

Pwyllgor Cymunedau, Cydraddoldeb a
Llywodraeth Leol

Communities, Equality and Local Government
Committee

Cynulliad
Cenedlaethol
Cymru
National
Assembly for
Wales



Bae Caerdydd / Cardiff Bay
Caerdydd / Cardiff
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Lesley Griffiths AM
Minister for Local Government and
Government Business

26 June 2014

Dear Minister

Human Trafficking in Wales

The Committee has recently completed a short piece of [work](#) in relation to human trafficking. Members were particularly interested in the role of the Wales Anti-Human Trafficking Co-ordinator; the effectiveness of multi-agency working between UK and Welsh Government departments and other bodies such as health boards and the police; and the role of local authorities in identification and awareness raising of human trafficking.

To assist with this work, we contacted a number of key stakeholders to ask for their views. We also held oral evidence sessions with panels of stakeholders, as well as one session with you and the Anti-Slavery Coordinator. All [written submissions](#) are available on the Committee's webpage, as well as the transcripts of the oral evidence sessions on [20 November 2013](#), [28 November 2013](#) and [13 March 2014](#).

There are a number of important matters, identified below, that have arisen from these evidence sessions and we invite you to consider these.

It should be noted that, during the course of our work in this area, you announced changes in terminology in relation to human trafficking in order to bring the

language in line with that being used in work by the UK Government, as well as wider media coverage. These changes included replacing the term ‘human trafficking’ with ‘slavery’ and referring to victims of trafficking as ‘survivors’. The evidence we received pre-dates these changes and, for this reason, this letter uses the various terms interchangeably.

1. Awareness and evidence

The evidence we received made it clear that slavery remains a hidden and under-reported crime, and that the journey towards making Wales hostile to slavery is still at a relatively early stage. On this point, the WLGA told us that identification of victims is an on-going challenge and there is a need for multi-agency training to be supported by shared definitions, commonly understood, multi-agency processes and consistent use of the National Referral Mechanism (NRM). The WLGA argued this would ensure that victims were recognised as such, and not criminalised for the acts committed under the duress of traffickers.

We heard that, although some work has been undertaken in terms of awareness raising, there are still gaps in knowledge and understanding of the issues, particularly among frontline professionals in public services. On this point, Barnardo’s Cymru told us that some awareness raising and training had previously been undertaken in relation to child trafficking via a Welsh Government e-learning course, and that Local Safeguarding Children Boards had also delivered training locally on child trafficking in some areas. They suggested that giving professionals and practitioners more local control, involvement and access to a professional network of support and advice would help to advance these initiatives.

We have some concerns about the level of awareness of the role of the Anti-Slavery Coordinator among Police and Crime Commissioners (PCCs), as the evidence we received from two PCCs suggested there was a need for greater interaction between them and the Coordinator. On this point, the PCC for Gwent told us that the relationship between the Co-ordinator and the police force is very positive, but that there “probably needs to be more interaction between the AHTC and the PCC in relation to policy development and in future the link to victim services which will come within the PCC remit from October 2014.” We were pleased to hear that he had made contact with the AHTC to discuss these issues.

We were, however, particularly concerned about the response from the PCC for Dyfed Powys, in which he said he had not heard of the Anti-Human Trafficking Co-ordinator.

We were also concerned to hear evidence of a lack of engagement with certain public service departments, such as health and education. We agree with Bawso on this point that collaboration with these departments is vital because they can be the first port of call for victims of trafficking.

We understand that tackling slavery involves both devolved and non-devolved issues ranging from education and health, to criminal justice and immigration. We welcome the work being done by the Welsh Government and other agencies to raise awareness about slavery. However, we are concerned that awareness levels are still not sufficient, particularly among frontline professionals. We believe that continued efforts are needed to ensure that victims of slavery who report themselves to a police officer, health worker or teacher will receive a consistent and appropriate response. **We believe the Welsh Government should ensure closer working between the Anti-Slavery Co-ordinator and Police and Crime Commissioners and frontline professionals in the fields of health and education.**

We heard evidence about the pivotal role of local authorities in tackling human trafficking. Bawso highlighted Cardiff Council as an example of good practice in its creation of a Multi-Agency Anti-Human Trafficking Forum in 2012. We note that the Chief Executive of Denbighshire County Council is the lead official in relation to slavery on behalf of the Public Services Leadership Group (PSLG) and that his role is to raise awareness of slavery with other local authority Chief Executives across Wales.

We welcome the creation of a PSLG lead on anti-slavery and the work done so far in terms of awareness raising. We believe this principle should be extended so that every local authority has an anti-slavery lead officer who can be responsible for driving this agenda. **We believe the Welsh Government should encourage each local authority to have a lead responsible officer for anti-slavery, and that this person should be someone with Cabinet responsibilities in order that they are at a sufficiently senior level within the organisation to drive change.**

Publicity campaign

We note your evidence in relation to the Welsh Government's national publicity campaign to raise awareness about slavery. While we welcome this campaign as an awareness raising measure, we would like further information about its effectiveness, particularly as we received some evidence to suggest that awareness-raising through professional organisations would be a more effective approach. We acknowledge your evidence that it can be "difficult to monitor" the

effectiveness of publicity campaigns, but agree with you that this is “something the Welsh Government will have to look at.”

Further to this, the Association of Chief Police Officers told us that the Welsh Government should be wary of launching a publicity campaign without having the structure and resources in place to cope with any subsequent increase in referrals.

We believe you should establish a mechanism for monitoring the effectiveness of the Welsh Government’s anti-slavery publicity campaign.

In relation to concerns about the ability of victim support services to cope with an increase in referrals as a result of a national awareness raising campaign, we would like assurances from you that the budget allocated to these services will be kept under review.

Evidence base

We note that one of the Anti-Slavery Leadership Group’s primary strategic objectives is to build an evidence base using primary and secondary data sets to better inform the Leadership Group on the scale of slavery in Wales.

We agree with respondents that a stronger evidence base is crucial in order to target resources where they are most needed. We were pleased to hear from the Anti-Slavery Co-ordinator that he has been working on a secondary dataset to capture the number of victims beyond the official figures from the UK Government’s National Referral Mechanism.

We would like to receive an update from you on the progress of this project. Further to this, we believe that you should make arrangements for this secondary dataset and any other outcomes from this project to be published.

2. The Wales Anti-Slavery Coordinator

We note that the Welsh Government is the only government within the UK to appoint an Anti-Slavery Coordinator, whose aims are to make Wales a hostile place for slavery to exist and to co-ordinate the best possible support for victims.

We heard unanimous evidence that the establishment of the Coordinator was a positive step. On this point, Bawso told us “the effectiveness and achievements of the AHTC so far has been the coordination of initiatives to tackle human trafficking by forming a leadership group which brings together representatives

from key agencies (Police, Health, Education, Social Services, CPS and the third sector).”

In relation to the status of the Anti-Slavery Coordinator, we note this post is now part of the Violence Against Women and Domestic Abuse Team with the Welsh Government’s Community Safety Division. While there were some concerns raised about the independence of the Coordinator from the Welsh Government, other witnesses, including the current office holder, did not share these concerns.

In relation to the Coordinator’s resources, we heard from the WLGA that the role “has had relatively limited capacity or resources to drive the [anti-]slavery agenda forward to the extent that is needed”. **We believe you should put in place mechanisms to ensure that the resources available to the Anti-Slavery Coordinator, as well as those for victim support services, are closely monitored and provide value for money. We will want to re-visit this matter with you as part of our consideration of the Government’s draft budget for 2015-16.**

The UK Government’s Modern Slavery Bill

We note that the forthcoming Modern Slavery Bill is intended, among other things, to create a new UK Anti-Slavery Commissioner and regional co-ordinators. We received some evidence expressing concern about a lack of clarity regarding the role of the UK Commissioner and his or her interaction with the Wales Anti-Slavery Coordinator.

Responding to these concerns, you told us that the Welsh Government was feeding into the Bill, and that a protocol between the two governments to harmonise the new and existing work had been discussed. However, based on your evidence, we are not convinced that the Welsh Government has a clear understanding of how the Modern Slavery Bill will affect the Wales Anti-Slavery Coordinator’s role. **We believe you should pursue this as a matter of urgency with the UK Government, and we ask that you update us as soon as possible.**

We support the development of a protocol with the UK Government as part of the Modern Slavery Bill, not least as a means of ensuring that the position of the Anti-Slavery Coordinator in Wales is not adversely affected as a result of the provisions in the UK Bill. **We believe you should continue to pursue the development of such a protocol in order to ensure that roles of the Wales Coordinator and UK Commissioner are clearly defined and complementary. We ask that you keep us updated on progress in this matter.**

Further to this, we would welcome more information on the working arrangements between the Wales Anti-Slavery Coordinator and international agencies, and the impact that the provisions of the Modern Slavery Bill may have on these arrangements.

Linked to this, you also told us that funding may be made available to the Welsh Government as a result of the Modern Slavery Bill, but that the details were yet to be finalised. **We ask that you provide us with an update on the progress of negotiations in this area.**

Given the proposal for the creation of a statutory UK Commissioner, we explored with witnesses the merits of making the Anti-Slavery Co-ordinator's role statutory. There was some support for this. During our session with you, you confirmed that you had no plans to make the Coordinator's role statutory. **Given the importance of the role of Wales Anti-Slavery Coordinator, we believe you should give further consideration to making statutory provision for this. Such provision, accompanied by appropriate statutory powers, could strengthen the existing role and would give parity with any new UK Commissioner.**

The National Referral Mechanism

In relation to the UK Government's National Referral Mechanism (NRM), we heard from witnesses about concerns relating to under-reporting and a lack of training among First Responder organisations.

We note that referral to the NRM is voluntary and that, as such, many survivors of slavery choose not to refer themselves because of fear of deportation, prosecution or reprisals from criminal gangs. Without referral, however, victims are not able to access vital support services.

The voluntary referral provision also means that the NRM does not capture data in relation to those survivors who have been subject to some form of intervention but have not referred themselves. On this point, Barnardo's Cymru told us it was "very concerned by recent estimates that 65% of the total number of potential victims of trafficking are not recorded in the NRM."

In relation to training, we heard some evidence of a lack of training for First Responders in relation to using the NRM. Responding to this, you told us that a training programme was being rolled out across Wales which will "equip frontline practitioners with the understanding and the confidence to deal with and report incidents of slavery".

We believe the Welsh Government should raise concerns about the operation of the National Referral Mechanism with the UK Government, particularly around the voluntary nature of referrals, the impact of under-reporting and the importance of adequate training. We would like to receive an update from you in due course about the progress of the national training programme.

3. The Welsh Government’s Domestic Abuse, Gender-based Violence and Sexual Violence Bill

Given the growing concerns, both internationally and domestically, about slavery, we asked you whether this was something that would be included within the scope of the forthcoming Welsh Government Bill on gender based violence. You confirmed that your “intention is to have slavery in the Bill”. You went on to say that the “most important aspect of that legislation is to make sure that we have the most appropriate services for victims and potential victims. We are looking at how the relevant public bodies address violence against women, domestic abuse and sexual violence. (...). Within that, we can certainly look at slavery and the services that are being provided to support slaves.”

You also confirmed that you were looking at the education aspect of the Bill, particularly in relation to teaching young people about healthy relationships, and that you could consider slavery within that context.

It is imperative that slavery is recognised as a form of gender-based violence. With this in mind, we welcome the inclusion of slavery within the scope of the recent Welsh Government Review of Violence Against Woman, Domestic and Sexual Violence Services. **We believe the Welsh Government’s forthcoming Domestic Abuse, Gender-based Violence and Sexual Violence Bill should make specific provision in relation to slavery, particularly in relation to the aspects of the Bill that will provide for education programmes and training for frontline staff.**

4. Victim support

We heard evidence from respondents that there are gaps in current service provision, both geographically and demographically.

Geographical consistency

Witnesses, including Barnardo’s Cymru, told us they were encouraged to see local Anti-Human Trafficking Groups being established across the country. However, some had concerns that coverage is not comprehensive, with some areas of Wales

not having access to such groups. On this point, both Barnardo's Cymru and Bawso referred to a "postcode lottery" of responsiveness and service provision. We also heard from ACPO about inconsistencies in information sharing, intelligence sharing and structures across local authority areas.

We wish to draw this evidence to your attention, and ask that you give consideration to the need for geographical consistency of anti-slavery service provision across Wales and better information sharing arrangements by local authorities.

Accommodation

We heard evidence of concerns about the provision of safe accommodation for male victims of trafficking who, according to Bawso, represent "40% of the cases". Responding to this, you told us that there is no dedicated safe accommodation in Wales for male survivors that is funded by the UK Government. You said that the terms of Bawso's contract enable it to provide bed-and-breakfast accommodation and other support services locally to male survivors if required, but only if they are at risk.

Further to this, you told us that, while accommodation for victims is provided by the UK Government under contract, the Welsh Government has funded a specific project in north Wales, 'Diogel', since 2010 for female survivors and children.

While we understand that safe accommodation for victims of slavery is provided under contract from the UK Government, the Welsh Government has chosen to provide accommodation for women in north Wales. We believe that equivalent services should be available for men.

We believe that further work needs to be undertaken by the Welsh Government to improve the provision of safe accommodation particularly for male survivors of slavery.

Children and Young People

We heard evidence about opportunities for interventions to safeguard and protect trafficked children and young people at points of entry into the UK, including Operation Paladin at Heathrow Airport. We were also told of lessons that could be learned from work taking place in Scotland in relation to guardianship of unaccompanied minors. Witnesses suggested that similar approaches and services could be made available at all ports and airports in Wales and across the UK. On

this point, you told us that the guardian scheme in Scotland “is a good idea” and that you were planning a visit to Scotland to see the scheme in operation.

We support the principle of a guardianship scheme for unaccompanied minors and believe you should give consideration to establishing such a scheme in Wales, particularly given the concerns raised by children’s charities in relation to age assessments and children’s access to services.

I would be grateful if you would address each of the matters outlined above in your response. I look forward to hearing from you.

Yours sincerely

A handwritten signature in cursive script that reads "Christine Chapman".

**Christine Chapman AC / AM
Cadeirydd / Chair**