

# Liberate

## Liberate: *The Plan*

2018-2019

THE WEST MIDLANDS POLICE PLAN FOR  
MODERN SLAVERY AND HUMAN  
TRAFFICKING

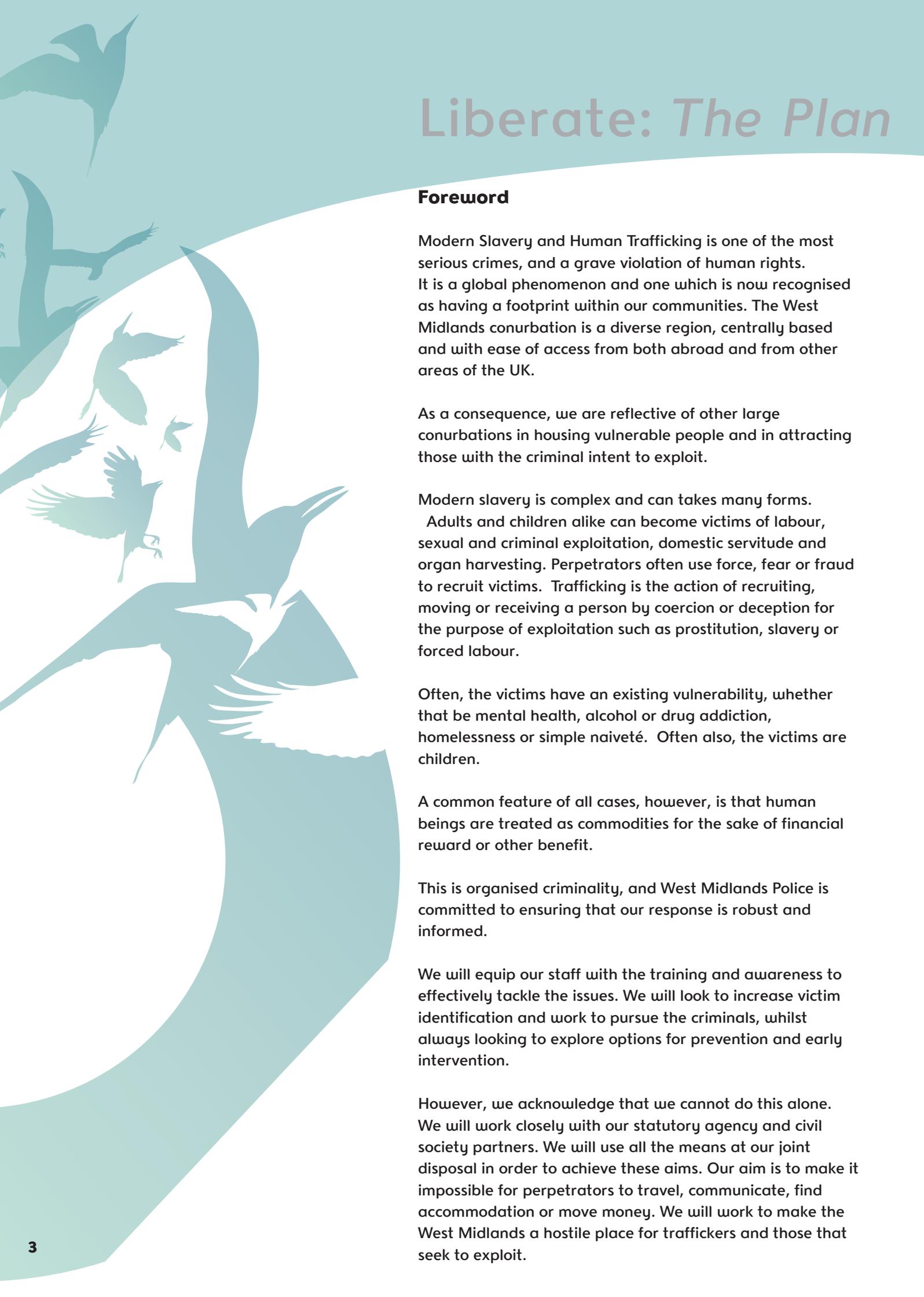




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## Foreword

Modern Slavery and Human Trafficking is one of the most serious crimes, and a grave violation of human rights. It is a global phenomenon and one which is now recognised as having a footprint within our communities. The West Midlands conurbation is a diverse region, centrally based and with ease of access from both abroad and from other areas of the UK.

As a consequence, we are reflective of other large conurbations in housing vulnerable people and in attracting those with the criminal intent to exploit.

Modern slavery is complex and can take many forms.

Adults and children alike can become victims of labour, sexual and criminal exploitation, domestic servitude and organ harvesting. Perpetrators often use force, fear or fraud to recruit victims. Trafficking is the action of recruiting, moving or receiving a person by coercion or deception for the purpose of exploitation such as prostitution, slavery or forced labour.

Often, the victims have an existing vulnerability, whether that be mental health, alcohol or drug addiction, homelessness or simple naiveté. Often also, the victims are children.

A common feature of all cases, however, is that human beings are treated as commodities for the sake of financial reward or other benefit.

This is organised criminality, and West Midlands Police is committed to ensuring that our response is robust and informed.

We will equip our staff with the training and awareness to effectively tackle the issues. We will look to increase victim identification and work to pursue the criminals, whilst always looking to explore options for prevention and early intervention.

However, we acknowledge that we cannot do this alone. We will work closely with our statutory agency and civil society partners. We will use all the means at our joint disposal in order to achieve these aims. Our aim is to make it impossible for perpetrators to travel, communicate, find accommodation or move money. We will work to make the West Midlands a hostile place for traffickers and those that seek to exploit.

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Together with partners, we will seek educate communities, to improve intelligence flow and to prevent victims and exploiters from being “hidden in plain sight”.

We will work alongside local businesses to ensure that they are not inadvertently complicit in the proliferation of this crime. We will work collaboratively to tackle exploitation within supply chains and will aim to drive improved intelligence flow by raising awareness within the relevant sectors.

Because this is a national and international crime type, we will seek and offer support, ideas and resources across the region and beyond in order to remain at the forefront of tackling this offending.

The West Midlands is a vibrant and diverse region where we show respect to people from all national backgrounds and all walks of life. Those who perpetrate modern slavery seek to deny members of our communities that respect and strip them of their humanity. This is unacceptable and will not be tolerated.

‘Liberate’ is the multi-agency and community partnership response to Modern Slavery in the West Midlands. We will drive this programme forward through the work detailed in this plan, with the overarching aim of eliminating slavery in our society.

*Detective Superintendent Nick Walton, Modern Slavery Lead,  
West Midlands Police*





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## **Introduction**

The purpose of the Liberate plan is to set out our approach for addressing the challenges posed by modern slavery and human trafficking (MSHT) in the West Midlands.

The crime type falls under the remit of both the national Modern Slavery strategy and the West Midlands Police Organised Crime Strategy. Both these strategies identify objectives for policing slavery and serious crime respectively, and both recommend that deliverables are developed around the '4 x P' model (Prepare, Pursue, Prevent, Protect).

We have incorporated into the plan the results of an inspection by Her Majesty's Inspectorate of Constabulary in March 2017. The inspection reported that some good awareness raising work had started with partners. However, front line personnel did not always understand or prioritise the crime type and that training and awareness was required. It also noted that the intelligence picture was incomplete and required further investment. It was observed that processes around the receipt and dissemination of modern slavery information required clarification. The inspection also identified that improvements were required to supervisory direction, the focus of secondary investigations and to the case file standard. Some nervousness was seen around dealing with modern slavery cases and inexperience, resourcing and capacity were cited as reasons for this. Support available from local points of contact, regional and national crime agency support structures required clarification.

This plan sets out the response of the West Midlands to these issues. It aims to clarify the objectives of police personnel and explain their responsibilities in this area of work. The document is also intended to clarify our vision and objectives for partners and communities, thereby facilitating joint efforts. It recommends relevant partner and community collaboration where this may be beneficial to progressing the deliverables listed.

This document is classified as unrestricted in nature and can be shared as desired. It is also a living document, intended to be updated monthly to maintain currency.

Many of the aims of this plan will only be achieved through joint efforts with partners and with the solid support of communities, rather than through policing alone. It is suggested that this document is read and interpreted in the light of this overarching principle.



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## **Strategic Vision**

Significantly reduce harm to communities in the West Midlands from modern slavery and human trafficking, through a co-ordinated and relentless partnership approach.

## **Our Values**

- I prevent crime.

We will work in partnership to identify and address the motivations and vulnerabilities which lead to MSHT offending and victimisation respectively. We will innovate in doing so and will share our work with the rest of the country to help raise standards nationally.

- I offer friendship and service.

We will raise awareness and build strong relationships with communities in order to serve them most effectively against the MSHT agenda. We will provide an effective response to MSHT which inspires confidence in communities.

- I am courageous and fair.

We will challenge ourselves, partners and businesses to do the right things by potential MSHT victims and to seek every opportunity to identify and pursue offenders. We will ensure that our service delivery is accessible to the harder to reach communities which make up our known risk groups for MSHT victimisation.

- I listen and learn.

We will seek the views of partners, victims and communities and strive to continuously raise service standards. We will ensure our training products properly prepare our personnel to deal with MSHT. We will learn from past mistakes in early investigations and ensure that future operations reflect the benefit of these experiences.

- I am proud of what I do.

We will ensure that every police officer and member of police staff across the organisation is aware of and equipped for their role in the effective handling of MSHT issues. We will hold ourselves to account against robust standards of effectiveness

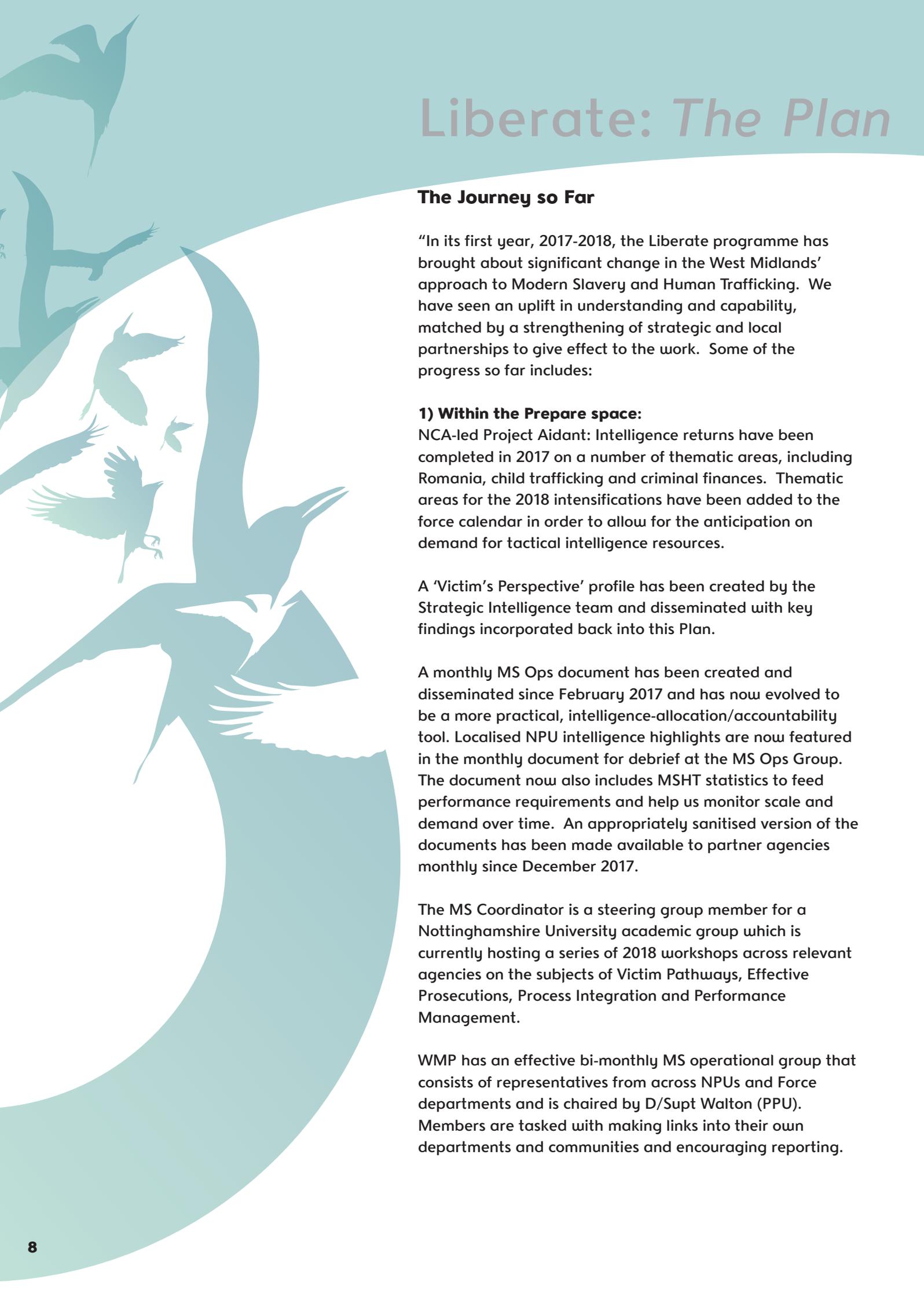


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## **Strategic Objectives**

The national Modern Slavery strategy is built on the successful framework which has previously been used to counter terrorism. The West Midlands Police Serious and Organised Crime Strategy also follows this framework. Following this lead, the strategic objectives to be delivered via this plan are therefore to:

- **PREPARE** in order to provide support to victims and communities and to reduce the impact of MSHT crime where it takes place.
- **PURSUE**, prosecute and disrupt people engaged in MSHT offending.
- **PREVENT** people from engaging or re-engaging in MSHT crime.
- **PROTECT** vulnerable individuals, businesses and communities against MSHT crime.



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## **The Journey so Far**

“In its first year, 2017-2018, the Liberate programme has brought about significant change in the West Midlands’ approach to Modern Slavery and Human Trafficking. We have seen an uplift in understanding and capability, matched by a strengthening of strategic and local partnerships to give effect to the work. Some of the progress so far includes:

### **1) Within the Prepare space:**

NCA-led Project Aidant: Intelligence returns have been completed in 2017 on a number of thematic areas, including Romania, child trafficking and criminal finances. Thematic areas for the 2018 intensifications have been added to the force calendar in order to allow for the anticipation on demand for tactical intelligence resources.

A ‘Victim’s Perspective’ profile has been created by the Strategic Intelligence team and disseminated with key findings incorporated back into this Plan.

A monthly MS Ops document has been created and disseminated since February 2017 and has now evolved to be a more practical, intelligence-allocation/accountability tool. Localised NPU intelligence highlights are now featured in the monthly document for debrief at the MS Ops Group. The document now also includes MSHT statistics to feed performance requirements and help us monitor scale and demand over time. An appropriately sanitised version of the documents has been made available to partner agencies monthly since December 2017.

The MS Coordinator is a steering group member for a Nottinghamshire University academic group which is currently hosting a series of 2018 workshops across relevant agencies on the subjects of Victim Pathways, Effective Prosecutions, Process Integration and Performance Management.

WMP has an effective bi-monthly MS operational group that consists of representatives from across NPUs and Force departments and is chaired by D/Supt Walton (PPU). Members are tasked with making links into their own departments and communities and encouraging reporting.

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Externally, WMP continues to play an important part in the West Midlands Anti-Slavery Network (WMASN) via representation by D/Supt Walton and DCI Simpson (MS leads). WMASN is the conduit into a wide variety of 3rd sector organisations and provides a 2 way reporting opportunity. WMP is also represented by the MS force leads at National MS NPCC conferences and has a strong footprint within the national picture. WMP Supt lead/ Regional coordinator represents at National working group bi-weekly conference.

In relation to awareness-raising, officers have delivered a number of presentations to landlords, homeless and women's groups across the force area. Large Polish community audiences were addressed at church and training provided to the committee of the Polish Expats' Society as part of NCA Operation Aidant in April 2017, which was showcased in Newsbeat and identified as an example of good practice by the NPCC.

During August 2017, WMP worked with the Nigerian Welfare Association and the National Association of Nigerian Communities, using FGM groups, business events and black community radio in order to raise the profile of domestic servitude. MS SPOCS are regularly leading at or contributing to local conferences and awareness sessions.

A generic 15 minute presentation about modern slavery, suitable for a lay community audience, has been created and disseminated via MS SPOCs and is also available on the Force MS page for NPTs wishing to use it. A21 anti-slavery posters have been co-branded 'Liberate' and supplied to front offices and A&E departments across the force area. Also, several recent MS operations have received favourable media coverage.

An NCA-led public place pop-up exhibition campaign was executed for 3 days in Coventry city centre in February 2018.



*Nigerian Welfare Association*



*Newstyle community radio*



*St Stanislaus Kostka Catholic Church*



*Coventry Modern Slavery Exhibition*

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*NHS-led Liberate campaign van*

Soft debriefs have been conducted in Coventry with Vietnamese and Afghanistani children alongside Barnardos and the NCA, with the learning informing national strategy. A Multi-agency NHS led Liberate campaign was launched at Birmingham Grand Central in March 2018 and is scheduled to repeat over May and June 2018 in a number of locations in Solihull and Birmingham. The campaign utilises a number of tactics including a theatre group enacting scenes of slavery, a media stunt including a van as is frequently used to move slaves about and a poster campaign inviting people to apply for nail bar, car wash and agricultural work where they lose the freedom to leave and earn 70p an hour.



*Partnership table top exercise*

A partnership training day was held in September 2017 in Bilston. A further event took place on anti-slavery day (18 October 2017) at Tally Ho, in partnership with local business and to raise awareness of supply chain slavery.



*Anti-slavery day event*

Internally, all forced marriage and honour based abuse presentations delivered to partners (through Operation Sentinel) include training and awareness on slavery, specifically domestic servitude and forced labour.

Training has been delivered to supervisors from all departments; it has now been included in ICIDP and Student Officers courses.

An MS webpage is active on the PPU website which provides advice and guidance.

[http://intranet2/force\\_operations/sentinel/modern\\_slavery.aspx](http://intranet2/force_operations/sentinel/modern_slavery.aspx) This was refreshed in April 2018 and includes dedicated pages and an investigative toolkit for modern slavery.

14 staff from NPUs and Investigation teams have been trained as MS tactical advisors. This 4 day course will soon be licensed to WMP for regional delivery.

A video box training series has been created and disseminated to all frontline officers and staff in April 2018 and can be found here: <http://training/videos/liberate/>.

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*Filming of Video Boxes*

On 28 February 2018, over 100 WMP officers were trained for a full day at Tally Ho! by the National Modern Slavery Police Transformation Team, on providing a competent first line response to MSHT.

A 2018 training calendar for MSHT has now been created to manage demand across the year.

Learning distilled from 108 MS investigations following an HMIC inspection in March 2017 has been cascaded by DI Mattinson to CID and PPU staff.

SOBAD debriefs have taken place for Operations Robotic and Bin and the findings have been absorbed into this plan.

An investigative table top exercise was held in October 2017 at Tally Ho for PPU and CID investigators alongside investigative partners.



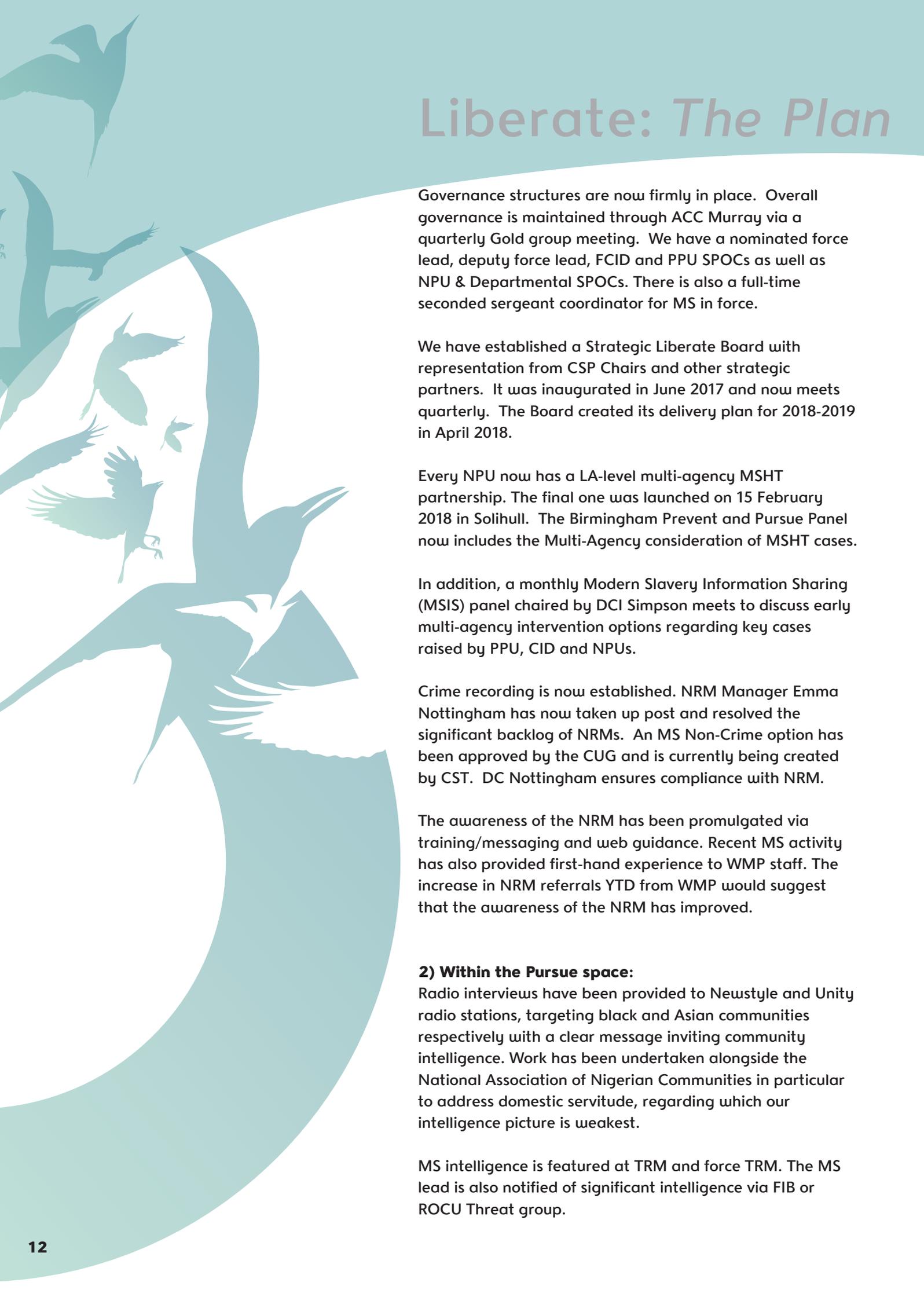
*Investigative table-top exercise*

Internal and multi-agency dip sampling of the quality of MSHT investigations took place in April and March 2018 respectively.

FCID investigative advisor DS Poole now has oversight of all labour exploitation jobs in force. PPU investigative advisor DS Dhindsa has similar oversight of sexual exploitation jobs. Overall oversight is maintained via these SPOCs by force lead Detective Superintendent Walton on a monthly basis, with particular attention to the 10 highest risk MORILE-scored cases from both departments.

In relation to Reception Centres, a number of premises which can be used as such across the force have been identified and details supplied by officers to the regional MS coordinator for collation. The provision of Reception Centres is also a priority of the Strategic Liberate Board delivery plan.

Regarding intelligence, there are clear lines of dissemination of relevant MS intelligence to NPU TRM (and force TRM when required). ROCU provide a regional service and have analyst Richard Davies to coordinate a regional intelligence picture and develop networks.



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Governance structures are now firmly in place. Overall governance is maintained through ACC Murray via a quarterly Gold group meeting. We have a nominated force lead, deputy force lead, FCID and PPU SPOCs as well as NPU & Departmental SPOCs. There is also a full-time seconded sergeant coordinator for MS in force.

We have established a Strategic Liberate Board with representation from CSP Chairs and other strategic partners. It was inaugurated in June 2017 and now meets quarterly. The Board created its delivery plan for 2018-2019 in April 2018.

Every NPU now has a LA-level multi-agency MSHT partnership. The final one was launched on 15 February 2018 in Solihull. The Birmingham Prevent and Pursue Panel now includes the Multi-Agency consideration of MSHT cases.

In addition, a monthly Modern Slavery Information Sharing (MSIS) panel chaired by DCI Simpson meets to discuss early multi-agency intervention options regarding key cases raised by PPU, CID and NPUs.

Crime recording is now established. NRM Manager Emma Nottingham has now taken up post and resolved the significant backlog of NRMs. An MS Non-Crime option has been approved by the CUG and is currently being created by CST. DC Nottingham ensures compliance with NRM.

The awareness of the NRM has been promulgated via training/messaging and web guidance. Recent MS activity has also provided first-hand experience to WMP staff. The increase in NRM referrals YTD from WMP would suggest that the awareness of the NRM has improved.

## **2) Within the Pursue space:**

Radio interviews have been provided to Newstyle and Unity radio stations, targeting black and Asian communities respectively with a clear message inviting community intelligence. Work has been undertaken alongside the National Association of Nigerian Communities in particular to address domestic servitude, regarding which our intelligence picture is weakest.

MS intelligence is featured at TRM and force TRM. The MS lead is also notified of significant intelligence via FIB or ROCU Threat group.



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Intel currently reviews ongoing MS operations to provide update to the National Operations Coordination Group meeting bi weekly.

D/Supt Walton maintains operational oversight of MSHT investigations via a monthly 'oversight meeting' with FCID and PPU SPOCs.

ACC Murray chairs the Gold Group meeting which updates regarding all on-going MS operations in WMP/ROCU (where appropriate).

We provide a proportionate investigation to all reports of MS, by a suitably qualified member of staff.

CPS MS lead Debbie Gould has featured in the WMP MS training videos for frontline Officers, as has GLAA regional lead Andy Davies. GLAA are also a key member of the above-mentioned MSIS panel.

A working group chaired by DCI Mattinson has established a process in relation to incoming SARs. They are now converted into intelligence reports and directed to the appropriate department to action.

### **3) Within the Prevent space:**

The centre point for referrals is established as the MSHTU for daily operational activity, the WMP operational group for WMP processes and WMASN/ROCU threat group for wider 3rd sector or other law enforcement contact. There is a locally established network of statutory and voluntary partners who regularly meet and communicated via email.

Op Sentinel KIN and the WMASN provides access to community groups. Particular engagement activity has occurred in relation to Polish, Romanian, Nigerian and Vietnamese communities, as part of the force response to Project Aidant 2017 intensifications.

A presentation has been created and disseminated to NHTs to share with community groups in order to raise awareness of MSHT. MS has now become normal business for NHTs who regularly conduct safeguarding visits following community information.

Funding has been agreed through the OPCC for 2 full time engagement officers, to be positioned within local NGOs but tasked through the WMP MS Coordinator.

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Survival theft and criminal exploitation are themes explored in the modern slavery frontline training videos.

In relation to banks, CV are piloting MS interventions in Natwest's 'Little Book of Scams' which can be rolled out to other banks across the West Mids if successful. Barclays have also been provided with a list of indicators and a 3 postcodes, and are piloting a scheme whereby they look for those indicators across accounts in those areas, and report them via SARs.

DSupt Walton, DCI Simpson and Ali Naqvi are attendees at the Regional Anti Slavery Network meeting and use this forum to share relevant information.

On 18th October 2017, a WMASN event took place at Tally Ho, which was attended by over 50 local businesses. The focus of the event was 'Supply Chain Slavery' and delegates pledged to prevent and address MSHT issues in their own organisations.

An end-to-end partnership table top exercise took place in September 2017 in Wolverhampton. Its outcomes are now being used to create a 'Pathways App' for all partners.

Ali Naqvi has now collated and maintains a list of all STROs and STPOs on a shared drive.

#### **4) Within the Protect space:**

MS SPOCS have been working locally with LA and partners to promote intelligence flow, through joint training and conferences- such as the Sandwell MS conference in January 2018 and the Dudley partnership MS training day in April 2018.

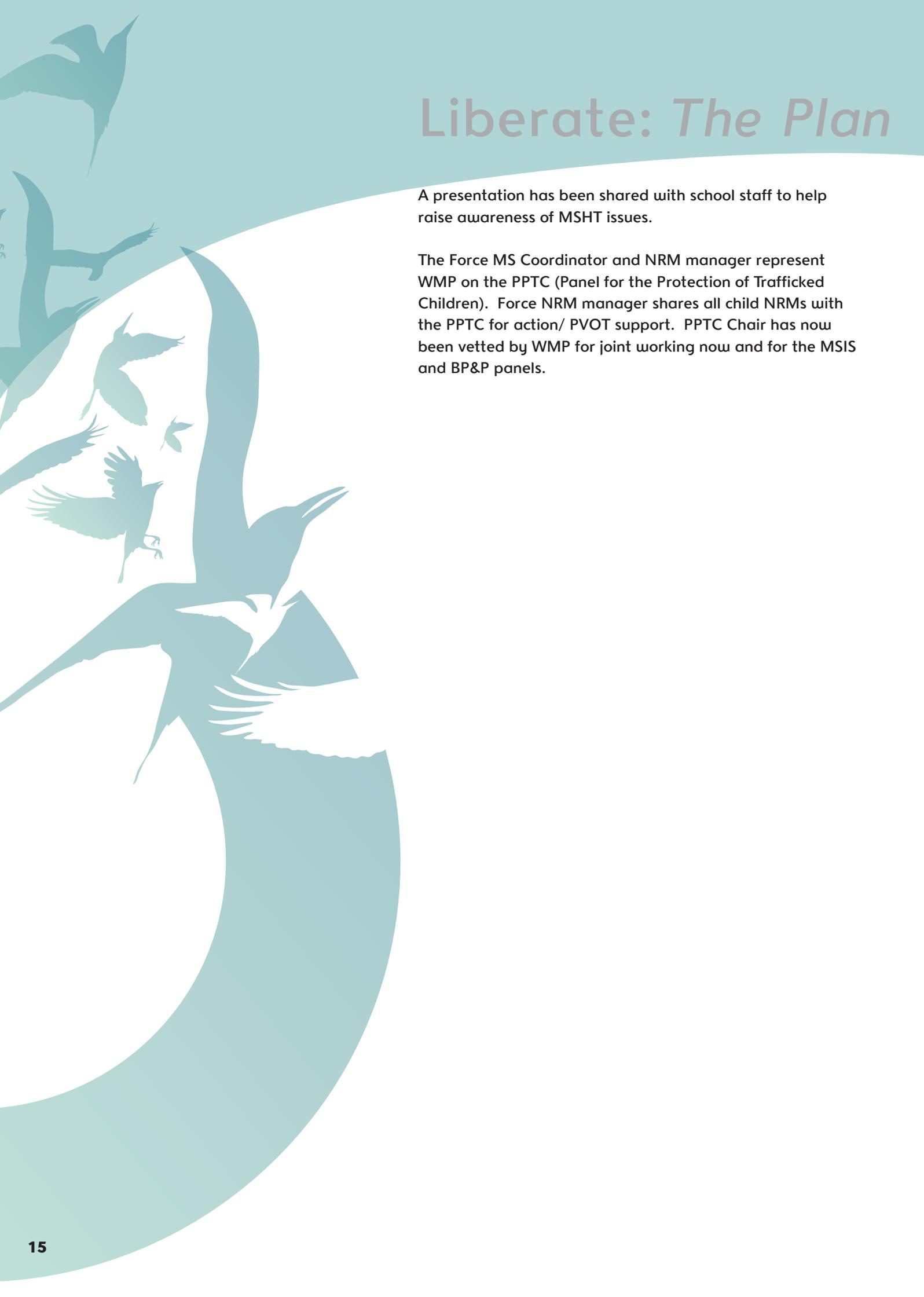
There is now a WMASN Intelligence Task and Finish Group Intelligence plan in place to increase referrals/criming.

PS Gallier gave a presentation regarding organised immigration crime to MS Ops Group in April 2017.

A PNC marker for PVOTs has been created in June 2017 and is being attached to all PVOTs.

WMP worked closely with Barnardo's to hold a conference to raise issues and share learning in May 2017.

Departmental ownership/ remit is now established and understood in relation to different types of MSHT offending against children.



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A presentation has been shared with school staff to help raise awareness of MSHT issues.

The Force MS Coordinator and NRM manager represent WMP on the PPTC (Panel for the Protection of Trafficked Children). Force NRM manager shares all child NRMs with the PPTC for action/ PVOT support. PPTC Chair has now been vetted by WMP for joint working now and for the MSIS and BP&P panels.

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## Objective 1:

### **PREPARE: Prepare for the threat of Modern Slavery and Human Trafficking**

The National Modern Slavery Strategy aims to:

- Proactively identify and recognise victims of modern slavery.
- Provide victims of modern slavery with appropriate and effective support.
- Provide specialist support to child victims of modern slavery.
- Support the reintegration of victims into society.
- Support victims and witnesses of modern slavery through court proceedings.
- Ensure effective safeguards to prevent victims being criminalised.

The Force Serious and Organised Crime Strategy tactical objectives are to:

- Develop and joint intelligence capability with law enforcement and partner agencies to better understand and prioritise the threat from serious and organised crime. Produce one view intelligence products by combining and assessing information from different law enforcement and partner agencies.
- Prioritise our activity against individuals and networks based on the totality of the threat that they pose.
- Establish multi-agency workshops to identify prevent, protect and pursue opportunities locally, regionally and nationally.
- Review existing governance and tasking arrangements regarding all aspects of the serious and organised crime strategy.
- Ensure a clear 4 P delivery plan for each Local Policing Unit that sets out how they will tackle the threat of violent, serious and organised crime.
- Monitor performance outcomes and engage with suitable academic institutions to ensure any findings have a firm evidence base and are robustly evaluated.
- Continue to improve our policies and procedures in relation to – governance, accountability, tasking, tackling serious and organised crime, debriefing, budget management, continuous improvement.
- Improve our engagement with communities, victims and witnesses affected by serious and organised crime.



# Liberate: The Plan

1.1 Topical Problem Profiles	
Task	Create bi-monthly problem profiles to service national intelligence requirements and also drive force activity under NCA-led Project Aidant
Method	Prepare relevant problem profile according to thematic intensification areas.
Actioned by	Ali Naqvi
Owned by	Tactical intelligence
Work outstanding	This task will require servicing on an indefinite, bi-monthly basis.
RAG status	

1.2 Victim Experience	
Task	Create and share a profile of the MS 'victim experience' to inform future service delivery.
Method	Extract opportunities to improve service quality from the cited experiences of MS victims.
Actioned by	Simon Whincup
Owned by	ACC Murray
Work outstanding	Profile completed and disseminated to key stakeholders. SI analysts to update findings at May Ops group meetings
RAG status	

1.3 Monthly intel document	
Task	Create and disseminate monthly MS operational update document to drive Ops Group activity.
Method	Include monthly operational updates, emerging trends and available intelligence.
Actioned by	Ali Naqvi
Owned by	Tactical intel
Work outstanding	Both the internal and partnership versions of the document will continued to be supplied on a monthly basis in advance of Ops Group. From May 2018, the internal version will include a local version of the regional performance management tool."
RAG status	

1.4 Community engagement	
Task	Engage with local: community groups, charities, religious groups and outreach teams to raise awareness of slavery and encourage reporting/ information sharing.
Method	We will: <ul style="list-style-type: none"> <li>• Develop partnership arrangements with these community and voluntary groups.</li> <li>• Utilise communications plans to support our MS-based relationships.</li> <li>• Sustain and improve partnership working</li> </ul>
Actioned by	LPU Sentinel Leads/Partnerships officers and MS Ops Groups Reps
Owned by	MS Coordinator Khizra Dhindsa
Work outstanding	Look for further opportunities to seek media coverage of MS issues - Ops groups members and wider MS network to be asked to seek such opportunities.
RAG status	

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1.5 Reception centres	
Task	Ensure there are plans with Local Authorities/ Housing to provide reception centres to temporarily accommodate potential victims both pre and post NRM.
Method	<ul style="list-style-type: none"> <li>• Develop partnership arrangements</li> <li>• Utilise communications plans to support strategy</li> <li>• Sustain and improve partnership working</li> </ul>
Actioned by	NPU MS SPOCs
Owned by	Regional coordinator Jason Grove
Work outstanding	Task has been issued through the Strategic MS Group for all LA CSP leads to identify suitable reception centres for pre-planned operations to cater for a variety of PVOT numbers. Responses are due at the June 2018 Strategic MS Group meeting. Details of suitable potential Reception Centres to be collated by Jason into a centralised force directory/calendar, accessible to SIOs via the force coordinator.
RAG status	

1.6 Partnership intelligence collection	
Task	Develop an intelligence collection plan to gather local to global intelligence from law Enforcement / partners and NGOs.
Method	<ul style="list-style-type: none"> <li>• Enhance intelligence and data collection</li> <li>• Develop partnership arrangements</li> </ul>
Actioned by	Ali Naqvi
Owned by	Tactical intel
Work outstanding	<ul style="list-style-type: none"> <li>• Continual engagement with Op Trivium to increase our intelligence capture on EU workers travelling out of WM area to work on farms/factories (next phase November 2017).</li> <li>• Intelligence debriefs to be embedded within prisoner handling processes for low level volume crime.</li> <li>• Recommendation 4 of the October 2017 HMIC report on MSHT requires forces, by April 2018, to have in place active information-sharing agreements with other agencies to facilitate the speedy exchange of intelligence in order to safeguard victims and identify suspects early.</li> <li>• Recommendation 2 also states that forces should develop effective partnership arrangements to coordinate activity in order to share information and safeguard victims.</li> </ul>
RAG status	

1.7 Robust Structures	
Task	Ensure structure from local to national is secure for both information exchange, intelligence sharing and safeguarding
Method	Establish and maintain suitable local structures and contribute to regional and national ones.
Actioned by	Ops group SPOCs
Owned by	DSupt Walton DCI Simpson ROCU
Work outstanding	<p>NPU SPOCs to report to Ops Group regarding emerging partnership MS structures at NPU level.</p> <ul style="list-style-type: none"> <li>• Recommendation 2 of the October 2017 HMIC report on MSHT requires forces to review their leadership and governance arrangements for MSHT by October 2018, which is the objective of this deliverable.</li> <li>• It particularly mentions that senior leaders should prioritise the response to MSHT.</li> <li>• MSHT is currently neither a strategic nor tactical priority for WMP</li> </ul>
RAG status	

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1.8 Frontline training	
Task	Provide training to front line Staff to raise awareness of modern slavery issues, the National Referral Mechanism and primary investigation considerations.
Method	<ul style="list-style-type: none"> <li>• Utilise communications plan to support strategy</li> <li>• Increase organisational understanding</li> </ul>
Actioned by	L&D Denise Dolan & MS Coordinator Khizra Dhindsa
Owned by	MS Bronze DCI Simpson
Work outstanding	<p>New Team Talk slide to be circulated Autumn 2017</p> <p>Video box series for frontline briefings has been filmed and is currently under editing before dissemination by end of November.</p> <p>National transformation team have released a 2 hour awareness package for delivery to frontline personnel and partners. WMP staff will be trained as trainers by the COP on 9th November 2017.</p> <p>As the first responders in MSHT cases are usually response and neighbourhood officers, this deliverable seeks to satisfy that part of Recommendation 2 of the October 2017 HMIC report on MSHT, which requires forces to ensure that every incident of modern slavery identified to police is allocated appropriate resources with the skills, experience and capacity to investigate it effectively.</p>
RAG status	

1.9 Training secondary investigators	
Task	Provide training to FCID/PPU investigators on modern slavery investigative techniques, the National Referral Mechanism, trafficking risk orders and best practice.
Method	<ul style="list-style-type: none"> <li>• Increase organisational understanding of 'vulnerability' and take action</li> <li>• Ensure new legislation and policy is understood</li> <li>• Acknowledging, learning, cascading</li> <li>• Increase organisational understanding</li> </ul>
Actioned by	DCI Mattinson DI Martin DS Groutage
Owned by	MS Bronze DCI Simpson
Work outstanding	<p>12 further FCID and PPU officers will be trained by April 2018 to the national standard, as MSHT specialist advisors.</p> <p>This deliverable seeks to satisfy Recommendation 8 of the October 2017 HMIC report into MSHT, which requires forces to ensure that allegations or indicators of modern slavery and human trafficking are thoroughly investigated and effectively supervised by teams and individuals with the skills and experience to undertake them.</p>
RAG status	

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1.10 Media campaign	
Task	Engage with the community via Media to raise awareness of modern slavery and human trafficking issues and, support the capture of community intelligence.
Method	<ul style="list-style-type: none"> <li>• Increase organisational understanding of 'vulnerability' and take action</li> <li>• Ensure new legislation and policy is understood</li> <li>• Acknowledging, learning, cascading</li> <li>• Increase organisational understanding</li> </ul>
Actioned by	Amy Haycock
Owned by	MS Bronze DCI Simpson & NPU Bronzes & Corporate Comms
Work outstanding	<p>Liberate website to be constructed</p> <p>Consideration given to inviting media on MS operations - to continue awareness raising</p> <p>WMP has just agreed to support the BBC in their appetite to make a documentary regarding Modern Slavery.</p> <p>Identify and use ethnic media to target high risk communities.</p> <p>Create a Liberate twitter account.</p> <p>Execute a social media pop-up campaign.</p>
RAG status	

1.11 STO availability	
Task	Ensure adequate levels of STO trained staff are deployable 24/7 within agreed deployment Timescales (1 hour deployment for incident within forensic window of 7days).
Method	<ul style="list-style-type: none"> <li>• Instigate performance measures</li> <li>• Encourage our communities to come forward</li> </ul>
Actioned by	DI Martin
Owned by	MS Bronze DCI Simpson & SOTs Leads
Work outstanding	<p>STO provision is currently under review by DCI Simpson. We have invited GMP to review our STO provision through their WMP peer review.</p> <p>Also being reviewed as part of the PPU change programme.</p>
RAG status	

1.12 WMP regional and national representation	
Task	Provide representation at regional and national modern slavery groups and, develop intelligence sharing and reporting frameworks from 'local to global' to share Information and best practice.
Method	<ul style="list-style-type: none"> <li>• Improve National cohesion</li> <li>• Enhance intelligence and data collection</li> <li>• Enhance our knowledge, understanding and response</li> </ul>
Actioned by	MS Coordinator Khizra Dhindsa
Owned by	MS Lead D/Supt Walton & Intel
Work outstanding	
RAG status	

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<b>1.13 Include MS in CSP/SOCLP agendas</b>	
Task	Ensure that modern slavery is included within the local CSP/SOCLP agenda.
Method	<ul style="list-style-type: none"> <li>• Develop partnership arrangements</li> <li>• Sustain and improve partnership working in support of vulnerable people</li> </ul>
Actioned by	Partnership officers
Owned by	MS Bronze DCI Simpson
Work outstanding	<p>Elements of the data requests for National NPCC lead and WMP problem profile will be shared with CSPs/ SOCLPs to encourage debate and allow the MS to feature within CSPs/SOCLPs where there is significant activity of either victim living accommodation or exploitation through forced labour</p> <p>Through the PVVP board influence LA's to ensure MS is addressed in their own internal delivery plans and meeting agendas</p>
RAG status	

<b>1.14 Missing-trafficked persons</b>	
Task	Consider the vulnerability of mispers who may have been trafficked who are now archived.
Method	Review of COMPACT system to identify these and add markers.
Actioned by	PS Damien Forrest
Owned by	MS Lead D/Supt Walton DCI Young
Work outstanding	To be determined pending the outcome of a review by PC Bashir (LOCATE) regarding archived MISPERs who have MSHT indicators.
RAG status	

<b>1.15 Embed NRM process</b>	
Task	Strengthen victim/witness cooperation
Method	Ensure officers maximise safeguarding support available by deploying NRM process appropriately.
Actioned by	MS Coordinator Khizra Dhindsa
Owned by	DCI Sally Simpson
Work outstanding	<p>Whilst the NRM is in use, the identification at the front line of PVOT is not robust and further training will be required through 2017</p> <p>An episode of the upcoming video box series for frontline officers details when and how to invoke the NRM process.</p> <p>This deliverable aims to achieve Recommendation 6 of the October 2017 HMIC report on MSHT, which requires forces to immediately comply with the NRM process and with the duty to notify.</p>
RAG status	

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<b>1.16 Criming NRM data</b>	
Task	Ensure WMP is compliant with HOOCR & expectations around NRM.
Method	Improve understanding of the signs of Modern Slavery & embed the NRM/crime recording process within WMP
Actioned by	DCI Simpson
Owned by	CI Ryan Howat CST
Work outstanding	This deliverable seeks to achieve Recommendation 7 of the October 2017 HMIC report on MSHT, which requires forces to immediately ensure compliance with the NCRS in relation to MSHT and to provide an audit capacity to verify this compliance. Through operation Sentinel, NCALT, and other learning and communication opportunities raise awareness of the signs of MS and criming standards with all WMP staff. Through operation Sentinel, NCALT, and other learning and communication opportunities raise awareness of the signs of MS and criming standards with all WMP staff.
RAG status	

<b>1.17 Structured debriefs</b>	
Task	Forces to conduct structured debriefs after each MS operation.
Method	SOBAD (national template) debriefs to take place following executive action and also after prosecutions. Learning to inform national picture and also to be distilled into this plan and used to inform future operations.
Actioned by	SIO of every individual MS operation
Owned by	MS Coordinator Khizra Dhindsa
Progress	SOBAD debriefs have taken place for Operations Robotic and Bin.
Work outstanding	Learning is to be distilled back into this Plan. This is a Recommendation of the WMPCU QTA (October 2017).
RAG status	

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## Objective 2:

### **PURSUE: Prosecuting and disrupting Modern Slavery and Human Trafficking**

The National Modern Slavery Strategy aims to:

- Utilise strong organisations and effective collaboration.
- Develop and utilise new and existing capabilities.
- Attack criminal finances.
- Ensure that effective legal powers are available.
- Internationally, improve our own capabilities and cooperation with international partners.

The Force Serious and Organised Crime Strategy tactical objectives are to:

- Develop an effective covert and overt law enforcement response to prioritised criminal groups and lone offenders.
- Maximise opportunities to bring offenders to justice.
- Ensure a strong relationship exists between internal departments, law enforcement agencies and other partners to co-ordinate our Pursue activity.
- Ensure effective post incident investigation into offences committed by criminal groups or lone offenders.
- Ensure robust procedures are in place to ensure WMP fulfil sensitive and non-sensitive disclosure responsibilities under Article 6 of the Human Rights Act 1998 and the Criminal Procedure Investigation Act 1996.



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Force MSHT deliverables are:

2.1 Targeting MS OCGs	
Task	Pro active targeting of modern slavery OCGs (through force tasking processes.)
Method	<ul style="list-style-type: none"> <li>• Develop investigative and disruption activity</li> <li>• Target asset recovery</li> <li>• Develop specialist support in regions</li> </ul>
Actioned by	FCID DI Mattinson
Owned by	MS Lead DSupt Walton & FCID & ECU/RART & Intel Esther Martin
Work outstanding	<p>Intelligence currently reviews on-going MS operations to provide update to the National Operations Coordination Group meeting bi weekly.</p> <p>Consider merit of bi weekly/monthly operational update meeting to maintain force wide oversight of on-going MS operations and investigations - DSupt Walton**(can this just happen at MS Ops Group?)</p> <p>Increase OCG MS nominations for mapping via force OGGM SPOCs. This will help balance the OCG matrix in line with true national priority thematic areas and be less weighted via an unknown threat.</p> <p>This is a Recommendation of the WMPROCU QTA (October 2017)</p>
RAG status	

2.2 Enable Community Intelligence	
Task	Encourage community reporting of MS offenders
Method	Media campaign on Op Sentinel Modern Slavery strand Crimestoppers leafleting campaign and inputs to community groups/CSPs/NHWs
Actioned by	Corp Comms
Owned by	DCI Simpson
Work outstanding	MS comms plan required - DCI Simpson to take forward
RAG status	

2.3 Publicise asset recovery	
Task	Show reality of MS offending to communities and potential perpetrators.
Method	Publicise asset recovery from MSHT offenders to increase public confidence/ deter criminality
Actioned by	Amy Haycock
Owned by	Corp comms
Work outstanding	Operations currently in investigative phase - this will be explored once enforcement phase reached
RAG status	

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2.4 MS criminality - standards	
Task	Ensure appropriate approach to MS criminality
Method	Review the WMP approach to dealing with MS reactively and proactively
Actioned by	DI Mattinson DI Martin
Owned by	D/Supt Walton DCI Simpson
Work outstanding	Consider merit of bi weekly/monthly operational update meeting to maintain force wide oversight of on-going MS operations and investigations - DSupt Walton (** following on from general Ops Group?**)
RAG status	

2.5 CPS partnership	
Task	Establish clear practice with CPS
Method	Work with CPS modern slavery lead to establish best practice and remove obstacles to successful prosecutions
Actioned by	MS Coordinator Khizra Dhindsa
Owned by	DCI Sally Simpson
Progress	CPS MS lead Debbie Gould has featured in the WMP MS training videos for frontline officers
Work outstanding	CPS are currently updating their MS CPS local delivery plan which will be shared with WMP once completed Current on-going operations are subject to CPS consultation through investigative phase
RAG status	

2.6 ECU and SARS	
Task	Make best use of ECU and SARS to support enforcement, case build and develop enquiries
Method	Share ECU capabilities to support investigations. Make better use of SAR intelligence Use finances earlier in investigations to identify further areas for enforcement Recover greater assets from criminal conspiracies and OCG's
Actioned by	DI Postins
Owned by	DCI Walsh
Progress	A working group chaired by DCI Mattinson has established a process in relation to incoming SARs. They are now converted into intelligence reports and directed to the appropriate department to action.
Work outstanding	Auditing of SARs required in 2018 to ensure they are being recorded and actioned as expected Review (December 2017) the use of SARs data in order to instigate or progress MS investigations. Further, it is a Recommendation of the WMPROCU QTA (October 2017) to review SARs data collaboratively with DWP in order to identify opportunities for enforcement activity.
RAG status	

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<b>2.7 Work collaboratively with GLAA</b>	
Task	Engage in joint operations and investigations with GLAA
Method	Joint agency working to address labour exploitation
Actioned by	MS Coordinator Khizra Dhindsa
Owned by	Detective Supt Nick Walton
Work outstanding	GLAA are embedded in the MSIS and BP&P panels
RAG status	

<b>2.8 Maximise CMPG capability</b>	
Task	Utilise CMPG capability to disrupt MSHT activity.
Method	Provide MSHT- linked vehicle details to CMPG PC Jason Roberts.
Actioned by	All front line officers
Owned by	MS Coordinator Khizra Dhindsa
Work outstanding	This task emerges from a Recommendation of the WMPROCU QTA (October 2017).
RAG status	

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## Objective 3:

### **PREVENT: Prevent people from engaging or re-engaging in Modern Slavery and Human Trafficking crime**

The National Modern Slavery Strategy aims to:

- Improve our evidence base on modern slavery offenders.
- Deter people from engaging in modern slavery through raising awareness of the reality and the consequences.
- Prevent the facilitation of modern slavery.
- Use interventions to stop people being drawn into modern slavery crime.
- Utilise both the established offender management framework and new bespoke tools to deter reoffending.

The Force Serious and Organised Crime Strategy tactical objectives are to:

- Work with partners to develop our understanding of individuals vulnerable to recruitment into serious and organised crime.
- Develop a strategy and range of tactics to identify and divert vulnerable individuals away from activity that could lead to recruitment into serious and organised crime.
- Develop techniques to deter people from continuing in serious and organised criminality.
- Ensure effective offender management procedures are in place to break the offending cycle of prolific or persistent offenders to prevent an escalation of their intent and capability.
- Support the rehabilitation of offenders post release from prison to prevent a return to criminality.
- Ensure effective management of threats to life arising from serious and organised criminality.
- Ensure Pursue and Protect activity also maximises Prevent opportunities.
- Continue to develop our ending gang and youth violence programme.



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Force MSHT deliverables are:

3.1 Central point of contact	
Task	Develop infrastructure to support the strategy
Method	Provide a central point of contact for referral/advice for Police and partners, to signpost victims and information between agencies.
Actioned by	MS Coordinator Khizra Dhindsa
Owned by	MS Lead D/Supt Walton
Work outstanding	Use tactical returns to maintain force wide oversight of on-going MS operations and investigations - DSupt Walton. MS NPU SPOCs x 2 for each NPU to receive the 4 day MS Tactical Advisor training when it is delivered in house (possibly summer 2018) to enhance geographic resilience in force.
RAG status	

3.2 Build Community Resilience	
Task	<ul style="list-style-type: none"> <li>Enhance service offering in the community</li> <li>Encourage our communities to come forward and work with WMP</li> </ul>
Method	Neighbourhood Teams to provide information to community groups regarding modern slavery issues and 'signs' that persons may be victims. KIV harder to reach communities such as Eastern European, African, Vietnamese
Actioned by	NHTs and Corp Comms
Owned by	MS Bronze DCI Simpson & Corporate Comms
Work outstanding	<ul style="list-style-type: none"> <li>A bid is under construction for the PCC's office, in order to create an External Engagement Officer role, to lead on community and partnership engagement activity.</li> <li>The Liberate Plan will need to be EQIA assessed by trained assessors in order to establish what impact our actions are likely to have on minority communities. This is also a Recommendation of the WMPROCU QTA (October 2017).</li> </ul>
RAG status	

3.3 Prevent victimisation	
Task	Increase organisational understanding of 'vulnerability', including that of victims who appear to be offenders, and take action. The recognition of those low-level offenders who are victims of criminal exploitation is a Recommendation of the WMPROCU QTA (October 2017).
Method	Seek opportunities to negate victimisation and prevent those vulnerable to MS becoming victims
Actioned by	NPU MS Leads All officers dealing or supervising MS investigations
Owned by	D/Supt Walton
Work outstanding	Training will be provided to over 100 magistrates at Tally Ho on 2nd November 2018, to help them recognise and address modern slavery MS NPU SPOCs to scan communities to identify potential vulnerable groups Use Intervention and Prevention Board as opportunity to discuss and raise awareness of prevention of victimisation. This deliverable seeks to comply with Recommendation 5 of the October 2017 HMIC report on MSHT, which requires forces to ensure that all victims carrying out criminal acts under compulsion attributable to slavery or exploitation are afforded the protection of the S.45 defence.
RAG status	

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3.4 Partnering with business communities	
Task	Encourage our communities to come forward (S) Develop a Media campaign on Op Sentinel Modern Slavery Strand
Method	Increase awareness within business communities of risk posed by those committing offences of slavery and therefore increase intelligence, reducing opportunities for offenders to commit offences Particular reference to banks as key motivator is financial.
Actioned by	Business Crime Lead
Owned by	DSupt Walton, DCI Simpson
Work outstanding	Working with the lead for business crime, opportunities to be sought to raise awareness within business communities of threat posed by traffickers <ul style="list-style-type: none"> <li>MS and CSE posters should be rolled out to fuel services other than those on the motorways. Also to post offices, bus and coach depots. This is a recommendation from the WMPROCU QTA (October 2017).</li> <li>Seek a large West-Midlands based company to offer employment to past MSHT victims (possible candidate is 2 Sisters Food Group based at Snowhill, Birmingham). This is a recommendation from the WMPROCU QTA (October 2017).</li> </ul>
RAG status	

3.5 Improve partnership awareness/joint action	
Task	Increase awareness of MS with strategic and voluntary partners. On 18th October 2017, a WMASN event took place at Tally Ho, which was attended by over 50 local businesses. The focus of the event was 'Supply Chain Slavery' and delegates pledged to prevent and address MSHT issues in their own organisations.
Method	Encourage our communities to come forward Ensure new legislation and policy is understood
Actioned by	MS Coordinator and MS SPOCs
Owned by	D/Supt Walton, DCI Simpson
Work outstanding	Particular work is required to further engage critical partner DWP on this agenda and improve joint working
RAG status	

3.6 STO Recording	
Task	Ensure STO information is accessible and retrievable.
Method	Create a storage system/ place for STO information. Task drawn from a recommendation from the WMPROCU QTA (October 2017).
Actioned by	DCI Sally Simpson
Owned by	D/Supt Nick Walton
Work outstanding	This will also assist in delivery against Recommendation 9 of the October 2017 HMIC report on MSHT, which requires forces to ensure that opportunities to restrict the activities of those deemed to pose a clear threat to others in respect of MSHT offences are exploited. Awareness of the existence and usefulness of STPOs and STROs needs to be promulgated across the force
RAG status	

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## Objective 4:

### **PROTECT: Protect individuals, businesses and communities against Modern Slavery and Human Trafficking**

The National Modern Slavery Strategy aims to:

- Protect people at risk of becoming victims.
- Strengthen security and improve our ability to detect victims and traffickers at the border.
- Improve awareness of the signs of modern slavery amongst members of the public.
- Improve both public sector and private sector awareness and resilience.

The Force Serious and Organised Crime Strategy tactical objectives are to:

- Work with partners to develop our understanding of businesses that are vulnerable to exploitation by criminal groups or businesses that willingly support criminal activity.
- Develop a strategy and range of tactics to stop such activity.
- Work with partners to minimise opportunities for organised crime groups to exploit business to legitimise the proceeds of crime.

# Liberate: The Plan

Force MSHT deliverables are:

4.1 Action MS intelligence	
Task	Prioritise community intelligence for modern slavery, to feature at local and Force tasking / TRM
Method	<ul style="list-style-type: none"> <li>• Develop target hardening</li> <li>• Increase organisational understanding of vulnerability/threat/risk and take appropriate action</li> </ul>
Actioned by	Intel
Owned by	MS Lead D/Supt Walton
Work outstanding	WMASN intelligence task and finish group requires refresh and firm TOR to ensure it delivers outcomes MS is standing agenda item at NPU LTDB's however the rich intelligence picture required by NPUs is still in development.
RAG status	

4.2 Support organised immigration crime prevention	
Task	Reduce demand through supporting organised immigration crime work.
Method	Organised immigration crime creates or results in much of our MSHT demand. Working with immigration enforcement to identify removable offences early and remove risk from the UK will reduce this demand.
Actioned by	FNOs and NPU SPOCs
Owned by	D/Supt Walton
Work outstanding	Intelligence analyst Naqvi is meeting with Chief IO Thomson in November 2017 to discuss intelligence sharing and early joint intervention.
RAG status	

4.3 PVOT safeguarding	
Task	Ensure PVOT are protected
Method	We will ensure that PVOT are safeguarded whether identified within WM region or housed within the WM region Ensure the link between CSE and trafficking is recognised and understood
Actioned by	WMASN
Owned by	DCI Simpson
Work outstanding	There is a requirement to understand what PVOTs are identified within WM and those who are housed within WM having been identified in another region. This requires both a local and national coordinated approach to tracking victims to ensure the required support can be provided. Consideration to be given to CMOG/MARAC style multi agency coordination for PVOT To be raised at PVVP and WMASN
RAG status	

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4.4 Child PVOTs	
Task	Ensure child PVOTs are recognised
Method	We will ensure that child PVOTs are recognised as trafficking victims and therefore given the protection appropriate to any trafficking victim
Actioned by	PPU MS SPOC DI Martin Barnardo's
Owned by	D/Supt Walton D/Supt Drover DCI Simpson
Work outstanding	Use successful cases (such as recent convictions in CV) as opportunity to publicise benefits of MS legislation NW to work with JG and Kay Wallace/ Phillipa Cresswell to gain clarity around CSE and other slavery types.
RAG status	

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## **Reviews**

Deliverables will be reviewed monthly and updated following results of tasks at the Ops Group meeting. The overall plan will be reviewed annually by 1st April.

## **Governance and Accountability**

Individual and departmental responsibilities are listed for each deliverable.

Responsibility for maintenance of this document rests with the force MSHT coordinator.

The overall governance of this plan and accountability for its delivery rests with the Force Operational lead for MSHT crime.

## **Useful Contacts**

Some useful contacts who may be able to assist in achieving the deliverables in this plan include:

### **ACPO Criminal Records Office (ACRO)**

Overseas convictions • [intel@acro.pnn.police.uk](mailto:intel@acro.pnn.police.uk)

### **Business, Energy Industrial Strategy (BEIS)**

Companies, bankrupt, disqualified directors  
[mark.stephens@bis.gsi.gov.uk](mailto:mark.stephens@bis.gsi.gov.uk)

### **Driver Vehicle Standards Agency (ex VOSA & DSA) (DVSA)**

Haulage vehicles, MOT centres  
[trevor.watts@vosa.gsi.gov.uk](mailto:trevor.watts@vosa.gsi.gov.uk) (SPoC)  
[nicholas.wust@vosa.gsi.gov.uk](mailto:nicholas.wust@vosa.gsi.gov.uk)

### **Environment Agency (EA)**

Waste industry  
[national\\_intelligence@environment-agency.gsi.gov.uk](mailto:national_intelligence@environment-agency.gsi.gov.uk)  
[bernadette.cook@environment-agency.gsi.gov.uk](mailto:bernadette.cook@environment-agency.gsi.gov.uk) (SPoC)  
01217129323 / 07901331950

### **UK Border Force (UKBF)**

Customs controls, people & goods  
[Intel.BHX@homeoffice.gsi.gov.uk](mailto:Intel.BHX@homeoffice.gsi.gov.uk) (Bham Airport)

### **Action Fraud (NFIB)**

Fraud reporting gateway, online, cyber, banking +  
[NFIB-KnowFraud-Check@cityoflondon.pnn.police.uk](mailto:NFIB-KnowFraud-Check@cityoflondon.pnn.police.uk)

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## **National Crime Agency (NCA)**

Drugs, Firearms, CSE, MS/HT, Fraud

*regionaloperations.westmids@nca.pnn.police.uk (ROCU embed)*

## **Passport Office (HMPO)**

Passport application fraud, Illegal documents

*POLICE4.referral@hmpo.gsi.gov.uk*

Below are core agencies however are not currently being sent referrals unless specific intelligence relates to their area of business

## **Gambling Commission (GC)**

Gambling

*intelligencereports@gamblingcommission.gov.uk.cjasm.net*

*rbradford@gamblingcommission.gov.uk.cjasm.net (Intel Mgr)*

## **Financial Conduct Authority (FCA)**

(exFSA Accountants, Financial regulation)

*intelligence.team@fca.gsi.gov.uk*

## **Insolvency Service (IS)**

Disqualified Directors, Bankruptcy

*intelligence.team@insolvency.gsi.gov.uk*

*Sabrina.Sandhu@insolvency.gsi.gov.uk (SPoC)*

## **Royal Society Prevention Cruelty Animals (RSPCA)**

Animal welfare

*intelligence.manager@rspca.cjasm.net*

Below are core agencies however will not currently accept referrals – direct enquiries required where criminality suspected in areas of business

## **Driver & Vehicle Licensing Authority (DVLA)**

Driving licences, vehicle registration

*(via Force PNC Bureau)*

## **Her Majesty's Revenue & Customs (HMRC)**

Tax, importation of goods. (Red Diesel, Illicit Alcohol & Cigarettes)

*jaz.grewal@hmrc.gsi.gov.uk (ROCU embed)*

*07710636281*

*intelligence.bureau@hmrc.gsi.gov.uk*



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**Dept Work & Pensions (Job Centre Plus) (DWP)**

Benefits system

*shoreham.nduaddressandother@dwp.gsi.gov.uk (DPA)*

*DAWN.MEES@DWP.GSI.GOV.UK (SPoC)*

**Public Health England (PHE / NHS)**

GP patient, A&E hospital data

*nbo-t4@nhs.net (DPA)*