

Modern Day Slavery and Trafficking scrutiny review

Community Safety Scrutiny Commission Report

May 2019

Summary

Modern Day Slavery and Child Trafficking is an emerging priority for the council and wider safeguarding partnership. Southwark Council signed up to the Cooperative Party Modern Slavery Charter last year and Modern Slavery is a recently adopted priority for the Safer Southwark Adults Board. Trafficking will also be addressed as part of the emerging VAWG strategy; the original impetus for this review.

The Commission heard from officers and anti-slavery experts, and is grateful for their input, particularly Tamara Barnett, Human Trafficking Foundation and Catherine Baker Senior Research, Policy and Campaigns Officer, ECPAT UK.

The Home Office has described modern slavery as “a serious and brutal crime in which people are treated as commodities and exploited for criminal gain. The true extent of modern slavery in the UK, and indeed globally, is unknown”. The Home Office has estimated, in its Modern Slavery Strategy, that there may be as many as 13,000 people held in slavery in the UK.

The National Crime Agency Data Southwark statistics show in 2016 one adult was identified under the Modern Slavery Act by the Council, which is low. The Human Trafficking Foundation estimated that 200 would be realistic figure for Southwark, and a focus on this work ought to see the number of referrals go up.

Modern slavery is a complex, serious and often organised crime. Under Section 17 of the Crime and Disorder Act councils have a duty to do all that they reasonably can to prevent crime and disorder in their areas, which will include tackling modern slavery and trafficking. There are a range of crimes where councils may come across victims and perpetrators of modern slavery, including county lines drug dealing, child sexual exploitation, gangs, violent crime, forced labour and begging, amongst others.

The crime of slavery overrides any illegal immigration or other minor offences: Karen Bradley, former Minister: “The intent of the offence of illegal working is clear; it is not aimed at the victims of modern slavery.” The person exploiting an individual should be the focus of the primary law enforcement effort, while victims of slavery should be treated as victims rather than perpetrators of crime. An accusation of theft or illegal migration should not take precedence.

The Cooperative Party Modern Slavery Charter requires a number of actions from the Council; particularly ensuring our whistle blowing procedures are adequate, and that the council is using its tendering and contracting procedures to identify signs of slavery. The review received an action plan setting out progress. An annual report on this work is due July 2019. The Commission recommends that this report includes a timeline with milestones to monitor and accelerate progress.

The officer lead for Modern Slavery has been located in Regulatory Services and this team have done some very good work to tackle forced labour. Following reports of concerns at a car handwashing project the team did a piece of work with 17 car washes in Southwark to monitor health and safety compliance, and as part of this look for signs of forced labour. Three premises gave rise to concerns on both fronts. The council now intend to do a similar piece of work with nail bars; this time in association with more partners.

Following this work the Commission recommend that the council identify other high risk industries for modern day slavery, as a prelude to running an awareness raising campaign across Southwark on modern slavery with the public, statutory partners, local businesses and the voluntary sector.

The investigation into car washes, alongside council work on the Housing Licensing Scheme, has identified the role of some landlords in both flouting Housing Legislation, and engaging in other forms of negligence and exploitation. A Rogue Landlord Partnership Task Force has been set up to investigate landlords who

are involved in a number of criminal activities , including tax evasion, trafficking and modern day slavery, abuse of immigration regulations and money laundering. Currently 25 are under investigation.

Tamara Barnett from the Human Trafficking Foundation recommended that an Adult MASH is considered to protect vulnerable adults from exploitation.

Regulatory Services are also delivering training to night time front line staff to recognise Child Sexual Exploitation (CSE), in particular, but also other signs of exploitation, including human trafficking.

Tackling modern slavery and trafficking by linking with existing work on CSE and criminal exploitation was recommended by the Human Trafficking Foundation. Southwark's Children's Safeguarding Board has extended its recent work on Child Sexual Exploitation to include Exploitation.

Nearly half of all victims of Modern Slavery and Trafficking are children. ECPAT gave evidence that trafficked children, and unaccompanied children in care, are a particularly vulnerable group; nationally nearly a third of trafficked children go missing at least once and 20% are never found. Southwark could not provide the data to ECPAT on child trafficking because of the flags used to categorise the data; and this needs to be addressed.

Officers reported that in Southwark children rarely go missing from care completely; and they see less classically trafficked children. Officers said they did, however, encounter Domestic Servitude and Forced Labour for cannabis gardening. The Commission recommends the council pay particular attention to the risk of Domestic Servitude and link up with AFRUCA, who are doing excellent work to tackle child trafficking. Catherine Baker from ECPAT is starting to work with the council to train front line workers. She advised this is crucial along with consistently treating all unaccompanied children as potentially trafficked children.

Labour exploitation is on the rise. One of the communities most at risk of modern slavery are people involved in UK drug gangs, who are employing Modern Slavery methods to exploit people on 'county lines', where often vulnerable urban young people are controlled and exploited by drug gangs to sell drugs in towns outside of the city. The council is working with around 200 children at risk from Modern Slavery through 'county lines', directly or indirectly. This is an area of particular focus at the moment.

A locality review was recently commissioned by the Children's Safeguarding Boards on the area of gangs and exploitation, led by the Violence and Vulnerability Unit of the Home Office. The Extended Learning Review lasted 5 days and took place in January 2019. The principle recommendation was to pull all the work to tackle CSE, gangs, violence and modern slavery under a Community Harm and Exploitation Board (CHEB).The review endorses the above recommendation; Modern Slavery and Trafficking intersects with many other types of harm and exploitation and cuts across most front facing parts of the council. The need for strategic leadership and coordination was a recurring theme.

A task and finish group on Modern Slavery and Trafficking ought to be established to report to this board, to ensure all the various strands of work on this issue are brought together in a coherent way. Alongside linking this work to the proposed CHEB, the commission also recommends the council seek Modern Slavery Champions, Special Points of Contact (SPOC) in different teams, and there is a named officer and cabinet lead to drive this agenda.

Recommendations The Council should:

- 1. Set up a task and finish Modern Slavery & Child Trafficking group, that would include housing, and would ensure that there is an integrated and comprehensive plan pulling together the current work on modern slavery and child trafficking, including a referral process, reporting to the above recommended CHEB.**
- 2. Create specialist council leads on Child Trafficking / Child Sexual Exploitation, and that they are the same person or work together closely.**
- 3. Consistently treat all unaccompanied children as potential victims of slavery.**
- 4. Make sure Section 47 is done for all those children.**
- 5. Ensure that the council flagging and data collection on child trafficked/unaccompanied children meets best practice.**
- 6. Pay particular attention to the risk of Domestic Servitude and link up with AFRUCA, who are doing excellent work to tackle child trafficking.**
- 7. Conduct council wide mandatory training for all staff and members to raise awareness, provide effective support to victims where appropriate; including a protocol advising on the duty to notify and process to follow, explaining the reporting mechanisms for safeguarding adults and children.**
- 8. Create Modern Slavery Champions within the Council (similar the mental health champions) and identify a SPOC in different teams.**
- 9. Create a named lead officer and cabinet lead on slavery.**
- 10. Consider creating an Adult MASH.**
- 11. Pull together the annual report on the Cooperative Charter by July; ensuring there is an action plan to complete the commitments, with a timeline.**
- 12. Review the highest risk industries for modern day slavery as a prelude to running an awareness raising campaign across Southwark on modern slavery with the public, statutory partners, local businesses and the voluntary sector.**

1. Introduction and background

- 1.1. This is the final report of the review into on Modern Day Slavery & Child Trafficking.
- 1.2. Modern Day Slavery and Child Trafficking is an emerging priority for the council and wider safeguarding partnership. Southwark Council signed up to the Cooperative Party Modern Slavery Charter last year. As part of this we are expected to produce an annual update on our progress. Modern Slavery is a priority for the Safer Southwark Adults Board. This was agreed in October 2018 and is for an 18 month period (until end March 2020).

2. Evidence Considered & Methodology

Methodology

- 2.1. During the first scrutiny meeting (29th October 2018) the Commission looked at VAWG across the board including plans for the new VAWG strategy, which included tackling trafficking.
- 2.2. Following evidence presented during the initial meeting the Commission decided to focus the second scrutiny meeting (5 February 2019) on modern day slavery and child trafficking, in particular. This meeting involved both external and internal stakeholders.
- 2.3. The third scrutiny meeting (29th April 2019) reviewed the updates on Modern Slavery from officers.
- 2.4. Research methods included:
 - *Desktop research and literature review* - a full review of current local authority, regional and national anti-slavery strategies.
 - *Analysis of existing local data, action plans and strategies* - existing Southwark strategies and action plans on slavery.
 - Interviews - with anti-slavery experts
 - Events/conferences - ECPAT conference and Southwark conference HYP Southwark stakeholder

2.5. Key stakeholders consulted

- Head of Corporate Team, legal Services; Head of Regulatory Services; Director, Children & Families; Strategic Lead for Adult Safeguarding, Deprivation of Liberty Safeguards & Principal Social Worker for Adults, Cabinet Member for Children, Schools and Adults presented on our Anti-Slavery work.
 - Police (Detective Superintendent Sean Oxley – Safeguarding Lead for Central South and DI Paul Graves – Deputy in Safeguarding Hub for Central South)
 - Anti-Slavery experts (Tamara Barnett: Human Trafficking Foundation, Catherine Baker Senior Research, Policy and Campaigns Officer, ECPAT UK and Aidan McQuade Anti-Slavery expert)
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3. Modern Day Slavery and Trafficking

3.1 What is Modern Slavery?

The Home Office has described modern slavery as “a serious and brutal crime in which people are treated as commodities and exploited for criminal gain. The true extent of modern slavery in the UK, and indeed globally, is unknown”.

The Modern Slavery Act 2015 encompasses human trafficking as well as slavery, servitude and forced or compulsory labour. Modern Slavery = Means + Purpose. It does not necessarily include the ‘Act’ element of the human trafficking process. In practice, the terms modern slavery and human trafficking are often used interchangeably. The UN defined human trafficking in the Palermo Protocol as the ‘recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, or use of force, coercion or deception...to achieve the consent of a person having control over another person, for the purpose of exploitation’. According to this definition, trafficking includes sexual exploitation, forced and bonded labour, domestic servitude, any form of slavery and removal of organs. All three components must be present for an adult to be considered trafficked. However, as regards children, the ‘means’ component is not required as they are not able to give consent

3.2. Trafficking in the UK

In 2017, 5,145 potential victims from 116 different countries were referred into the National Referral Mechanism (NRM)¹ to be identified as survivors of trafficking and to receive support. In reality, the extent of human trafficking in the UK is likely to be far greater than the NRM statistics would suggest. The Home Office has estimated in its Modern Slavery Strategy that there may be as many as 13,000 people held in slavery in the UK.

Exploitation in the UK takes a variety of forms, but most commonly forced labour, sexual exploitation, domestic servitude, and forced criminal activity.

Consent is irrelevant to exploitation: The Palermo Protocol and Home Office guidance both make clear that a person cannot consent to their own exploitation: “An individual’s consent to the conduct alleged to amount to slavery servitude or forced or compulsory labour does not prevent the offence being committed.”

Exploitation need not have taken place yet to constitute slavery or human trafficking: Home Office guidance states that: “Under the Convention, a person is a ‘victim’ even if they haven’t been exploited yet...it is the purpose which is key, rather than whether or not exploitation has actually occurred...victims may have experienced serious trauma in their home country or on the way to the UK and may still be in need of support.”

The crime of slavery overrides any illegal immigration or other minor offences: Karen Bradley, former Minister: “The intent of the offence of illegal working is clear; it is not aimed at the victims of modern slavery.” The person exploiting an individual should be the focus of the primary law enforcement effort, while victims of slavery should be treated as victims rather than perpetrators of crime. An accusation of theft or illegal migration should not take precedence.

Victims of slavery often do not fit a stereotype: Victims of human trafficking can come from a variety of backgrounds including being well educated and from wealthy families. Adult men and boys can be victims of trafficking in similar types of exploitation to women and girls, and many victims of slavery come from the UK as well as abroad. Traffickers may also not fit an expected profile and may appear to be outwardly respectable and likeable people.

People rarely self-identify as victim of trafficking/slavery or easily reveal their experiences: Victims may not self-identify as a victim of trafficking for a variety of reasons, including but not limited to: fear of reprisals

¹ The **National Referral Mechanism** (NRM) is a framework for identifying victims of human trafficking and ensuring they receive appropriate care. A range of agencies may be involved in a trafficking case such as the police, the UK Border Agency (UKBA), local authorities and non-governmental organisations such as charities.

from their exploiters; the impact of trauma on their ability to recall and disclose their experiences; stigma; and an unwillingness to consider them self as a 'victim'. They are also unlikely to be familiar with terms such as trafficking or modern slavery.

Not all migrants working illegally are trafficked: While not all victims will identify as victims of trafficking it is important to also recognise that not all migrants working in the UK, for example, for less than the minimum wage or in an illegal activity have been trafficked.

Smuggling is not trafficking: Frontline staff must also avoid confusing human trafficking with human smuggling. In smuggling cases, asylum seekers and immigrants pay people to help them enter the country illegally. This is a crime against the state rather than a crime against an individual. Smugglers provide an (illegal) service rather than treating a person as a commodity. It is also short-term rather long term with a one off payment rather than ongoing appropriation.

However it is important to note that trafficking victims may start out believing that they are being smuggled, and be free on arrival but end up in a potentially exploitative situation, where they are forced to work to pay off their 'debts', which may be increased over time to retain control over them.²

Modern slavery is a complex, serious and often organised crime. Under Section 17 of the Crime and Disorder Act councils have a duty to do all that they reasonably can to prevent crime and disorder in their areas, which will include tackling modern slavery and trafficking. There are a range of crimes where councils may come across victims and perpetrators of modern slavery, including county lines drug dealing, child sexual exploitation, gangs, violent crime and forced begging, amongst others.

² <https://www.humantraffickingfoundation.org/theissue>

4. Modern Day Slavery and Trafficking of adults and children in the UK and Southwark

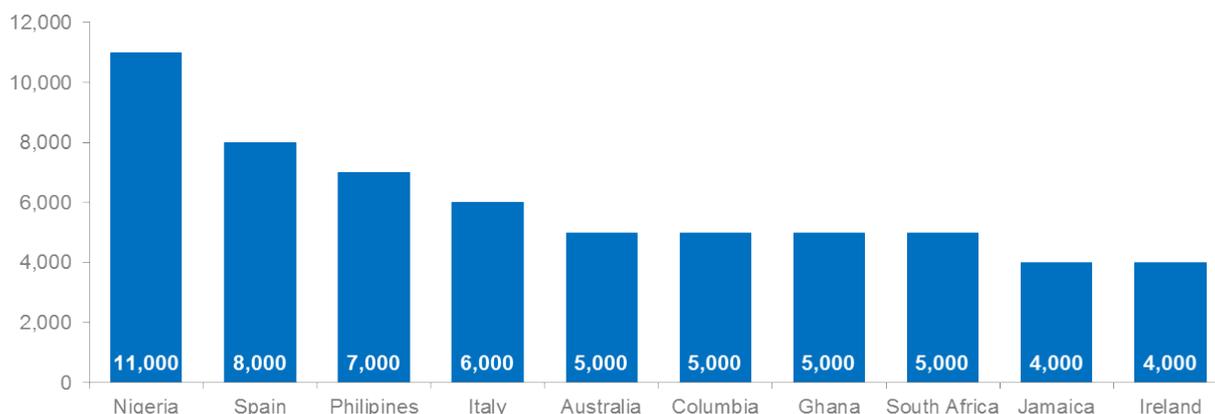
4.1 Tamara Barnett from the Human Trafficking Foundation gave an overview of Modern Slavery. Communities most at risk of modern slavery include UK drug and gangs using Modern Slavery to exploit young people on county lines, where often vulnerable urban young people are controlled and exploited by drug gangs to sell drugs in towns outside of the city, Vietnamese (cannabis farming), Nigerian (domestic servitude) and Albanian (sex trafficking).

4.2 Most recently the NRM identified **5,000 victims of modern slavery in the UK, 2,000 of these were children**. In the UK 20% per cent of children go missing in LA care. The National Crime Agency Data Southwark statistics show in 2016 one adult was identified under the Modern Slavery Act, which is low. A Hestia report highlighted that there were 55 victims in a safe house from Southwark. The Human Trafficking Foundation estimated that 200 would be realistic figure for Southwark, and a focus on this work ought to see the number of referrals go up.

4.3 Looking at the population resident in Southwark, Nigeria is the most common country of origin for those residents born outside the UK, with an estimated 11,000 residents originating from that country. There is great deal of uncertainty behind these estimates, so they need to be treated with a degree of caution. For many countries of the world the council do not have a reliable estimate – including Albania and Vietnam.

Figure 1: Top 10 country of origin for Southwark residents born outside the UK

Source: Office for National Statistics



4.4. Local authorities have a statutory obligation to identify victims of trafficking and Modern Slavery. There is often a lack of support before a victim goes into a safe house and when they leave (usually after 90 days). Local authorities need to work out what gaps there are and how they are recording victims of modern slavery, what multi-agency tools they have in place, and what services they can use that already exist. There are challenging resource issues here as although councils have been given responsibilities this has not been coupled with additional resources.

4.5. Tamara works with local authorities to set up task and finish groups on slavery, looks at best practice, gaps in reporting, and creates local authority slavery leads. She is already doing some work with Southwark and spoke at a recent event organised by the adult safeguarding board. She said it is crucial that all frontline staff, including councillors, are trained to identify possible victims of modern slavery. Tamara recommended setting up a task and finish group, which ought to include housing, and also consider creating an Adult MASH.

4.6 Other good practice is to have a Modern Slavery Special Point of Contact (SPOC) in different teams, and also for members to consider this role.

5 Child Trafficking

5.1 Catherine Baker Senior Research, Policy and Campaigns Officer from Every Child Protected Against Trafficking (ECPAT UK) reported that she had started to do some work with Southwark on child trafficking training.

5.2 **Nearly** half of all victims of Modern Slavery and Child Trafficking are children. Labour exploitation is on the rise. 28% of trafficked children, and 13% of unaccompanied children in care go missing at least once, and 20% are not found.³ She reported that Southwark could not provide the data on child trafficking because of the flags used to categorise the data. She advised training for front line workers is crucial. It is also important to consistently treat unaccompanied children as potentially trafficked children.

5.3 She advised that Child Trafficking cuts across the boundaries of Child Sexual Exploitation (CSE) and criminal exploitation, with many children are experiencing multiple forms of exploitation and harm. It is best practice to have CSE lead and a Child Trafficking lead and it works well if these are the same people.

6. Southwark's safeguarding and child protection work, including County Lines and criminal exploitation

6.1 The council is working with around 200 children at risk from Modern Slavery through county lines' - directly or indirectly.

6.2. The safeguarding board has now moved from Child Sexual Exploitation (CSE) to the broader theme of Criminal Exploitation. Child Sexual Exploitation was a priority in 2017-18. In 2018-19 the SSCB (Children's Board) expanded this priority to Exploitation (covering Child Sexual Exploitation and Criminal Exploitation). This will continue to be a priority moving into 2019-20.

6.3 Officers reported that the council sees less classically trafficked children and the department do not see children go missing from care; generally if children come into Southwark's care they stay. They do see isolated cases of child trafficking; gardeners (cannabis) and teenagers (domestic servitude).

6.4. The police added that they are looking at repeat missing episodes from care. They thought those at most risk are children homed away from the borough. There is also an issue with children who are criminal exploited and committing crimes e.g. 'county lines'. This is not a new thing, but is something that is now being focused on by partners. When the police do surveillance they see both children and vulnerable adults exploited. There is more to be done locally to address repeated missing incidents that often lead to county lines. Social workers and parents have good intelligence on this that can be utilised. Tamara added that Lewisham has done a really good piece of prevention work on mapping risks and vulnerabilities on county lines.

6.5 Considering the evidence presented above it would seem that the biggest risks for Southwark young people are Modern Day slavery through exploitation by criminal gangs and domestic servitude associated with Nigeria. However more work is needed to identify at risk groups and develop targeted interventions.

6.6 Modern Slavery is a priority for the SSAB (Adults Board) - this was agreed in October 2018 and is for an 18 month period (until end March 2020).

6.7. This topic is on the agenda for the SSAB meeting on 25th April 2019 and it is anticipated that work streams will come out of this meeting.

6.8. There was a Modern Slavery community awareness raising event in January 2019 for voluntary sector organisations. Approximately 40 people were in attendance at this 2 hour event.

³ Evidence to the commission meeting and ECPAT UK (2016) Heading back to harm: a study on trafficked and unaccompanied children going missing from care in the UK

6.9 A locality review was commissioned by the SSCB on the area of gangs and exploitation led by the Violence and Vulnerability Unit (VUU) of the Home Office. The Extended Learning Review lasted 5 days and took place in January 2019, with 80 partners were interviewed. A report has been produced with a number of recommendations and this is on the agenda at the next SSCB in June 2019.

6.10 The principle recommendation was to pull all the work to tackle CSE, gangs, violence and modern slavery under a Community Harm and Exploitation Board (CHEB). This should deal with group exploitation and violence in all manifestations. An agreed partnership vision, direction, strategy, action plan outputs and measured outcomes is recommended, along with a clear agreement that major agencies such as Public Health (for example) should report to the CHEB around these metrics, in addition to responsibilities and requirements to other boards.

6.11 The review endorses the above recommendation; the need for strategic leadership and coordination was a recurring theme. Modern Slavery and Child Trafficking intersects with many other types of harm and exploitation and cuts across most front facing parts of the council.

Recommendations

The Council should:

- 1. Set up a task and finish Modern Slavery & Child Trafficking group, that would include housing, and would ensure that there is an integrated and comprehensive plan pulling together the current work on modern slavery and child trafficking, including a referral process, reporting to the above recommended CHEB.**
- 2. Create specialist council leads on Child Trafficking / Child Sexual Exploitation, and that they are the same person or work together closely.**
- 3. Consistently treat all unaccompanied children as potential victims of slavery.**
- 4. Make sure Section 47 is done for all those children.**
- 5. Ensure that the council flagging and data collection on child trafficked/ unaccompanied children meets best practice**
- 6. Pay particular attention to the risk of Domestic Servitude and link up with AFRUCA, who are doing excellent work to tackle child trafficking.**
- 7. Conduct council wide mandatory training for all staff and members to raise awareness, provide effective support to victims where appropriate; including a protocol advising on the duty to notify and process to follow, explaining the reporting mechanisms for safeguarding adults and children.**
- 8. Create Modern Slavery Champions within the Council (similar the mental health champions) and identify a SPOC in different teams.**
- 9. Create a named lead officer and cabinet lead on slavery.**
- 10. Consider creating an Adult MASH.**

7 Adoption of the Co-operative Party's Charter against Modern Slavery.

7.1 The review received an action plan of work being undertaken following the council's adoption of the Co-operative Party's Charter against Modern Slavery. This shows that progress is being made. Some of the ten commitments are already being met, whilst to deliver others further action is required, and the commitments will therefore be delivered in 2019/20. The final commitment of the charter is to report annually, which is due in July 2019.

7.2 The charter consists of these commitments:

- Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.
- Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.
- Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.
- Highlight to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.
- Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.
- Require its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.
- Review its contractual spending regularly to identify any potential issues with modern slavery.
- Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.
- Refer for investigation via the National Crime Agency's national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery.
- Report publicly on the implementation of this policy annually.

8. Regulatory Services

8.1 Following the adoption of the Cooperative charter against Modern Slavery the former council lead on Modern Slavery was located in Regulatory services. He has now left. The department has done a significant amount of work in this area. Modern Slavery first came to officers' attention with people sleeping in cars. Recently they have done some targeted work with local car washes, following concerns about modern slavery at one business. The department is also working to tackle rogue landlords, who are associated with Modern Slavery, and rolling out training.

Targeting business at risk from Modern Slavery

8.2 Following local intelligence from a member of the public provided to Southwark's Anti-Social Behaviour Unit (SASBU) the Metropolitan Police Service (MPS), along with investigating officers from the Gangmasters & Labour Abuse Authority (GLAA), executed a warrant at a commercial hand car wash premises in Southwark. A person was arrested on suspicion of human trafficking, money laundering and the illegal importation of tobacco products.

8.3. A total of 12 adult workers considered to be victims of trafficking for labour exploitation were found on the premises. On searching the arrested person's home the Police found 5 more adults and a 4yr old child.

8.4. 6 of the adult victims agreed to assist with enquiries and were removed, along with the child, to a temporary reception centre. There they were supported, interviewed and assessed as potential victims of modern slavery and trafficking.

8.5 Following this incident Southwark Council's Regulatory Services decided to undertake a project to investigate if similar businesses, with potentially similar concerns, were operating in the borough. A Local

Initiative Health & Safety Project was added to the Health & Safety Enforcement Team's work plan for 2018/19. The project aimed to:

- Identify all operational hand car washes in Southwark
- Map all identified operational hand car washes
- Provide health & safety advice to all hand car wash operators
- Ensure safe systems of work at all hand car washes
- Scout for potential modern slavery practices in all hand car washes

8.6. 17. Seventeen car washes were inspected. The co-operation of, and engagement with, local businesses was good at the vast majority (88%) of premises visited. Compliance with health and safety law was good at the vast majority (88%) of premises, indicating that this business sector is not generally unaware of its legal obligations. 12% of premises gave cause for concern with regard to health and safety law compliance and were referred to the Health & Safety Executive (HSE). The same 12% of premises also gave cause for concern for potential modern slavery and were referred to the Gangmaster & Labour Abuse Authority (GLAA)

8.7. Recommendations from the Project included that modern slavery awareness training is arranged for Southwark Council's front line staff, and managers and that it include information on the reporting mechanisms for safeguarding adults and children.

8.8 Regulatory Services will undertake a similar project to that undertaken with car washes in respect of nail bars. It will employ a similar methodology, however it is likely more partners will be invited to join. There are 119 known nail bars in Southwark, however it is anticipated that there are many more.

8.9 Nail bars are known to be difficult premises to deal with as experience demonstrates that when the presence of an official is known, most "employees" pack and immediately leave. Such a reaction raises suspicion that some of these people may be trafficked and/or subject to some kind of servitude.

Rogue Landlord Partnership Task Force

9.1 The work of Regulatory Services has shown, particularly since the start of Southwark Council's Private sector Housing Licensing Scheme, that rogue landlords are often involved in a number of criminal activities other than flouting Housing and associated Legislation. These activities include tax evasion, trafficking and modern day slavery, abuse of immigration regulations and money laundering to mention a few.

9.2. To help tackle these crimes and in particular trafficking, slavery and immigration abuses Southwark has set up a Multi-Disciplinary Task Force focussed on the worst Landlords who operate in the Borough.

9.3. The partnership consists of colleagues from Private Sector Housing Enforcement and licensing team, Trading Standards, Planning Enforcement, Revenues and Benefits, Temporary Accommodation, Tenancy Relations Service, SASBU, Legal Services, Local Land Property Gazetteer, The Home Office, Fire Brigade, Police, HMRC, Gangmasters and Labour abuse authority (GLAA) and the Immigration Service. The Task force meets every other month. There are currently 25 landlords that are known to have committed housing, planning and trading standards offences who are being investigated in "forensic detail" by the partnership. This includes financial investigations, investigations into criminal contacts that link with the various illegal activities mentioned above.

9.4 To date over 3,000 housing licenses have been granted which means the landlords managing those properties are complying with the law, are providing safe accommodation and are very unlikely to be committing any of the offences the task force is interested in tackling. In addition to the above there are a further 24 landlords who are facing legal offences for letting dwellings that place tenants at serious, health, safety and welfare risks.

10 Training

10.1 Regulatory Services are delivering a cascade model of in-house training to our front line staff. Designed by Barnardo's the package of training called 'Nightwatch' aims to empower our officers to be a

network of eyes and ears alert to recognise signs of exploitation as they may relate to human trafficking and other forms of exploitation.

10.2. Initial training will be delivered to our staff who work in the Night Time Economy but will be broadened out to include other front line staff.

10.3 This package of training largely focuses on Child Sexual Exploitation but frames it in the context of other vulnerabilities including trafficking and /or other forms of criminal exploitation.

Recommendations

The Council should:

- 11 Pull together the annual report on the Cooperative Charter by July; ensuring there is an action plan to complete the commitments, with a timeline.**
- 12 Review the highest risk industries for modern day slavery as a prelude to running an awareness raising campaign across Southwark on modern slavery with the public, statutory partners, local businesses and the voluntary sector.**