing it as, “the greatest human rights issue of our time”.
- Political economic and cultural crime
- Substantial changes delivered reflecting national focus – legislation, Commissioner’s officer, national Transformation Unit, National Referral Mechanism, Duty to Report requirements and extensive mobilisation of partners

## **BUT.....**

- It’s a local crime and a community issue
- It remains a largely ‘unseen’ crime
- It is often complex and challenging



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# LOCAL CONTEXT

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- Sources of referrals – calls for service, NRM, intelligence, SARs, Duty to Notify, MS Helpline
- 2018 - 52 victims encountered, 35 males and 17 female
- Age range is 17 to 48 (one 7 year old identified as part of family unit)
- Males- labour & criminal exploitation. Female – labour, sexual exploitation and domestic servitude
- Countries of origin – UK, Poland, Romania, Albania, Vietnam
- Numerous disclosures of crimes outside of UK
- Vulnerability of many victims, often with complex needs – asylum claims, mental health, substance misuse, immigration status, fractured family units
- Significant under reporting and limited support for criminal proceedings
- 7 organised modern slavery crime groups managed locally
- 1 Joint Investigation Team (Eurojust) in place



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# HMICFRS INSPECTION OF MODERN SLAVERY

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2017 - HMICFRS published its response following a wide ranging inspection into UK's policing of MSHT. Their report, entitled "Stolen Freedom, The Policing Response to Modern Slavery and Human Trafficking", made a number of recommendations for all law enforcement agencies that fall broadly into 7 categories:

1. Leadership
2. Intelligence
3. Victim Identification & Initial Response
4. Crime Recording
5. Investigation
6. Learning
7. Prevention



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# LEADERSHIP

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- Regional Strategic Governance Group lead by an ACC with overarching strategic action plan
  - Lead Officer in Nottinghamshire at Superintendent rank with responsibility for local delivery and performance.
  - Set as control strategy in 2018/19 Strategic Intelligence assessment
  - Set as strategic priority under the 'Protecting People from Harm' theme in the Police and Crime Plan 2018 – 2021
  - Police and Crime Commissioner is signposted to the National Anti-Trafficking & Modern Slavery Network (NATMSN).
  - Dedicated police team sat within the Investigations and Operation Support Directorate with specially trained officers / staff and embedded partnership / safeguarding arrangements. Chief Constable is committed to continued investment in this area of work
  - Established Anti-Slavery Partnership led by local authority Chief Executive with a pledge to make Nottingham and Nottinghamshire slavery free.
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# INTELLIGENCE

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- Triage process managed by MSHT team to ensure source referrals are captured and assessed
  - National / regional data returns and threats assessments shared across partnerships
  - Local threat assessment undertaken annually using MoRILE
  - Processes in place to identify, map and manage MSHT organised crime groups
  - Information sharing agreements in place across key partnerships
  - Regular media communications to build community awareness and increase reporting e.g., Operation Aidant, promoting successful prosecutions
  - On-going awareness training to partners, service providers and NGOs
  - Proactive intelligence gathering operations undertaken jointly with partners e.g., car washed, sex industry, nail bars
  - Maximising compliance with NRM standards and Duty to Notify across agencies
  - Established and effective links to Government Agency Intelligence Network (GAIN)
  - Focused effort on recruitment and use of open source networks
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# VICTIM IDENTIFICATION & INITIAL RESPONSE

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- All first responder agencies across Nottinghamshire have received MSHT, including Police, Fire, NHS, Local Authorities, Trading Standards.
  - Awareness training delivered to other key agencies, both public, private and 3<sup>rd</sup> Sector e.g., MASH, Adult / Child safeguarding, Probation, High street banks, Unions, Social Care, Safeguarding Champions
  - Force has adopted the Human Trafficking Foundation's, 'The Slavery and Trafficking Survivor Standards'
  - Joint working with University of Nottingham to understand survivor journeys
  - Recent regional adoption of Barnardo's Independent Child Trafficking Advocates
  - Continues use of Red Cross 'Your Space' project providing per-NRM emergency accommodation and support in Nottinghamshire and Derbyshire
  - Nottingham City Council 12 month accommodation pilot
  - Specialist trained officers in interviewing vulnerable victims
  - Continued engagement with CPS around victimless prosecutions
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# CRIME RECORDING

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- MSHT triage all reports and referrals to ensure compliance with National Crime Recording Standards (NCRS)
- Internal audit in 2018 found 100% compliance



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# INVESTIGATION

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- Call Handlers and Help Desk staff have received training and can access guidance to identify incidents of MSHT
  - Front line officers have access to MSHT booklet and electronic guidance via Optik interface
  - Training provided across all agencies on NRM and Duty of Notify.
  - Nationally accredited specialist training provided to all MSHT team investigators
  - Joint Investigation Teams being utilised through Eurojust i.e., recently with Nottinghamshire and Polish investigators / prosecutors
  - Maximising use of Interpol and European law enforcement tools
  - Financial investigators now routinely allocated to MSHT enquiries
  - Established partnership network ensures early exchange of information and mutual support
  - The force has, pro-rata, achieved high levels of successful MSHT prosecutions nationally
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# LEARNING

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- E learning and classroom training delivered across force, including to new recruits. New College of Policing material to be made available during 2019
- Numerous training events and deliveries across full range of partners delivered by both Police and Hope for Justice
- Training materials / information available across numerous websites, including POLKA
- Access to expertise and tactical advice through Modern Slavery Transformation Units
- Attendance at relevant CPD events annually



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# PREVENTION

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- Force is working collaboratively with other agencies, such as the GLAA, in areas that are traditionally linked to MSHT i.e., The Responsible Car Wash Scheme
- Force has successfully applied for Slavery and Trafficking Preventions Orders for offences committed under the Moderns Slavery 2015
- Force is now focused on working with other agencies to secure Slavery and Trafficking Restriction Orders (pre-conviction) for organised CSE offenders and those involved in the criminal exploitation of young persons and vulnerable adults (County Lines)
- Work with universities and immigration of the student visa process, which can be abused to facilitate the movement of potential victims into Nottinghamshire, particularly from Vietnam and China
- Promote the Modern Slavery Transparency Statement across all business and public sector partners in Nottinghamshire
- Joint working with prostitution outreach workers



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# THE FUTURE

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- Continue investment in the MSHT Team in both personnel and training
- Increased awareness training with a focus in 2019 on the private business sector
- On-going promotion of Responsible Car Wash Scheme and similar prevention initiatives
- Development of a MARAC style structure to manage both victims and offenders (to be piloted in the City in early 2019)
- Further promotion of issues across communities to encourage reporting and greater intelligence
- Increase the number of Joint Investigation Teams to tackle crime groups globally that have links to Nottinghamshire
- Work with partners to increase availability of emergency and longer term accommodation for victims
- Independent review of Modern Slavery Act 2015



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# CHALLENGES

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- Brexit – loss of European investigation arrangements / changing profile of criminality i.e., exploitation of more UK citizens
- Reduced funding for Modern Slavery Transformation Unit and specialist advisers
- Loss of funding for the Red Cross ‘Your Space’ project
- Potential for increasing numbers of falsified NRM referrals made by asylum seekers to strengthen claims of legitimacy
- Growth in ‘County Lines’ criminal exploitation
- Capacity to cope with emergency ‘bed space’ and accommodation needs
- Capacity and capability of the National Referral Mechanism
- Indifference of some sections of society



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# CLOSING REMARKS

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- Nottinghamshire Police recognise they have only just scratched the surface of what is still very much an 'unseen' crime. Strong collaboration with local partners has allowed for a more informed understanding of the threat and provided an enhanced capability to support local investigations and prevention strategies.
- The actual number of victims encountered remains low in relative terms when compared with other crime types. However, the needs of victims are challenging and investigations into this organised criminality remains complex, often requiring overseas travel and negotiations with international law enforcement partners
- Nottinghamshire Police are meeting the recommendations from HMICFRS' 2017 report, but acknowledge that they need to continually adapt to the changes and complexities of investigating MSHT and supporting vulnerable victims.



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