



# Modern Slavery Protocol

May 2021

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## Introduction

The Modern Slavery Act 2015 introduced the powers that law enforcement agencies need to pursue, disrupt and bring the 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 difficulties in identifying crimes of modern slavery and the significant barriers for potential victims coming forward are well understood. The [Cheshire Modern Slavery Strategy \(2017-19\)](#) has informed our approach to ensuring the legislative framework is effective in Warrington. The above strategy is currently under review.

Warrington Community Safety Partnership recognises that Modern Slavery is an issue in Warrington. Warrington Anti-Slavery Network helps to ensure that agencies are working together effectively to support victims and combat the effects of these crimes.

The process of identification of Modern Slavery can be very challenging, in particular establishing the means and purposes 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 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 from all cases discussed at the Warrington Anti-Slavery Network since 2017.

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 (NRM) and where this is not taken up Duty to Notify responsibilities are enacted.

It will apply to adult victims in situations where:

- The adult is not identifying themselves as a victim of Modern Slavery and is requesting repatriation, however there is reason to believe that they may be a victim, potential victim or otherwise at significant risk;
- The adult is identifying themselves as a victim and has refused the support of the NRM
- The adult has been referred to the NRM and there is a delay in providing the support and accommodation.

The Protocol also confirms that the impact and the needs of children need to be properly considered when the child is a victim of Modern Slavery, or in a household where Modern Slavery alleged perpetrators or victims are known to reside.

It also supports multi-agency collaboration and planning for intelligence led operations to make provision for adequate support of victims.



## The Hidden Harm Team (Cheshire Constabulary)

Warrington Hidden Harm Team is currently compiled of three officers based at Warrington Police Station working a shift pattern of predominantly days Monday to Friday 8-4pm.

They focus solely on Modern Slavery and human trafficking encompassing the following aspects of modern slavery:

- Adult sex workers,
- Labour exploitation,
- Domestic servitude.

Their remit is to actively develop intelligence of existing and emerging vulnerabilities and threats. Their primary role is one of intelligence gathering by various means. The team can offer support, guidance and assistance to staff both police, partners and civilian who may encounter incidents of modern slavery. Where Modern Slavery may be suspected, the team will support staff with visits they undertake.

Contact details: [Warrington.hidden.harm.team@cheshire.pnn.police.uk](mailto:Warrington.hidden.harm.team@cheshire.pnn.police.uk)  
01606 363130, 01606 364892, 01606 364818

## Information Sharing

Cheshire Police and Warrington Borough Council agree to share relevant information under the terms of this 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 minimise potential risks to victims and others, including staff. Responsibility for delegating information will rest with the senior officers within each service. This is in line with the General Data Protection Regulation.

## 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 barrier to effective communication, including any care and support needs.

- It is the responsibility of the police to obtain and secure an interpreter where required.
- Where there are concerns about the adult's ability to give evidence, vulnerable witness protocols should be followed.
- Where the adult has identified care and support needs, a safeguarding concern must be raised with First Response (Warrington Borough Council).



The police will seek 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 the referral. Where the adult will not consent to a referral but there is a concern, the Duty to Notify (DTN) should be made by the police. Where consent to the NRM is not given, this should not preclude other agencies re-visiting this subject with the adult as appropriate.

## Agency responsibilities

### Cheshire Constabulary

When the adults' wishes and feelings have been established in relation to acceptance of support and local support arrangements required, the police will initiate the next appropriate 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 repatriation (or other support) the police will 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

Adult Social Care 01925 444239 (office hours) 01925 444400 (out of hours)

Emergency Homelessness Duty 01925 246868 (office hours) 01925 444400 (out of hours)

### 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 risk posed to the adult. The usual (default) offer will be a full board arrangement in a neighbouring authority, pending a more appropriate countywide resource being identified. (It is recognised that this is not ideal as without any onsite support, the adult may be isolated and vulnerable.)

Arrangements should be made so this can be accessed for a sufficient period as is likely to be required, or until an agreed review point. It should not be commissioned on a day to day basis which results in the adult having to vacate without any follow on accommodation being secured.



Wherever practicable housing support will also provide basic welcome packs for the victim including standard items such as toiletries.

Where the adult has requested to be repatriated and the police have confirmed 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 and transportation is not provided by the NRM or police, adult social care will arrange a transfer to the care of the NRM to ensure that the vulnerable adult is escorted to the new location.

### Adult Social Care (ASC)

Adult social care 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 is 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 money or other arrangements to meet essential needs and should include consideration of the welfare support available, including from third sector support organisations. This should take into account the adults vulnerability whilst in the transitional accommodation and need for assurance and direct support.

All concerns regarding Modern Slavery should be logged on the ASC client database and reported in the quarterly return via the Safeguarding Partnership team. This data will be reflected in the annual Safeguarding Adult Collection (SAC) statutory return. Where the adult is not considered to have care and support needs this should be reflected as a non-statutory section 42 enquiry.

### Children's Social Care (CSC)

Where a child or young person is identified as a victim or associated with a victim during a police operation, or where children have been identified in the care of either perpetrators or victims, initial contact to be made with the Warrington Multi-Agency Safeguarding Hub (MASH) 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.

Warrington MASH 01925 443400 (office hours) 01925 444400 (out of hours)

All concerns regarding Modern Slavery should be logged on the CSC client database and reported in the quarterly return via the Safeguarding Partnership team.



## Operations involving multiple victims

Where there is notice of a likelihood of a group of victims being identified, agencies should endeavour to arrange in advance for suitable support services to be available. This should include consideration of accommodation, health, social care and other relevant support.

In these instances the Council will identify the most suitable accommodation available to act as a reception centre through the Community Centres service.

Warrington Community Centres  
01925 256904 or 01925 444143 (Office hours)  
07730 075916 (Out of hours)



## Useful contacts

Warrington children's social care	<p>Warrington MASH: 01925 443400  <a href="mailto:childreferral@warrington.gov.uk">childreferral@warrington.gov.uk</a></p> <p>Out of hours: 01925 444400</p>
Warrington adult social care	<p>First Response: 01925 444239  <a href="mailto:FirstResponseTeamDuty@warrington.gov.uk">FirstResponseTeamDuty@warrington.gov.uk</a></p> <p>Out of hours: 01925 444400</p>
Warrington adult safeguarding service	<p><a href="mailto:Safeguarding&amp;qaservice@warrington.gov.uk">Safeguarding&amp;qaservice@warrington.gov.uk</a>          01925 444078</p>
Cheshire Constabulary	<p>General number: 101          Emergency: 999</p> <p>Warrington Hidden Harm Team: 01606 363130/ 01606 364892/          01606 364818  <a href="mailto:Warrington.hidden.harm.team@cheshire.pnn.police.uk">Warrington.hidden.harm.team@cheshire.pnn.police.uk</a></p> <p>Cheshire Modern Slavery Coordinator: 01606 365 823  <a href="mailto:Modern.slavery@cheshire.pnn.police.uk">Modern.slavery@cheshire.pnn.police.uk</a></p>
Housing	<p>Emergency Homelessness Duty Officer: 01925 246868</p> <p>Out of hours: 01925 444400</p>
Reception Centre	<p>Warrington Community Centres: 01925 256904/ 01925 444143  <a href="mailto:communitycentres@warrington.gov.uk">communitycentres@warrington.gov.uk</a></p> <p>Out of hours: 07730 075916</p>
Sexual Health Services (provided by Bridgewater Community Healthcare NHS Foundation Trust)	<p>Bath Street Health &amp; Wellbeing Centre, Legh Street, WA11UG          01925 843776</p>
Drug and Alcohol Services (provided by CGL – Change, Grow, Live)	<p>Pathways, 14-16 Bold Street, WA1 1DE          01925 415176  <a href="mailto:Warrington.referrals@cgl.cjsm.net">Warrington.referrals@cgl.cjsm.net</a></p>
Voluntary Services	<p>City Hearts (NW Regional Office): 0151 329 2949          Hestia: 0207 378 3100          Palm Cove Society (Leeds/ Bradford): 01274 722 765/ 0113 230 2771</p>
Other useful strategic contacts:	<p>Warrington Safeguarding Partnerships Team: 01925 443126  <a href="mailto:Safeguardingpartnerships@warrington.gov.uk">Safeguardingpartnerships@warrington.gov.uk</a></p>



## Additional Information

For more information on modern slavery, contact the organisations listed below who can give you further advice and guidance.

Gangmasters and Labour Abuse Authority	<a href="http://www.gla.gov.uk">www.gla.gov.uk</a> PO Box 10272, Nottingham, NG2 9PB Intelligence team: 0115 959 7052 <a href="mailto:Intelligence@gla.gov.uk">Intelligence@gla.gov.uk</a>
UK Human Trafficking Centre (part of National Crime Agency)	<a href="http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre">www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre</a> 0370 496 7622
Salvation Army	UK charity providing support and advice. Key contact for victims in England & Wales. <a href="http://www.salvationarmy.org.uk">www.salvationarmy.org.uk</a> 0300 303 8151 (24 hour referral line)
Migrant Help	UK charity providing support and guidance. Key contact for victims. <a href="http://www.migranthehelp.org">www.migranthehelp.org</a> 01304 203 977 Out of hours: 07766 668781
NSPCC Child Trafficking Advice Centre	Specialist service providing information and advice <a href="http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-trafficking/legislation-policy-guidance">www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-trafficking/legislation-policy-guidance</a>  0808 800 5000 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>

HMRC is committed to the cross government strategy to tackle modern slavery. HMRC is not a ‘first responder’, however 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 crimes by targeting their finances, disrupting tax or welfare fraud.

Information should be provided to HMRC through their National Minimal Wage team.

[www.gov.uk/government/organisations/hm-revenue-customs/contact/national-minimum-wage-enquiries-and-complaints](http://www.gov.uk/government/organisations/hm-revenue-customs/contact/national-minimum-wage-enquiries-and-complaints)

Use the [form here](#) if you have concerns about:

- an employment agency
- working time limits (48 hour working week)
- National Minimum Wage
- the minimum wage when working in farming or agriculture