

## **APPENDIX 1**

### **Protocol for Cheshire Police, Local Authority Social Care and Housing services responding to adults identified at risk following police operations in cases of suspected modern slavery.**

#### **Introduction:**

The Modern Slavery Act 2015 introduced the powers that law enforcement agencies need to pursue, disrupt and bring to justice those engaged in human trafficking and slavery, servitude and forced labour. It also introduced a range of measures to enhance the protection of victims. The Cheshire Modern Slavery Strategy helps inform our approach to ensuring the legislative framework is effective in Warrington.

The difficulties in identifying crimes of modern slavery and the significant barriers for potential victims coming forward are well understood. In Cheshire and Warrington, a number of police operations have confirmed that acts of Modern Slavery occur in our borough and that services can help support police operations by working together to help prevent and combat the effects of these crimes. The process of identification can be very challenging, in particular establishing the means and purpose of activities and differentiating in terms of the Act, those adults who are subject to poor or illegal work conditions and those who are victims of Modern slavery through the use of force, control, deception and threat.

This protocol has been produced in order to give clarity to organisations responding to victims identified during police operations who are perceived to be at risk and who may otherwise be considered ineligible or unable to access the support required to protect them. It has been informed by learning and areas for improvement identified during a table top review of practice in a case which occurred in 2017. This identified areas for development in current pathways and inter-organisational responsibility which needed to be addressed in order that clear, effective and timely responses to victims can be provided.

The protocol makes the following assumptions:

- Agencies are fully conversant with the Modern Slavery Act 2015 and their responsibilities within it
- Each service has identified senior officer leads for Modern Slavery.
- Any suspicion of criminal activity is reported and investigated by the police in order that perpetrators can be held to account.
- Potential victims of Modern Slavery are offered the support of the National Referral mechanism and where this is not taken up, Duty to Notify responsibilities are enacted

This protocol will apply to adult victims where the adult has requested repatriation and;

- The adult is not identifying themselves as a victim of MS however there is an active criminal investigation into alleged crimes that suggest they may be a victim, potential victim or otherwise at significant risk; OR
- the adult is identifying themselves as a victim and has refused the support of the NRM; OR the adult has been referred to the NRM and there is a delay in providing the support and accommodation

#### **Information Sharing**

Cheshire Police, Warrington Borough Council agree that this protocol will be underpinned by the sharing of information under the Safeguarding Adults Information Sharing Protocol in order that effective, safe and appropriate arrangements can be made to victims. Information will be shared between organisations, held at an appropriate level within organisations and delegated on a need to know basis in order to provide appropriate support and to minimise potential risks to victims and others, including staff. Responsibility for delegating information will rest with the senior officers within each service.

## **Initial response and identifying next steps with the adult**

When a potential victim is identified during a police operation, the police will need to consider and gain information in the context of their criminal investigation. In relation to this, all the usual considerations will apply including any relevant to the victim's immediate health and safety. In order to interview the adult, the police officers will need to establish any barriers to effective communication include any care and support needs.

It will be the police's responsibility to obtain and secure an interpreter where this is required.

Where there are concerns about the adult's ability to give evidence venerable witness protocols should be followed.

Where the adult has identified care and support needs, a Safeguarding referral must be made.

The police will try to establish whether an adult is a potential victim of slavery under the Modern Slavery Act. When appropriate the police will discuss with the adult the NRM and where there is eligibility and consent, make a referral. Where the adult will not consent\* to a referral but there is concern, the Duty to Notify (DTN) should be made by the police. (\* This should not preclude other agencies re-visiting this with the adult, as appropriate, subsequently).

## **Notifying other agencies**

The police will identify housing services and adult social care as soon as a victim is identified under this protocol.

Adult Social Care will be notified by contacting the First Response team (working hours) 01925 444239. This number will redirect to Out of Hours Service were appropriate and they will ensure that Housing Support will be notified at that time.

The nominated senior police lead will also inform the nominated leads for Housing and adult Social Care of the incident.

## **Agency Responsibilities:**

### **Police**

When the adults' wishes and feelings have been established in relation to acceptance of support and local support arrangements are required, the police will need to initiate appropriate next steps. When there is a referral to the NRM and this is accepted, support will be activated as soon as is possible. Whilst a safe transfer can usually be undertaken the same day, this might not always be the case. If the NRM arrangements are immediate, it will normally be the police's responsibility to arrange a safe transfer.

Where there is to be a delay in accessing NRM support, or the adult has requested re-patriation (or other support) the police will need to refer to Adult Social Care and Housing Support services in order that interim arrangements can be made to provide the necessary support.

This will not be limited to but is likely to include:

- Accommodation
- Care or support coordination
- Money
- Food
- Travel including repatriation

### **Housing**

Housing support will offer an appropriate accommodation and meals package to ensure that the adult has basic accommodation and sustenance. The location and type of accommodation should take into account accessibility and practicality in relation to ongoing support/police enquiries and the risks posed to the adult. The usual (default) offer will be a full board arrangement in a neighbouring authority. Arrangements should be made so this can be accessed for sufficient period as is likely to be required, or until an agreed review point and should not be commissioned on a day to day basis which results in the Adult having to vacate their room without any follow on accommodation being secured.

Wherever practicable housing support will also provide basic welcome packs for to the victims to include standard items such as toiletries.

Where the adult has requested to be re-patriated and the police have confirmed that this would not interfere with criminal processes, housing support will arrange the repatriation.

Where accommodation and support is to be provided under the NRM in another area, Adult social care will arrange a transfer to the care of the NRM to ensure that the vulnerable individual is escorted to the new location.

### **Adult Social Care (ASC)**

ASC will provide a care support coordination service. This will involve wherever possible and practicable, direct face to face contact under the principles of Safeguarding Adults and making Safeguarding Personal in order to establish/check the adults wishes and desired outcomes and to establish any welfare needs. It will be the responsibility of adult social care to ensure that basic needs can be met within the support arrangements and access to any necessary support service is considered. This may include the provision of cash or other arrangements to meet essential needs.

### **Children Social Care**

Where a child or young person is identified as a victim or associated with a victim during a police operation, initial contact (during office hours) must be made with the Warrington Multi-Agency Safeguarding Hub (M.A.S.H.) on 01925 443400 who will be able to provide advice, information and help, including, the provision of appropriate support where the child or young person is considered vulnerable or at risk of harm.

### **HMRC**

HMRC is committed to the cross government strategy to tackle modern slavery. While HMRC is not a 'first responder', it can use its wider enforcement powers around taxation, benefits and credits and the National Minimum Wage to target the activities of those who perpetuate these appalling crimes by going after the one thing they hold dear – their finances.

An exploitative employer of illegal workers is unlikely to be keeping their tax affairs in order, while employers who pay their workers less than the National Minimum Wage could be committing welfare fraud. HMRC is well placed to disrupt this activity, helping stop modern slavery in its tracks.

If you believe you have any information that would be of interest to HMRC then contact our Illegal Working and Modern Slavery Team via their dedicated email in-box:

[mailbox.illegalworking/modernslaveryreferrals@hmrc.gsi.gov.uk](mailto:mailbox.illegalworking/modernslaveryreferrals@hmrc.gsi.gov.uk)

## **Useful Contacts**

### **Warrington Children's Social Care**

Child and Young Person Referrals call:  
Warrington M.A.S.H.: 01925 443400  
(Out of hours call 01925 444400)

### **Warrington Adult Social Care**

Adult Referrals call:  
Warrington Access to Social Care Team: 01925 444239  
(Out of hours call 01925 444400)

### **Other useful strategic contacts:**

Margaret Macklin: 01925 444291  
Warrington Safeguarding Boards (Children's and Adults) Unit: 01925 443126

### **Housing**

Emergency Homelessness Duty Officer for emergency housing support (Office hours): Warrington Borough Council:  
01925 443322 (General Number)

Housing Officer: Ann Woods 01925 246861

### **Reception Centre**

Warrington Community Centres

Barbara Parratt 01925 256904 or Chris Skinkis 01925 444143(Office hours)  
(Out of hours reception centre call Emergency community centre out of hours 07730075916)

### **Cheshire Police**

General Number: 101  
Emergency: 999  
Modern Slavery Coordinator: Clare Ellis: 01606 365823  
Warrington SPOC: Darren Wright: 01606 3634890

### **Sexual Health Services – provided by Bridgewater Community Healthcare NHS Foundation Trust**

Sexual Health Service  
Bath Street Health & Wellbeing Centre  
Legh Street  
Warrington WA1 1UG  
Tel: 01925 843776

### **Drug and Alcohol Services – provided by CGL (Change, Grow, Live) – known locally as Pathways**

14-16 Bold Street  
Warrington  
Cheshire  
WA1 1DE  
01925 415176