

Meg Hillier MP
Chair, Public Accounts Committee
House of Commons
London SW1A 0AA

By email

23 July 2018

Dear Meg,

FOLLOW-UP TO PUBLIC ACCOUNTS COMMITTEE HEARING OF 27 JUNE

I offered to write to the Committee to provide further information on some questions raised during the hearing.

Modern Slavery

Firstly, in relation to the reform of the National Referral Mechanism (NRM) and the timeline for change, the NRM reform programme is focused on achieving four key objectives:

- Quicker and more certain decision-making in which stakeholders and victims have confidence;
- Improved support for adult victims before, during and after the NRM;
- Improved identification of victims; and
- Improved support to child victims of modern slavery, who are supported outside the NRM.

There are three tranches of work underway to deliver the sixteen distinct reform projects, which will all be fully implemented by March 2020. The first tranche, which includes the transition to a new single competent authority (SCA) and roll-out of a digital referral and case-working system, will be completed by April 2019; the second tranche, which includes the procurement of a new Victim Care Contract, will be completed by March 2020; and the third tranche includes measures that we are working to implement as soon as possible. More detail on each of these measures can be found at **Annex A**. We have made good progress on the projects within each of the tranches of work and the successful and timely delivery of these projects continues to be a top priority for the department.

The Committee asked about monitoring standards of care for victims of modern slavery referred into the National Referral Mechanism and what role the Care Quality Commission (CQC) might take with this. Whilst the Salvation Army already undertakes safeguarding checks in safehouses, we recognise it is important to establish an independent regime as soon as possible. The Department is currently exploring

options for this and has had conversations with potential inspectorates and interested stakeholders. This has included dialogue with the CQC and the Independent Anti-Slavery Commissioner's office.

The Committee enquired about the timetable to recruit a new Independent Anti-Slavery Commissioner. The recruitment campaign is currently live with the intention to fill the post by the autumn. The Government remains committed to ensuring an Independent Anti-Slavery Commissioner is in post to fulfil the obligations set out in the Modern Slavery Act and we will work to ensure continuity and momentum in the role.

With regards to compliance with Section 54 of the Modern Slavery Act, the Department will be: developing a list of companies in scope and using this to write directly to Chief Executives; improving the Home Office's guidance and resources for companies; and establishing a Transparency in Supply Chains Advisory Group to shape the approach to compliance. We will also be working with the Business Against Slavery Forum to share best practice and increase support for businesses with fewer resources and capacity. I also wanted to clarify that the Business Integrity Hub is an initiative being led by the Department for International Trade and the Department for International Development to support UK companies to do business with integrity in overseas markets including by preventing and tackling modern slavery and human rights risks in their supply chains.

The Committee made enquiries about the governance and outputs of the Police Transformation Fund (PTF) modern slavery programme. Governance for the programme is provided by a Strategic Oversight Board, comprising representatives from the police, Home Office and National Crime Agency (NCA), alongside Caroline Haughey QC, who supports the Police and Crime Commissioner for Devon & Cornwall (responsible for oversight of the grant). The Board provides reports to the Home Office and to the National Police Chiefs Council. Chief Constable Shaun Sawyer is the Senior Responsible Officer for the programme. The impact of the programme is monitored nationally by the NCA Strategic Tasking Group, Strategic Coordination Group and National Threat Group, and data on the police operational response is provided to the Cabinet Office Implementation Unit. An independent audit of the programme, commissioned by PCC Alison Hernandez, praised the project management and accountability measures in place. In line with other police transformation grants, the programme provides regular management and scrutiny information to the Home Office and, where appropriate, other government departments.

In regard to the outputs of the police transformation modern slavery programme, this includes specialist support, advice and intelligence checks provided to over 700 investigations taking place in England & Wales. This is provided through teams established inside Europol and the Regional Organised Crime Units. The programme provides a framework for supporting and tracking individual forces' progress against the national policing action plan. The analytical teams established by the programme provide data about the nature of the problem and effectiveness of the police response which is unmatched by that of other crime types. Investigators can now more easily make connections with other officers conducting similar enquiries and there is increased international coordination through Empact and an uplift in the number of Joint Investigation Teams. The programme also provides extensive training opportunities, with the training rolled out so far summarised at **Annex B**.

The allocation for the Police Transformation Fund (PTF) in 2019/20 will be announced by Ministers as part of the decision on the Police Funding Settlement for the same period. This will be determined against the wider police and departmental funding positions leading towards early priorities for the next spending review. Once the PTF allocation for 2019/20 is announced, the Police Reform and Transformation Board (PRTB) will make recommendations to Ministers on its use. This will include plans for the PRTB's Reform Portfolio, which consists of major police-led national programmes and existing projects profiled to receive grant funding continuing in to 2019/20.

The Department is working with the Modern Slavery Police Transformation Programme, Devon & Cornwall Police and the NCA to identify which capabilities could be mainstreamed into existing police activity and which would still require funding from separate streams.

The Border

Tackling human trafficking and modern slavery, both in the UK and overseas, is a priority for the government. World-leading action enabled by the Modern Slavery Act 2015 gives law enforcement agencies the tools to tackle modern slavery and also provides new protection for victims. At the primary checkpoint, Border Force Officers have the unique advantage of being the first point of contact with UK authorities for many vulnerable children and adults as well as the criminals who traffic them and as such has a vital role in identifying victims and perpetrators as they arrive in the UK and preventing modern slavery from happening.

You asked about the percentage increase in the number of referrals of potential victims of modern slavery at the border. The figures taken from data published by the NCA on Potential Victims of Modern Slavery (PVoMS) referrals are as follows:

Published Data	2016	2017	Percentage Change
PVoMS Referrals by Border Force to NCA	111	140	26%

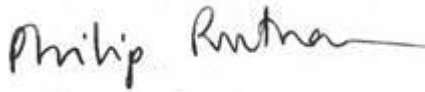
The increase can be attributed to enhanced training of Border Force Officers and operational intensification in conjunction with other law enforcement partners, and shows that our response is working effectively.

In addition, the total number of Counter-Terrorism referrals was higher than stated at the hearing, with the latest figures at 4,945 referrals rather than about 3,500. It should be noted, however, that these statistics have been taken from a live operational database and as such, numbers may change as information on that system is updated. Border Force is in a strong place to perform a pivotal role with other law enforcement partners in the fight against terrorism, as well as organised crime and illegal migration. Border Force officers make large numbers of referrals of passengers to Special Branch counterparts every week. Officers have increasingly become adept at exploiting the unique point of intervention presented by the UK border which has proved to be a critical line of defence.

EU Exit

The Home Office has been allocated £395m in 2018/19 to deliver EU Exit. £165m will be invested in systems and resource to deliver the EU settled status scheme. A further £150m has been allocated to ensure that our borders are more resilient during a period of uncertainty; the funding will support the recruitment and training of up to 1,300 more staff as well as the systems and infrastructure to ensure the continuing flow of goods and people at the border. £30m has been allocated to fund wider Home office activity covering security, policy, passports and project management. £30m is supporting the delivery of the Sandhurst agreement. We have retained £20m to manage programme risk. The allocations set out above will build resilience and capability across a variety of outcomes, including the scenario that the UK leaves the EU without a deal. Future year expenditure will be dependent on the outcomes of negotiations.

Yours sincerely,

A handwritten signature in black ink that reads "Philip Rutnam". The signature is written in a cursive style with a long horizontal stroke at the end.

Sir Philip Rutnam
Permanent Secretary

Annex A

NRM Reform

Since announcing the package of reforms in October, we have been putting implementation plans in place and have begun the implementation of a number of projects. There are three broad tranches of work to deliver 16 distinct NRM reform projects:

The first tranche of work refers to measures of the reform that will be implemented in the medium-term (by April 2019). The projects included in this tranche of work are:

- **Single competent authority (SCA)**- An SCA will replace the existing case-working teams and manage all NRM cases, regardless of nationality, providing high quality, timely decisions for victims.
- **Digital referral and case-working system**- A digital system to support the NRM process, making it easier for those on the front line to refer victims and enabling data to be captured and analysed to better aid law enforcement.
- **Independent quality assurance panels**- The introduction of multi-agency, expert panels that will quality assure all provisional negative conclusive grounds NRM decisions, before the decision is notified to the potential victim. The panel will not have the ability to overturn decisions, but can make a reconsideration request to the SCA.
- **Review of the role of first responders, including training needs**- To strengthen the role of First Responders, produce a list of first responders, design a consultation on first responders (including Government redlines on who will be a first responder and how first responders will discharge their role), develop a training package for first responders and ensure the first responder work is compatible with the requirements of the new digital NRM, ready for roll-out of the new system
- **Improving how ‘child-friendly’ the NRM process** - To develop a more child friendly approach to NRM decision-making, including consider how we communicate NRM decisions to child victims.

Since October 2017 we have made significant progress on the projects in this tranche of work which includes successfully appointing an interim head for the new SCA and reviewing the existing training for First Responders. We have also successfully secured resource from the Continuous Improvement (CI) team in the Home Office who have put forward recommendations (following 4 months of working with UKVI and NCA) on how to make the decision-making process more efficient in the new SCA.

Between autumn 2018 and April 2019 we will establish a shadow competent authority that will begin using the new digital case-working system and improved decision-making process (developed based on CI recommendations). We will have a small number of First Responder organisations begin using the digital referral form, and test a new training package with those First Responders. We will also continuously test and improve the new digital system and decision-making process

with the view of gradually increasing the number of case-workers in the shadow SCA, First Responders using the digital referral form, and cases reviewed by the multi-agency panel.

The second trench of work consists of measures that **will be implemented in the longer-term (by March 2020)**. A number of NRM reform measures need to be delivered through the new Victim Care Contract (VCC) which, will be in place from March 2020. These measures include:

- **Places of safety**- Places where victims rescued out of exploitation can stay and receive early advice, for up to 3 days before deciding if they want to enter the NRM.
- **Introduction of minimum care standards and inspection regime** - develop an inspection regime, based on the Trafficking Survivor Care Standards. This will be included in all future victim care contracts, and brought in to the current contract as soon as possible.
- **Drop-in support** - Establish weekly 'drop in' hubs that confirmed victims can access for up to six months after leaving NRM support

This tranche of work is on track for delivery by March 2020. We are building both the places of safety and drop in support into the new VCC re-tender. We will begin market engagement from autumn this year, with a view to commencing the competition in April 2019. We are currently working with a range of stakeholders to inform the market engagement process in relation to these measures, who are positive about the proposed timescales. We have made good progress are working with NGOs and other commissioning services to understand current best practice, challenges and demand levels for services that are akin to our places of safety model.

The last tranche of the work comprises those NRM reforms that do not need to be linked to the timeline for establishing the new Single Competent Authority or the re-tender of the Victim Care Contract. These measures are:

- **Testing pathways for victims exiting NRM support with local authorities** - Work with local authorities to test approaches to supporting victims to transition out of NRM support and into local communities.
- **Extending the period of move-on support** - Extend the move on period for confirmed victims from 14 days to 45 days, and for those confirmed not to be a victim from 48 hours to 14 days.
- **Aligning the modern slavery subsistence rates with asylum subsistence rates** - Alignment of subsistence rates for the essential living needs of potential victims of modern slavery with those received by asylum seekers.
- **Setting out victims' entitlements in regulations (under s50 MSA) and statutory guidance (under s49 MSA)** - Put the NRM on a statutory footing via regulations and statutory guidance under s50 and s49 of the Modern Slavery Act 2015.

- **Roll out of Independent Child Trafficking Advocates (ICTAs)** - Continue with national roll-out of ICTAs building on the lessons learned from the existing 3 early adopter sites.
- **Programme Evaluation** - To measure progress against the four high-level objectives of the NRM reform programme and better understand the implementation of actions under each strand.

We are working to implement these reform measures as soon as possible, and have made good progress on both the work to test pathways for victims with local authorities and with work to develop an evaluation framework.

Annex B

Police Transformation Fund - Modern Slavery Programme Training

- **Modern Slavery Partnership Conference** – A one day conference organised by the MSPTU in July 2018 to showcase good practice in relation to modern slavery partnerships. 300 scheduled to attend from police and local authorities.
- **Lead Investigator CPD Days** – 11 one day events delivered in March 2018, held across the country and designed to upskill those who are leading or supervising MSHT investigations.
- **Modern Slavery PCC/CC Conference** – Two one day conferences in February 2018 and July 2018, to update Police and Crime Commissioner's and Chief Constables about strategic issues.
- **Training for Analysts and Intelligence Officers** – One day conference in March 2018 held in Birmingham, designed to upskill Police and Law Enforcement Analysts. Attended by over 180 Analysts from Policing, DWP, GLAA, the Home Office and Europol. This is now being extended during 2018 and 2019.
- **Modern Slavery Specialist Investigators Course** – A four-day course designed to upskill PIP2 investigators (DC) and supervisors (DS) who are investigating MSHT offences. 19 courses delivered to date by the MSPTU at locations around the country to 362 investigators from 42 different forces.
- **Interviewing Vulnerable Victims and Witnesses ABE Upskill CPD Events** – Responding to the need to upskill officers trained to video interview vulnerable victims and witnesses.
- **Unlocking Slavery Roadshow** – 9 one day events held at Exeter January 2018, West Yorks January 2018, Cleveland January 2018, Manchester January 2018, Surrey January 2018, Derby February 2018, Bedfordshire February 2018, Birmingham February 2018 and Wales April 2018. Aimed at officers who are responding to or managing the early stages of a MSHT investigation.
- **Modern Slavery Awareness Module** – 2.5 hour training package designed for all frontline staff to help them spot the signs of Modern Slavery and Human Trafficking. Available to all forces via the Managed Learning Environment to deliver in force. This was supported by 6 one day "Train the Trainer" events run by the MSPTU between September 2017 and January 2018.