

A MODERN RESPONSE TO MODERN SLAVERY

April 2015



THE CENTRE FOR
SOCIAL
JUSTICE

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(In some quotes, "Trafficking in Human Beings" (THB) is referred to. The CSJ and UK Government uses the term "modern slavery". To maintain the integrity of quotes used throughout this report, THB is often used as it originates from the face-to-face interviews with Europeans carried out for the report and not the author.)

About the Centre for Social Justice

The Centre for Social Justice (CSJ) aims to put social justice at the heart of British politics. Our policy development is rooted in the wisdom of those working to tackle Britain's deepest social problems and the experience of those whose lives have been affected by poverty. Our Working Groups are non-partisan, comprising prominent academics, practitioners and policy makers who have expertise in the relevant fields. We consult nationally and internationally, especially with charities and social enterprises, who are the champions of the welfare society.

In addition to policy development, the CSJ has built an alliance of poverty fighting organisations that reverse social breakdown and transform communities. We believe that the surest way the Government can reverse social breakdown and poverty is to enable such individuals, communities and voluntary groups to help themselves.

The CSJ was founded by Iain Duncan Smith in 2004, as the fulfilment of a promise made to Janice Dobbie, whose son had recently died from a drug overdose just after he was released from prison.

Director: Christian Guy

A Modern Response to Modern Slavery

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I would like to thank everyone who took the time to speak to me during the course of this research. It has been a deeply reassuring process because each and every one of the interviewees – without fear of their name being published – provided a candid and clear account of the challenges law enforcement and governments face in stopping the modern slavery crime that exists in our society today. Keeping the issue alive on behalf of the many victims who have been discovered and those who remain hidden is of great importance to the CSJ. I am pleased to report that this is a passion shared by a number of the European police interviewed.

Rob Wainwright, I believe, has made Europol sharper and more impressive than ever before. He is enormously open minded to change and new ways of working. He made this research possible as a consequence. Rob was generous enough to open up his network within the European law enforcement community, and for that I will forever be in his debt. I must also say a huge thank you to Ben Waites, Rob's Chief-of-Staff. He was very patient with a very impatient researcher. A big thank you must go to everyone at Europol who helped out with fact-checking and providing guidance throughout.

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Finally, a big thank you to the wider CSJ team who have been supportive in so many ways.

Fiona Cunningham

Director's preface

As a new UK Government took office in 2010, few people would have predicted that one of its most important achievements would be a Modern Slavery Act. Slavery wasn't a political priority – it was barely understood in Westminster. Thanks to the passionate and determined work of many, including our team at the Centre for Social Justice and the author of this report, Fiona Cunningham, it has been elevated in our national and political consciousness.

The Modern Slavery Act, which gained Royal Assent in the final week of the last Parliament, shows us what can be achieved through the democratic process in our country, if leaders commit to governing with moral purpose. I am so proud that the CSJ's *It Happens Here* report sparked much of this progress and, with many others involved in making it happen, I thank Theresa May for her leadership on this as Home Secretary.

Yet those seeking an end to modern slavery know this marks only the beginning of what is required. It is now time to look beyond UK borders, especially to our European neighbours, in order to capitalise on the anti-slavery momentum which has built. For as this new landmark CSJ report shows powerfully, our continent is a hunting ground for criminal gangs intent on abusing, exploiting and destroying the most vulnerable citizens. Slavery thrives in too many European nations – sometimes in the shadows, sometimes in plain sight. Within and across its borders people are bought and sold – in many cases taken from poverty to even greater poverty. This cannot stand.

I was delighted that Fiona Cunningham agreed to join the Centre for Social Justice last year to lead a Europe-wide investigation and to write this vital new paper. I want to thank her for her leadership – both at the Home Office in delivering the Modern Slavery Bill and at the CSJ for this latest work. I also want to thank all who have given their time to helping Fiona produce such a high quality report – they are named in her acknowledgements. Across the UK and Europe we have encountered people willing to volunteer their time to be part of the change we need. The CSJ, and much more importantly those trapped in modern slavery across Europe, are in their debt for doing so.

Much of what the investigation has uncovered will shock readers and attract considerable attention. But, important as this analysis is in seeking to understand the issues, this report is primarily about creating change. Its most important feature is the set of 40 recommendations

to those who have the power to make a difference. As people focus on Europe-wide issues such as the Union, free movement and immigration, stability in the Eurozone and widespread youth unemployment, we also call on them to ensure action is taken to end the injustice and failure we reveal in these pages. As we show here, these issues are so often interlinked.

We commit at the CSJ to help to make change happen. All over our continent others need to do the same. Slavery is not inevitable and leaders have the power to end it. This report lights the path they must take to do so.



Christian Guy
Director

Foreword

Rt Hon Theresa May MP

When 15 year old Serena's¹ parents arranged for her to marry a man in the UK, she agreed. She left her home in Gambia, and thought she was heading towards a better life. But as soon as she arrived it became clear things were not as they had seemed. Raped by the man who was supposed to be her husband, she was locked away in a room with no heating, no light and little food. She was then forced into appalling and brutal sex with groups of men and women. Sometimes she would be taken for a drive... to secluded buildings where she and other young girls would be raped and made to pose for sexually explicit photographs.

Serena's story is shocking. Her suffering is unimaginable and some might think this is an isolated crime. But the truth is crimes such as this are being replicated in towns and cities across Europe. Men, women and children are being duped, tricked and lured, and then exploited and abused for profit through various means from forced labour to prostitution. And behind many of the victims we see, are organised crime groups and their networks making money from human misery.

Only a few years ago, many people would have found it difficult to believe that slavery was taking place in the UK and Europe. But thanks to the energy, commitment and insight of organisations such as the Centre for Social Justice we are now seeing these crimes for what they truly are. And this report is right to call on all of us in Europe to term them by their proper name: modern slavery.

In the UK we have introduced a Modern Slavery Act. This will ensure that we can go after traffickers and slave drivers more effectively, and protect and support victims. But legislation is only part of the answer. We need concerted and co-ordinated action by law enforcement agencies and other partners and we, as a society, need to confront the shocking reality of modern day slavery.

As this report makes clear, organised crime lies behind much of the modern day slave trade, and it is enabled by modern technology, and modern means of travel. We need to understand much more about these organised crime groups, their business models, their involvement in and the interplay between various overlapping crime types.

¹ Not her real name

This report helps us do that. It highlights the many complexities involved in modern slavery, and the work that needs to be done to prevent and prosecute these crimes. Most importantly of all, it makes clear that this is a cross-border crime that needs law enforcement in different countries to work together to disrupt and defeat these organised crime groups.

In 2013 the Centre for Social Justice published its seminal report *It Happens Here* and laid bare the horrors of modern slavery in the UK. This report builds on that and makes a strong and clear case for what needs to happen next.

Today we can no longer say slavery doesn't exist in our societies. We can no longer shut our eyes, turn our backs, or look the other way. Slavery has not been banished to the past, but is here today and in our midst.

I want to thank Fiona Cunningham for all her work in the fight against modern slavery, and commend her for this tremendous report. It is through such passionate and determined belief in justice and human dignity, that we will put a stop to these crimes, and ensure that the victims of modern day slavery can go free.



Rt Hon Theresa May MP
The Home Secretary

Foreword

Rob Wainwright

This report is particularly timely, coinciding with the passage into UK law of the Modern Slavery Act, a landmark piece of legislation championed by the Home Secretary which may inspire lawmakers in other European countries. It is fitting that the report should open with words from the Home Secretary and from a representative of the European law enforcement community, firstly because it combines legislative, policy and policing perspectives, and secondly because it compares the UK situation to what is happening elsewhere in Europe.

Following on from the Centre for Social Justice's *It Happens Here* (2013), a report which focused on modern slavery in the UK, this new report takes a broader view, looking beyond the phenomenon of modern slavery itself and exploring how it should be tackled in every country in Europe. Reflecting the multi-faceted nature of modern slavery and human trafficking, the report draws on the expertise of various sectors: think tanks, NGOs, central government and of course law enforcement.

I am the first to acknowledge that an effective response to this type of crime relies on law enforcement agencies working closely with a wide range of actors, and I am pleased to note that this view is increasingly shared by police chiefs across the continent. This report takes a practical approach to the issues involved and is not afraid of challenging received wisdom, including outdated ways of working within my sector. As such it offers a fresh perspective, complementing existing governmental, academic and NGO research in this field.

My own experience of tackling human trafficking dates back over a decade, to a time when the term "modern slavery" had not entered our vocabulary. Indeed, I recall a frankly lacklustre response to my earliest efforts to establish a coherent anti-trafficking strategy at European level. Great progress has been made in the intervening years, with growing recognition of the scale and nature of this crime and the terrible harm it causes. Based on Europol's assessments of serious organised crime threats across the EU, Justice and Home Affairs (JHA) Ministers have recognised trafficking in human beings as a major crime-fighting priority since 2011. With this ministerial backing, Europol provides the platform for national law enforcement agencies to step up their efforts to close intelligence gaps, respond to new criminal modus operandi, develop new tactics and make more consistent use of the tools already available.

As this report highlights, as long as human trafficking goes unreported, it cannot be tackled. From a law enforcement perspective, the most pressing challenges are for frontline officers to recognise human trafficking and modern slavery where they occur, and to know how to handle such cases, including referral to the relevant specialised authorities. It is then incumbent on these experts to recognise the cross-border dimension of so many cases and to make use of Europol and other established mechanisms to investigate and prosecute cases with the full force of the law – often the law of two or more countries.

For those of us who have been working in this sector for some time, it is perhaps too easy to point to the steady progress that has been made. This report is a wake-up call: looking objectively at the current situation, a huge amount remains to be done and there is no room for complacency if we are to put organised traffickers behind bars and free victims from a life of slavery.



Rob Wainwright
Director-General, Europol

Executive summary

The UK has passed a Modern Slavery Act, the first of its kind in Europe but hopefully not the last. With the UK becoming a hostile environment for slave traders, it is possible that criminals will move their victims to a country without a Modern Slavery Act. To stop innocent men, women and children being forced into unimaginable situations, often malnourished and kept in squalor, every country in Europe needs to play its part. The same applies to the rest of the world; making one country or continent tougher on traffickers just moves the problem to a less hostile jurisdiction.

This report has found that a huge amount of modern slavery in Europe is driven by Organised Crime Groups (OCGs) who profit from the exploitation of vulnerable people. These highly sophisticated illegal businesses show a detailed understanding of how to avoid detection and prosecution by Europe's law enforcement agencies. The kind of modern slavery that is driven by OCGs involves men, women and children being moved across international and national borders through various means of transportation and deception. Criminals will exploit victims in the most profitable of ways and by the easiest of means.

Exploiting the internet and borders made less defined due to European Union policies like Free Movement, OCGs find the trafficking of victims to be a highly lucrative and accessible crime to pursue. As such, they have become highly sophisticated in developing illegal business models.

When slavery was prevalent over two hundred years ago, there was no internet. Nor were many slave traders able to purchase low-cost international travel. So slavery as we know it today is modern. It thrives on modern technology and modern forms of travel. Trafficking a victim for exploitation, robbing that individual of their liberty and exerting violence and controlling through fear is slavery; just as cruel and unacceptable as it was all those years ago.

Slavery is also illegal in the modern world and as such, it is for law enforcement to prosecute any criminal involved in the slave trade.

One of the first recommendations of this report is to harmonise terminology across Europe and the world. **The rest of Europe should in the future refer to this form of crime as what it is: modern slavery.** Many of the European police interviewed for this report agreed. They commented that using the term modern slavery made raising public awareness of the issue much easier and drove home the severity of the problem.

Of equal importance is obtaining reliable data from which meaningful policy and resource decisions can be made. There is a lack of data and statistics. It is currently impossible to say how many victims of modern slavery exist in any one country. The UK has developed a new methodology to reach a more reliable estimate, but to solve the problem academics, think tanks, governments and law enforcement across Europe need to concentrate on how to develop good quality data.

Modern slavery thrives on extreme poverty and disadvantage which is why the Centre for Social Justice will continue to campaign to keep it a high profile issue. Making modern slavery a thing of the past will require a fight against organised crime, but we must also fight the poverty that makes a man, woman or child vulnerable to exploitation in the first instance.

This report looks at how policy makers and law enforcement across the European Union could develop a more modern response to modern slavery.

Chapter One: Organised crime and modern slavery

A modern response to Organised Crime Groups

Just as any FTSE 100 company has a supply chain and sophisticated business model, the same is true of many OCGs.

And just as any OCG utilises its networks to commit modern slavery crime, law enforcement and governments must use their own networks to close down and disrupt OCGs.

This report looks at how law enforcement could develop a wider understanding of the core DNA of an OCG. The intelligence picture of the OCGs involved in modern slavery around Europe is incomplete. Prosecutions for modern slavery cases remain stubbornly low. This report aims to demonstrate how these could be improved.

There are pockets of excellent and impressive work carried out by police across Europe. Looking at such examples of good practice allows this report to make recommendations for law enforcement to replicate and build upon them.

Organised crime in immigration could reveal hidden victims

As the movement of people across Europe has significantly increased over the years, law enforcement agencies and governments are struggling to respond to the new opportunities for organised crime that this has opened up.

This report has heard that OCGs operating across borders are leveraging aspects of the immigration system for profit by exploiting innocent victims who they move across land, sea and air borders for enslavement.

Experts have told the CSJ that the challenge for law enforcement in some forms of immigration crime is in judging the difference between an accomplice and a victim. Currently,

that judgment errs on the side of accomplice and investigating immigration crime is largely left to immigration and borders agencies whose main aim is to deport. As a consequence, victims are hidden and OCGs can operate without much risk. They make huge profits from using EU citizens to legalise the stay of irregular migrants.

Free Movement has made it even tougher to spot victims of modern slavery from the EU as they arrive in destination countries legally. This means EU citizens do not come to the attention of either police or immigration and borders agencies, unless an additional or more obvious crime is committed.

OCGs are taking advantage of families living in poverty and persuading them to allow their children and relatives to travel abroad for work and a better life, only for them to be exploited by organised criminals. This exploitation takes many forms: we have heard how girls are being sold into sham marriages and how men and women are being trapped in forced labour.

Sham marriages: a European case study (from a source country)

*'Women tend to be aged between 15 and 25 years old. When they leave my country they often end up in the UK where they are forced into sexual exploitation, labour exploitation, benefit fraud and they are sometimes sold to Asian males for sham marriages. This is one group. The other that we see often are people who cannot find a job in my country. So people will try to find a job on websites and receive offers to come and work in the farms in the UK. These people are mainly men who are then exploited for labour. At first, they are brought to London and they don't really stay in London now. Now they tend to be in the North part of England like Bradford, Sheffield and Leeds. There are also lots in Manchester, Birmingham and Gretna in Scotland so they can be married no matter what the age.'*²

Cyber slavery

'Often when you look further into a case that is on the surface it is a matter of three men exploiting six girls you can realise that there is actually a business model behind it. If you stop investigating when you have prosecuted the three men you will only be dealing with the tip of the iceberg. This is not always the case but it is a crucial component of most investigations. The internet offers the opportunity for trafficking to be an organised crime. There are trafficking rings where girls are moved from Brussels to Athens to London. They are advertised on sites and moved around Europe with the pimp organising the website. Sometimes the girls are so well controlled the pimp doesn't even need to travel with them in order to make them do what he wants. This makes it even more difficult to investigate as if the crime is taking place in various countries, who will investigate the case?'

European Police Chief in evidence to the CSJ at Europol, September 2014

The internet presents a huge opportunity to criminals and we have heard how OCGs are highly technologically aware. In this chapter we look at software solutions and opportunities for law enforcement to crack down on OCGs' online activities.

² Off-the-record interview with European Police Liaison Officer working out of an Embassy, November 2014 (recorded and transcribed for analysis).

Modern slavery victims are being duped or advertised online and the growing speed with which OCGs are using cyber techniques should be of great concern to law enforcement and governments all over the world.

The proliferation of OCGs operating trafficking and modern slavery networks online is such that this report will refer to it as **cyber slavery**. This report argues that cyber slavery combines elements of cyber crime and of cyber-enabled crime, thus making it distinct from both.

Cyber slavery targets victims in four ways:

- **Recruitment** – victims are duped by job advertisements.
 - OCGs lure victims for sexual exploitation through adverts for child care, cleaning and administrative jobs.
 - Victims recruited for forced labour are targeted through adverts for jobs in agriculture, construction, the transportation sector and delivering charity bags.
- **Transportation** – trafficking victims internally or internationally.
 - Criminals use stolen credit cards to purchase travel so that neither the tickets nor the victims can be easily linked back to the traffickers.
- **Control** – keeping victims trapped and in fear with little hope of escape.
 - Close surveillance of the victim by imposing a system of daily email exchanges and chat sessions to prove their presence.
 - Victims monitored using live cameras.
 - Victims blackmailed.
 - Clients blackmailed.
- **Exploitation** – victims used as a never ending revenue stream through exploitation.
 - Victims repeatedly sold for sex and often moved across borders.
 - Victims forced to work for free or little money.

Modern slavery cartels

We have heard that the sophistication of some OCGs operating networks of modern slavery has matured into the kind of business model used by drug cartels. In its most basic form, a 'cartel' is defined as:

*'An agreement or association between two or more business houses for regulating output, fixing prices, etc; also, the businesses thus combined; a trust or syndicate.'*³

Two examples of successful law enforcement operations which led to prosecutions are put forward to show how in addition to being organised and incorporating new technologies to outwit law enforcement, there is evidence of cartelistic practice being used to increase the trade in human life.

- **Operation Burgave** (Sweden, April, 2013) investigated two Romanian OCGs who were working out of more than one European country. They routinely sold girls between them for sexual exploitation, often from the touch of a button on a laptop from a bar

3 Oxford English Dictionary, 3.c [accessed via: <http://findwords.info/term/cartel> (20.04.15)]

somewhere in Romania. Aside from selling victims to each other, they also had a deal: one would operate brothels in Northern Ireland for two weeks while the other operated brothels in Sweden for the same time period before switching it round. It allowed them to avoid law enforcement for a time. It also meant they were regulating output in each place.

- **Operation Bexhill** (UK, September, 2014) demonstrated how highly sophisticated OCGs running modern slavery rings can be. One of the members was working for a big four accountancy firm, while the top man owned a luxury apartment in Canary Wharf and three properties in New Dehli. Money was laundered to India in the region of £151,000. The women who were pimped out by them were expected to sometimes have sex as frequently as 20 times a day, including without a condom. Over 40 mobile phones and numerous computers were found at a property referred to as the 'nerve centre'. Summing up Judge Peter Gower QC described the exploitation enterprise as a '*highly sophisticated business*'.

An integrated response to the organised crime behind modern slavery

Organised crime is at the heart of nearly all forms of modern slavery (domestic servitude being the exception) and organised crime appears in immigration. It is the job of law enforcement to fight crime and to keep up with agile OCGs. They can't fight modern slavery alone, but they could:

- investigate more cases of immigration crime with the intention of finding modern slavery victims;
- join up with relevant operational partners, like borders agencies, more often to share intelligence and data or jointly investigate cases; and
- tax and customs officials and police could work more closely on modern slavery cases with a focus on money laundering and the movement of criminal money from the proceeds of exploitation.

Chapter One Recommendations

1. 'Modern slavery' should be used as a term across Europe, replacing 'Trafficking in Human Beings' (THB).
2. National governments must hold law enforcement, borders and immigration officials to account for ensuring that the relevant actors are sufficiently aware and trained to identify modern slavery when it is happening, as well as the organised crime behind it.
3. Law enforcement should pursue more proactive investigations into modern slavery crime, working with immigration and border staff in exchanging information, data and intelligence to create a more complete picture of the way in which an Organised Crime Group is operating and in how many crime types and countries.
4. Law enforcement in the EU should make an assessment of which Organised Crime Groups display cartelistic practices.
5. National governments in the EU should call upon respective law enforcement to review the Organised Crime Groups operating within their respective countries to determine which ones are involved in modern slavery, assessing their international connections.

6. All European national governments should bring forward a Modern Slavery Act to pull all trafficking offences into a single piece of legislation. It should include a maximum life sentence for convicted traffickers which heightens the risk and deterrent for Organised Crime Groups, a clause to protect victims from prosecution and create an Anti-Slavery Commissioner.
7. Regulators of the legal and accountancy professions in European countries should introduce a specific system to strike off any lawyer or accountant found to be involved in legitimising any Organised Crime Group involved in modern slavery and publicise the fact to raise industry awareness of modern slavery crime and the organised crime behind it within their own profession.
8. The European Commission should take steps to maximise awareness of the European Communities Against Trafficking toolkit across relevant agencies Europe-wide, and maximise its adoption.
9. National governments in the EU should recognise 'cyber slavery' as a distinct crime, separate from 'cyber crime' and 'cyber-enabled crime', to facilitate a tailored response and determine adequate resource.
10. Cyber slavery and modern slavery, as part of the national threat from organised crime, should be included in future Strategic Defence and Security Reviews in the UK.

Chapter Two: Source, transit and destination countries

In developing policies and strategies, there is a need for clarity in tackling modern slavery. In an attempt to achieve this, we have broken down the OCG supply chain by source, transit and destination countries.

Source countries

The sad fact is that for some victims of modern slavery, the exploitation they suffer is preferable to life in their home country. Victims find themselves at the mercy of traffickers because they are highly vulnerable and desperate for a better life.

It is in the European interest to understand, and tackle, what makes an individual vulnerable to modern slavery in source countries. Ultimately, more disruption at the source reduces the exploitation, and crime, experienced in transit and destination countries.

The European Commission should review all its trafficking projects with the aim of improving work and education programmes in source countries where they exist and look to develop more where they do not.

Profile of a trafficker

*'There is no standard profile of traffickers. They range from truck drivers and village 'aunties' to labour brokers and police officers. Traffickers are as varied as the circumstances of their victims.'*⁴

4 Feingold, David A, 'Human Trafficking', Foreign Policy, 150, 2005, ProQuest Social Science Journals, pp26–32 [accessed via: www.bayswan.org/traffick/Hum_Trafficking_Feingold.pdf (01.04.15)]

OCGs exploiting children from source countries

- Minors are typically trafficked from families in difficult socio-economic circumstances. Traffickers use complicit money lenders to push these families further into debt, with high interest rates effectively forcing families into debt bondage.⁵
- Children are easily recruited and sometimes sold by the families themselves. More shockingly, OCGs trafficking children for forced begging specifically target orphans or children with disabilities because of the higher incomes brought in from begging.⁶
- **Operation Lakeland**, a joint operation between police in Slovakia and Kent including Children's Social Services, Health Education, the National Crime Agency, West Yorkshire and Kent Police is an example of the enslavement of children facilitated by OCGs for the purposes of sexual exploitation. This operation was also supported by police in the Czech Republic. The operation involved child victims largely from Slovakia who were trafficked within the UK.

There was evidence that these children were being kept for periods of time under the influence of drugs and alcohol, which makes it incredibly easy to control them. The Operation included police from Slovakia working in the UK with Kent Police. The CSJ was told that having Slovak officers on the case improved the cooperation of the suspects because of the removal of the language/cultural barrier. In one day, 22 suspects were arrested, 12 of whom were Slovakian. On the same day, 16 children were taken into protection and were not sent back to their families as it was seen as dangerous due to the significant risk of being exposed to harm.

- Identifying trafficked children is even more difficult than identifying adults. Disappointingly, these children are often treated as offenders.
- Pregnant women are sometimes recruited and forced to sell their babies. **For trafficked children between the ages of 6 months and 10 years, OCGs can pay between EUR 4,000 and EUR 8,000.**⁷
- **In some cases children have been sold for the purpose of exploitation for up to EUR 40,000.**⁸
- In a number of cases illegally adopted children are trafficked for exploitation.⁹

A jointed-up approach across the EU to help source countries

Police Liaison Officers from source countries are based at Europol and in Embassies across the EU. They are critical in linking source country intelligence with police in destination countries seeking to identify victims and investigate OCGs. Greater use could be made of them in informing good policy decisions by destination country governments. They are well placed to identify policy gaps or the impact of policy and legislative changes in a destination country.

5 Europol, Intelligence notification 16/2014, *Child trafficking for exploitation in forced criminal activities and forced begging*, October 2014 [accessed via: www.europol.europa.eu/content/child-trafficking-exploitation-forced-criminal-activities-and-forced-begging (19.03.15)]

6 Ibid

7 Ibid

8 Ibid

9 Ibid

Policy development needs to be evidence based. Eurostat will need to continue to push for better data from member states to help make their findings much more robust than is currently the case.

European countries are working in silos without adequately targeting the issue at source as a collective.

In being more joined-up across the EU, one way should be through public awareness campaigns. They are vital in targeting communities within source countries. Victims often come from small communities in rural parts of their country. Producing awareness campaigns to target rural communities, along with running international campaigns, will better inform potential victims, communities and the public making it harder for OCGs to lure and dupe the vulnerable, but this needs to be linked up to anti-poverty programmes focusing on education and work.

Case in point: source country OCG exploiting destination country national welfare systems

A Slovakian OCG duped families into travelling to the UK by coach. Once across the border, the OCG took all their documents and forced the victims into domestic servitude, labour exploitation and benefit fraud.

In relation to benefit fraud, the OCG used the families to fraudulently claim benefits which were then taken for profit by the criminals. Members of the OCG took victims to open bank accounts, using a “translator” who was in fact an OCG operative. Curiously, 99 per cent were opened with a major high street bank – Slovakian Police have no explanation for this. The money made by the OCG from trafficking victims for this kind of exploitation yielded enough profit to build houses in Slovakia which are nicknamed ‘smarties’ because the houses are painted brightly and in different colours.

Legislation has been shown to be effective in preventing such abuses of the benefits system. For example, the OCG that had been trafficking families into the UK to fraudulently collect benefits on their behalf have now redirected their operation. Organised criminals are responsive to policy and legislative change, and redirect their operations swiftly and accordingly. In this instance, and as a result of the UK 2014 Immigration Act, the OCG began trafficking families to Canada, where they would be made to claim asylum because Canadian law permits benefits to be paid to asylum seekers for up to six months whilst their case is considered.

Transit countries

Transit countries and the argument for EU Passenger Name Records

Little attention has been given to how we stop OCGs in transit. It is difficult for police: victims may not realise they are being trafficked at this stage, and criminals exploit Free Movement and the Schengen zone. The increasingly borderless nature of all crime types demands that we prioritise such issues.

An obvious way of improving our response to OCGs transiting victims is **Passenger Name Records (PNR)**.

EU PNR would give police real-time airline data on the movement of OCGs and traffickers. PNR consist of non-sensitive data provided by passengers to airline companies, such as: details of who purchased the ticket, and how; travel destination; and size of the group.

Legislative change to provide EU PNR has been delayed by the European Parliament. This is a significant blow in the fight against modern slavery. Following the terror attacks in Paris, the European Parliament has restarted negotiations which they hope to conclude by the end of 2015:

- modern slavery and other forms of organised crime need to be included in the scope of EU PNR: at the moment, this is uncertain as MEPs argue over whether anything other than counter-terrorism should be included in the scope;
- we already share PNR information with countries outside Europe, such as the US, so we should be able to share it within the EU;
- Free Movement policy requires safeguards to mitigate unintended consequences like modern slavery. EU PNR is one safeguard; and
- police interviewed for this report said Free Movement has made trafficking across EU borders easier; with the possible result of increasing the number of victims.

Destination countries: where exploitation begins and profit is made

OCGs target destination countries based on opportunity, profitability, ease at the border, diaspora links and level of risk. This report looks at how a hostile environment might be created to disrupt criminal networks in destination countries.

*'OCGs involved in trafficking in human beings service well established illegal and sex markets in Member States and especially in destination countries in Central and Western Europe. These markets generate huge profits for the OCGs involved, which are laundered, transferred and invested in source, transit and destination countries. The constant demand for services associated with sexual and labour exploitation and persistent socio-economic inequalities between the developed and developing world drive human trafficking.'*¹⁰

Creating risk and a hostile environment for OCGs

Modern slavery is a complex crime. It is this complexity that serves as a camouflage for crime groups, allowing them to operate with impunity and with little fear of being pursued. It is an organised crime and should be policed with the same tools used to target other forms of organised crime, for example drug trafficking.

Across the EU, law enforcement are setting up specialist units to police modern slavery crime. This is a welcome improvement which will provide much needed focus. Training within law enforcement at all levels is vital to victim identification and increasing the number of proactive investigations.

¹⁰ Europol, EU Serious and Organised Crime Threat Assessment, 2013, 2.3, p24 [accessed via: www.europol.europa.eu/content/eu-serious-and-organised-crime-threat-assessment-socta (01.04.15)]

Collecting statistics and data in destination countries

There are serious problems in recording, collating and analysing reliable and comparative data and statistics across Europe to accurately scale the issue and inform resource decisions.

In the UK, we can examine referrals to the **National Referral Mechanism** (NRM) for numbers of victims – although this is not perfect. Not all countries in Europe have a NRM. Moreover, member states are not providing sufficient data and statistics for study and comparison to Eurostat (the body in Europe responsible for producing statistical analysis on modern slavery).

The Chief Scientific Adviser at the Home Office recently calculated a UK figure of between 10,000–13,000 victims of modern slavery in one year.¹¹ He has shared his methodology with this report (see Chapter Two).

Building our response to labour exploitation in destination countries

Overall, more is known about sexual exploitation than labour exploitation in destination countries. Traditionally, academics and NGOs have viewed trafficking through the prism of sex exploitation, resulting in a lack of focus on labour exploitation.

There is a need for more academic research into labour exploitation and maritime modern slavery.

In the UK, the **Gangmasters Licensing Authority** (GLA) is involved in operations around labour exploitation (they say 70 per cent of cases they examine involve organised crime).¹² However, the name ‘Gangmasters Licensing Authority’ is confusing to people; it should be renamed the Labour Exploitation Unit. It should be given additional funding to expand its remit.

Chapter Two Recommendations

Source countries

11. National governments in the EU should have an organised crime and modern slavery impact assessment for every new policy/policy change relating to crime, policing and immigration policy.
12. Law enforcement leaders should introduce a single protocol document to be completed by any officer dealing with a modern slavery case that is accessible by other police forces and Europol in order to increase intelligence sharing.
13. National governments should seek to bring together operational actors with policy makers in pursuit of policy with impact. This will have the positive effect of creating policy which is easily accessible and translatable by those implementing it.

11 Professor Bernard Silverman, Chief Statistician, Home Office, December 2014. See HM Government, *Modern Slavery Strategy*, London: Her Majesty's Stationery Office, 2014, p17 [accessed via: www.gov.uk/government/uploads/system/uploads/attachment_data/file/383764/Modern_Slavery_Strategy_FINAL_DEC2015.pdf (01.04.15)]

12 Provided privately to the CSJ by the Gangmasters Licensing Authority

14. The number of Police Liaison Officers should be increased and they should have better links with national governments in the countries where they are based.
15. The EU Commission should review all its trafficking projects to evaluate outcomes.

Transit countries

16. The European Commission, Parliament and Council of Ministers need to urgently agree the scope of EU PNR to include modern slavery and other forms of organised crime.
17. Budget airlines flying from source countries to destination countries should partner with national governments for public awareness campaigns and the exchange of information about subjects of interest.
18. EU countries with a particular emphasis on those in the Schengen Area, as part of their strategy to combat modern slavery, should closely monitor the coach sector. A condition of issuing licences to coach companies should be that they prove they have measures in place to stop traffickers in transit. One of those conditions should be video cameras on coaches. Law enforcement should then spot check to ensure the cameras are running.
19. Interpol and Europol should set up a “modern slavery crime best practice” hub for European law enforcement to regularly share innovative anti-slavery techniques which have evidence of success.

Destination countries

20. There should be a yearly focus by G6 members specifically discussing the issue of modern slavery crime.
21. Law enforcement should annually report the number of Joint Investigation Teams signed with other countries to respective Interior Ministries. National governments and policy makers should maintain a proactive awareness of every Joint Investigation Team currently relevant to their country.
22. In the UK, trafficking offences should be included in Recorded Crime Statistics.
23. There should be Europe-wide awareness campaigns funded by the European Commission and in conjunction with national governments. They should focus on websites and advertising that may be luring people into modern slavery. The campaign should be aimed at victims when applying for jobs or responding to any advertisements, but should also be aimed at consumers to educate them to question what might be behind their purchases.
24. Each force should have a Victim Recorded Interview (VRI) officer or, if this is not feasible a VRI Specific Point of Contact (SPOC) for the unit dealing with trafficking. National governments should encourage them to build on the research from Cambridge University (included in this report).
25. In the UK, the Gangmasters Licensing Authority should change its name to the Labour Exploitation Unit to avoid confusion about its role. It should have its remit expanded and be given a cash boost to pay for evidence gathering on the extent of labour exploitation.
26. National governments in the EU should review which bodies are responsible for investigating labour exploitation to assess if they are equipped and trained in modern slavery crime and organised crime more generally.

Chapter Three: Prosecution rates

Prosecution rates for trafficking offences remain too low across Europe. When asked why, one European Police Chief who gave evidence to the CSJ said:

*'I think it is about attitudes within the police. If the police in my country were able to invest as much financial and human resources into THB as into drug trafficking for example, the system would work better. I do not believe it is more complicated than that.'*¹³

In 2012 Eurojust published a report having asked national governments what is underlying the small number of THB investigations and prosecutions at national level.¹⁴ Ranked by level of seriousness they were as follows:

1. evidentiary difficulties in modern slavery cases;
2. issues around the identification of modern slavery cases and victims;
3. complexity of it being a cross border crime and the multilateral nature of it;
4. general lack of knowledge and experience in modern slavery cases; and
5. the recovery of criminal assets.

This chapter looks at how some of these hurdles can be overcome.

Overcoming hurdles

This section focuses on testimony evidence from victims and looks at how we can help victims through the criminal justice system so that we can increase prosecution rates with better evidence in court. It also looks at the need for more multilateral working between EU law enforcement to overcome cross border hurdles while gathering and sharing more intelligence.

We can help victims of modern slavery by:

- thinking through police interviews with victims more carefully. This report includes work from Cambridge Ph.D. student Pascale Reinke-Schreiber who has researched the best way to get good testimony while looking after a victim. She asserts that victims of modern slavery display harms unique to this crime;
- improving partnerships between law enforcement and Non-Governmental Organisations (NGOs). In Switzerland it was reported that improved cooperation between the two resulted in more victim testimony;
- law enforcement in appropriating resource will favour investigations with the hope of prosecution, so improving victim testimony will encourage more proactive police work on modern slavery cases; and
- closer cooperation with law enforcement and NGOs helps victims overcome their fear of authorities. NGOs should be involved throughout the entire investigation to help victims feel relaxed and more trusting.

¹³ Off-the-record interview with European Police Chief, conducted at Europol, The Hague, September 2014 (recorded and transcribed for analysis)

¹⁴ Eurojust, *Strategic Project on Eurojust's action against trafficking in human beings*, October 2012, p8 [accessed via: www.eurojust.europa.eu/doclibrary/Eurojust-framework/Casework/Eurojust%20action%20against%20trafficking%20in%20human%20beings%20%28October%202012%29/THB-report-2012-10-18-EN.pdf (24.03.15)]

OCGs work out of more than one country. They also often work out of more than two countries. It is logical to assume that to disrupt and prosecute criminals more frequently, multilateral working is beneficial. However, currently, police tend to be more inclined to bilateral working and often intelligence is lost when some bilateral investigations end because the arrangement between two countries was informal.

Consequently we need to encourage law enforcement to work more multilaterally during investigations. There has been a decline in multilateral working, reported by Eurojust, between 2012 and 2013 and this is a wasted opportunity.¹⁵

Police interviewed for this report explained that multilateral investigations are good because, to quote one, *'they [police] cannot be everywhere'*. They also said that law enforcement must *'convince public bodies across Europe that it is in their interests to share data around and compare intelligence'*.

Joint Investigation Teams (JITs)

In addition, we have heard that more multilateral Joint Investigation Teams (JITs) would also lead to more prosecutions.

Once law enforcement demonstrates the benefits of a partnership between more than one country, and that there is a serious, complex or organised crime issue, a JIT can be signed off.

There are considerable benefits of a JIT in modern slavery investigations including overcoming cross-jurisdiction issues:

- trusting relationship and co-ordinated effort;
- immediate exchange of evidence and intelligence;
- the ability to use otherwise non-evidential material;
- availability of international resources;
- reduced bureaucracy;
- better **identification of victims**;
- potential funding;
- jurisdiction of prosecution variable;
- targeting an entire OCG, not just one small section in one country or region; and
- increased opportunities for asset seizure.

However, JITs for modern slavery cases appear to be underused. Of the 3,109 JIT cases registered at Eurojust (2004–2013) modern slavery cases totalled a mere 144, representing just 4.6 per cent of all cases.¹⁶

¹⁵ Eurojust, *Implementation of the Eurojust Action Plan against THB 2012–2016, Mid-term report*, November 2014, p11 [accessed via: http://eurojust.europa.eu/doclibrary/Eurojust-framework/Casework/Implementation%20of%20the%20Eurojust%20Action%20Plan%20against%20THB%202012-2016%20-%20Mid-term%20report%20%28November%202014%29/THB-mid-term-report-2015-02-05_EN.pdf (01.04.15)]

¹⁶ *Ibid*, p9

Intelligence sharing

*'I would say there is a lack of cooperation with other countries that can be an obstruction to investigating THB cases. There should be a global data sharing project on the issue as getting data from other countries is very time consuming. There is not enough time to investigate all cases fully and do proactive investigations. We need more human resources rather than financial resources.'*¹⁷

European Police Chief in evidence to the CSJ at Europol, September 2014

As part of the research, European law enforcement agencies were asked how data and intelligence sharing could be improved. Speed and trust were recurring themes.

In terms of gathering intelligence, evidence and data for analysis, there is an international tool available to police. It is known as SIENA:

- **Secure Information Exchange Network Application** (SIENA) is Europol's intelligence gathering mechanism connecting all law enforcement agencies to Europol and to each other;
- it receives intelligence from national police and it provides intelligence and analysis of intelligence in return through a secure network;
- law enforcement in Europe is not routinely exploiting it as frequently for modern slavery cases compared to other forms of organised crime.

In 2014, out of all 34,472 cases initiated in SIENA, just 1,591 were for modern slavery cases.¹⁸

Chapter Three Recommendations

27. Law enforcement should be drawing on the same techniques used in other aspects of organised crime when investigating modern slavery cases.
28. There should be a dedicated list of police officers and a single point of contact within every European police force available for all who investigate modern slavery to facilitate swift handling of intelligence.
29. Interpol needs to become more involved with law enforcement in the fight against modern slavery. They need to provide more intelligence analysis to help police better track Organised Crime Groups.
30. Member states should diligently provide data on modern slavery required by EUROSTAT and be named-and-shamed when they don't.
31. National governments should roll out more witness protection programmes across Europe to mitigate the problem of victims being too scared to give evidence.

¹⁷ Off-the-record interview with European Police Chief, conducted at Europol, The Hague, September 2014 (recorded and transcribed for analysis).

¹⁸ Data provided privately to the CSJ by Europol

32. As part of bringing forward a Modern Slavery Act, countries of the EU should establish an Anti-Slavery Commissioner, with 28 Anti-Slavery Commissioners meeting annually to share best practice, information and data. The Commissioners would then take on responsibility for holding law enforcement and government to account. They could also have responsibility for:
33. Training courses for investigators and prosecutors in interviewing victims of modern slavery. This will ensure that authorities get more reliable victim testimony, helping towards more prosecutions. It will have the added benefit of providing law enforcement with more evidence and intelligence for future investigations.
34. National governments should publish victim interview guidance literature for law enforcement.
35. Non-Governmental Organisations should be present when a victim first comes into contact with law enforcement, and continue to be so through to prosecution. This will ensure that victims who are suspicious of authorities feel supported by an independent organisation.
36. There should be an accreditation system for Non-Governmental Organisations to demonstrate that they meet certain criteria for victim case work and cooperation with European law enforcement. This would build trust to facilitate information sharing between police and Non-Governmental Organisations. It is also right that victims have access to the best standard of care.
37. European law enforcement and Non-Governmental Organisations should establish a formal working framework. Roles should be clearly defined within the framework. One way of achieving this could be through a Memorandum of Understanding (MoU).
38. European law enforcement should consider a multilateral investigation in the first instance, unless there are only two countries relevant to that investigation.
39. Secure Information Exchange Network Application should be set up and used at all levels of law enforcement to include regional and local police. This will encourage police, by its proximity, to add more information into the system, improving the quality of intelligence and information that comes out.
40. There must be a concerted effort to raise awareness of Joint Investigation Teams amongst European law enforcement in order to increase international cooperation and the number of multilateral investigations, leading to an increase in prosecution rates, closing the intelligence gap and encouraging more police to work (at ease) with international counterparts – making European law enforcement a more joined-up community.

Methodology

The scope of this report focuses on the 28 member states of the European Union.

The findings draw together primary research conducted over 2014, and a review of the limited reports and data already available on the subject of modern slavery.

Gathering the evidence

Full literature review: Review of all major reports and statistics surrounding the issues of modern slavery and organised crime. Most papers concede that reliability of research and data available in the area of modern slavery is very limited.

Paper survey sent to the 28 EU member states. Response rate: 13 out of 28 countries.

Interviews:

- 22 countries, 14 of which were face-to-face, recorded and transcribed for analysis. Each interview followed the same set of questions, and averaged one hour long.
- Two European prosecutors.
- Eight NGOs from the same countries as law enforcement interviewed; this was to test and compare their perspective on how their relationship works.

Observation of a five hour debrief police interview with a victim of trafficking who had become a controller.

Evidence gathering meetings with experts from Europol and Eurojust.

Conference attendance: Santa Marta Group Conference in London and the Forced Labour Conference in Ireland (Newry) 2014.

Analysis of court evidence and Europol Intelligence Notifications.

Numerous off-the-record interviews with UK police who have experience of working on modern slavery cases.

Introduction

Modern slavery across EU countries

Children sold for EUR 40,000 then trafficked across the European Union for exploitation which takes many forms: sex, begging and petty crime. Eastern European girls trafficked around Europe for prostitution or forced to marry men looking to regularise their immigration status. Vast sums of criminal money profited from modern slavery moved from one country to another with sometimes little idea of what it is paying for at the other end. Families trafficked to the UK from Eastern Europe for benefit fraud resulting in houses being built in Slovakia from the proceeds of modern slavery crime, unwittingly paid for by the UK tax payer. An explosion of advertisements on the internet designed to lure and dupe vulnerable people living in poverty to another country for a life lived in modern slavery.

This is the world of modern slavery and at its heart is organised crime.

Organised Crime Groups (OCGs) are agile and clever. They travel and move victims all over Europe using cheap travel, paid for by credit cards purchased illegally on the dark web to hide their identity and evade the law. While victims live in squalor and fear, OCGs enjoy lavish lifestyles made possible by large sums of money generated from repeatedly exploiting the vulnerable with little risk of facing prosecution for their crimes.

Modern slavery is a complex crime made so by its cross-border reach and associated legal problems. Victims are seen as commodities by OCGs and treated as such. Those lucky enough to be discovered, sometimes far from home, are found in a state of trauma and fear which can make it hard to rely on the use of their testimonies in court to prosecute criminals.

Yet despite the extent and horror of this crime, prosecution rates for modern slavery cases are comparatively low. This report asks why this is and looks at how action can be taken to routinely disrupt OCGs, put more traffickers behind bars and offer justice to their victims.

We have heard how organised crime lies behind much of, but not all, illegal and facilitated illegal immigration crime and that modern slavery lies behind some of these cases. However, because those investigating organised crime tend to ignore cases that look like straightforward illegal immigration, so opportunities to identify more victims of modern slavery are being missed. Similarly, immigration officers investigating illegal immigration cases generally aim to

deport, meaning that they too are less likely to identify the victims of modern slavery driven by organised criminality.

The UK can be extremely proud of the Modern Slavery Act 2015, the first of its kind in Europe. Drawing on the Centre for Social Justice's ground breaking report, *It Happens Here* (2013), the Act introduces more police powers, increases the maximum sentence for modern slavery crime from 14 years to life imprisonment and, significantly for victims, reduces the possibility of prosecution for crimes they were forced to commit by their slave drivers. The Act is a major leap forward in the fight to increase prosecution rates and help free victims of modern slavery.

However, OCGs are responsive to policy and legislative change, and redirect their operations swiftly and accordingly. For example, one OCG network had been trafficking families into the UK to fraudulently collect benefits on their behalf. There was a recent change in UK law (Immigration Act, 2014) which prevents new migrants from claiming benefits for their first three months in the country. As a result, the OCG instead began trafficking families to Canada, where they would be made to claim asylum because Canadian law permits benefits to be paid to asylum seekers for up to six months whilst their case is considered.

Because the Modern Slavery Act will make it harder for OCGs to operate in the UK, it is reasonable to assume that OCGs will change tactics, quite possibly redirecting to other countries.

This report strongly recommends that other EU countries bring forward a Modern Slavery Act to make it harder for OCGs to simply move their exploitation elsewhere.

A modern response to modern slavery beyond legislation

In keeping up the pressure on OCGs, we also need to look beyond legislation and recognise it can only achieve so much if done in isolation. To increase prosecution rates and free more victims, the policy and operational response needs to be updated to compete against OCGs in the fight against modern slavery. This report considers how:

- to overcome cross-jurisdiction hurdles in prosecuting OCGs operating in more than one EU country;
- to improve data collection across the EU to provide national governments with a better evidence base for policy making resource planning;
- modern IT can help identify victims and their traffickers;
- we can update our knowledge of OCG 'business' models and how they operate;
- to encourage law enforcement to proactively investigate modern slavery cases more than is currently the case; and
- to raise awareness of modern slavery with potential victims, communities and within EU law enforcement at all levels, as well as other statutory bodies.

We argue that the overarching EU strategy should be to increase prosecution rates and release more victims from modern slavery. To deliver on that, a variety of tactics are required within source, transit and destination countries.

Awareness of modern slavery is gathering pace. Whilst this is good news for its victims, the hurdles in policing and prosecuting such a complex crime will take time to overcome. Law enforcement and national governments in the European Union have largely made a start. But we must try harder. We owe it to the men, women and children who are being so cruelly controlled by networks of organised criminals and forced to live a life that most of us could never imagine – for it is no life at all.

This report aims to shine a light on the complexity of modern slavery crime and the organised crime behind it. It also calls upon European law enforcement, national governments and policy makers to be more joined-up domestically and internationally. There is a need to be more creative and determined in making the business of modern slavery unprofitable for OCGs. Criminals of the sort that exist in the world of organised crime respect money over humanity. OCGs think they can play by their own rules. We must leave them in no doubt that they are wrong and as a society, exploiting the innocent for profit will no longer be tolerated.

chapter one

Organised crime and modern slavery

*'Oh, it is an organised crime absolutely. Rings that are conducting human trafficking tend to be linked into other crime groups. Sometimes THB [Trafficking in Human Beings] can look a lot like an immigration crime but when exploitation takes place it changes the nature of the behaviour and the crime.'*¹⁹

European Police Chief in evidence provided to the CSJ at Europol, September 2014

The CSJ has repeatedly heard that highly sophisticated Organised Crime Groups (OCGs) lie behind most instances of modern slavery. This chapter looks at how OCGs trade in people, manipulating and avoiding immigration systems, and examines why law enforcement are struggling to target their activities. We argue that a more effective response by European nations, building on the example of the UK's Modern Slavery Act, combined with a sharper focus by national law enforcement agencies and better international working, will help to reduce the opportunity OCGs have in Europe to keep people in modern slavery.

Immigration, OCGs and modern slavery

The movement of people across Europe has increased significantly over the years. Law enforcement agencies and governments are struggling to respond.

For police and borders agencies across Europe illegal immigration is a high priority. Yet OCGs operating across borders are leveraging aspects of immigration for profit and capitalising on domestic and international human poverty and disadvantage to traffic or facilitate movement of people across land, sea or air borders as a commodity. These groups are resourceful and competent, often well able to keep ahead of law enforcement and policy makers.

¹⁹ Off-the-record interview with European Police Chief, conducted at Europol, The Hague, September 2014 (recorded and transcribed for analysis)

The modern world of criminality, illegal immigration and even more so, facilitated illegal immigration, acutely demonstrates just how deft, agile and responsive organised criminals are to policy and legislative changes. It also demonstrates how OCGs quickly find one form of criminality to enable another. This report looks at how some victims of modern slavery are hidden within the organised crime which has enveloped parts of the immigration system.

Some OCGs exploit certain parts of the immigration system for profit. In the UK, for example, OCGs have been fixing English language tests to ensure visas for hopeful migrants.²⁰ The *EU Serious and Organised Crime Threat Assessment* (2013) sets out some of the tactics of crime groups in this area:

*'OCGs exploit legislative loopholes and are able to quickly identify, react to and even anticipate changes in legislation ... legal channels are abused for the facilitation of illegal immigration in order to gain entry into the EU and to legalise the stay of irregular migrants within the EU. Using tourist agencies, corrupted visa officers, and even shell companies, OCGs aid large numbers of irregular migrants in obtaining visas to overstay the validity period. They arrange marriages of convenience with Member State citizens on a large scale and provide assistance in abusing the asylum system to gain temporary legal stay.'*²¹

Other criminal groups, however, do more than outwit an overburdened immigration system. These groups are involved in a far more sinister industry. One in which people are robbed of their liberty, forced into the most horrible forms of exploitation and often kept in violent, malnourished and impoverished conditions, away from the glare of communities and without means of escape. Their criminal members are contemporary slave traders.

The extent of modern slavery and OCGs today

The International Labour Office (ILO) estimates that annual illegal profits of forced labour (including sexual exploitation) in the EU and Developed Economies amount to \$46.9 billion, with an estimated annual illegal profit per victim of \$34,800.²² Recovery of these profits is notably poor – for example in the UK only £2 million has been recovered from slave drivers and traffickers in the last four years.²³

More broadly, according to a recent estimate by the Organised Crime Portfolio (OCP), revenues from organised crime as a whole in the EU alone are worth a staggering €110 billion – equivalent to one per cent of EU gross domestic product.²⁴

20 This was exposed by BBC journalist, Richard Watson, in 2014. See BBC News, *Student visa system fraud exposed in BBC investigation*, 10 February 2014 [accessed via: www.bbc.co.uk/news/uk-26024375 (30.03.15)]

21 A shell company is a company which does not actually trade, and in this context may be used as a front for an illegal business. Europol, *EU Serious and Organised Crime Threat Assessment*, 2013, 1.9, page 16 [accessed via: www.europol.europa.eu/content/eu-serious-and-organised-crime-threat-assessment-socta (18.03.15)]

22 International Labour Office, *Profits and Poverty: The Economics of Forced Labour*, Geneva: ILO, 2014, pp13–14 [accessed via: www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_243391.pdf (24.03.15)]. In defining the term "forced labour", the ILO states that it 'includes practices such as slavery and those similar to slavery, debt bondage and serfdom as defined in other international instruments', adding that 'the ILO Committee of Experts on the Application of Conventions and Recommendations (CEACR) has provided guidance on the scope of the definition of forced labour, stressing that it encompasses trafficking in persons for the purpose of labour and sexual exploitation.' (pp3–4)

23 HM Government, *Modern Slavery Strategy*, London: Her Majesty's Stationery Office, 2014, p38 [accessed via: www.gov.uk/government/uploads/system/uploads/attachment_data/file/383764/Modern_Slavery_Strategy_FINAL_DEC2015.pdf (30.03.15)]

24 Financial Times, *Organised crime in EU worth at least €110bn a year, says study*, 31 March, 2015 [accessed via: <http://www.ft.com/cms/s/0/782f6944-b753-11e4-981d-00144feab7de.html?siteedition=uk#axzz3VoQDI0T2> (02.04.15)]

Case in point: profits and cost in the UK

In 2013, serious organised crime was estimated to cost the UK more than £24 billion a year.²⁵

In 2014, the social and economic costs of human trafficking for sexual exploitation – just one form of modern slavery – were estimated to be £890 million per year in the UK.²⁶ The estimated scale of this one crime type (that is, its value to criminals) is £130 million per year although this figure is cited as being conservative and therefore likely to be underestimated. The scale of organised people smuggling is estimated to be a further £88 million, again underestimated.²⁷

The connection between illegal migration and slavery is fundamental to the problems which are set out in this report. False documents, bogus colleges, and sham marriage ceremonies are often a means to a more sinister end. This is well illustrated by the case exposed by Operation Joust.

Operation Joust

Joust began in the North West of England in October 2013.

The starting point for this case was the discovery of a network of bogus colleges which appeared to be facilitating illegal immigration. As further investigation unfolded it showed that the bogus colleges were merely a small piece of a much bigger, more complex and highly sophisticated business model being run by an OCG. This operation allegedly included tax evasion, trafficking women for sham marriages, duping men into bogus colleges and moving huge sums of criminal money out of the UK and into Pakistan. The OCG propped up its business model with the help of – either wittingly or unwittingly – accountants and lawyers.

Like a FTSE 100 company, the OCG built its illegal business to be responsive to the customer. For example, in the case of the sham marriages, a 'rate card' was developed. The highest fee on the 'rate card' was aimed at men who wanted to stay in the country indefinitely. Price was also based on visa expiry dates – an imminent expiry commanded a higher price (as the customer needed it quicker).

The OCG network was comprised of a number of different divisions:

Sham marriages: Eastern European girls were trafficked into the UK by criminal gangs, who were part of a wider OCG network. They were primarily trafficked for the purpose of sexual exploitation and eventually sold into sham marriages. Some 'customers' bought brides for pregnancy allowing the father (customer) grounds to claim his Article 8 right to family life.

25 HM Government, *Serious and Organised Crime Strategy*, London: Her Majesty's Stationery Office, 2013, p5 [accessed via: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/248645/Serious_and_Organised_Crime_Strategy.pdf (11.03.15)]

26 Mills, H et al, *Understanding organised crime: estimating the scale and the social and economic costs (Research Report 73)*, London: Home Office, 2013, p10 [accessed via: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/246390/horr73.pdf (30.03.15)]

27 *Ibid*, pp10,14

Bogus colleges/facilitated illegal immigration: Pakistani men were duped and facilitated into the UK. They paid upwards of £4,000 to attend one of a number of bogus colleges. Documents were provided for travel and study. On arrival in the UK, the same documents were removed by the OCG. The would-be 'students' would never see their money again.

Criminal money moved out of the UK: The OCG allegedly sent up to £1 million a day in profit, made from victims, to Pakistan. HMRC are thought to be looking into the case.

Tax evasion: Many of the bogus colleges were not paying VAT and had been under quoting their corporation tax liability. It is alleged that one of the colleges was issued with a bill in the region of £1.5 million (VAT £900,000 and Corporation Tax £600,000).

Property empire: Allegedly, OCG members currently own 28 properties in the area. Some of the properties were rented to victims held in debt bondage. Investigators worked through the Government Agency Intelligence Network (GAIN) which is used to investigate organised crime. It is alleged that one property that had been converted into 13 flats had not paid for water, gas or electricity since 2011. After investigating the property, engineers from Electricity North West stated that the electric meter had been wired directly into the mains which could have been lethal for the occupiers. A bill for over £35,000 was issued.

Legal and accountancy services: It was alleged that JOST criminals had access to professional 'enablers', notably in the legal and accountancy professions, to facilitate their illegal business model.

Although elements of the OCG have been disrupted by the closure of some of their colleges, it is alleged that the same OCG network has moved part of its bogus college business to the Isle of Man.

As a consequence of Operation Joust, action has been taken against some people in the OCG network. However, those at the very top continue to look legitimate, living luxury lifestyles.

From a safeguarding perspective, the outstanding question is what has happened to the Eastern European girls who were forced to marry Asian men? Have they been married more than once? Are they still living with the men and if so are they being exploited in any way? These girls are victims of modern slavery who are essentially lost in a foreign country.

(It should be noted that we have been unable to publish everything that was reported to us on JOST during the research.)

The example of Operation Joust shows how complex and sophisticated OCG operations involving modern slavery are and how they are packaged up with a range of illegal activities. It also shows the different ways in which immigration issues run through modern slavery. In the case of the arranged 'sham marriages' this was trafficking pure and simple. However, in the case of the bogus colleges, what started as voluntary immigration ended in entrapment. It is these complexities that create the difficulties for law enforcement that we discuss in the next section.

Sham marriages: A European case study (from a source country)

*'Women tend to be aged between 15 and 25 years old. When they leave my country they often end up in the UK where they are forced into sexual exploitation, labour exploitation, benefit fraud and they are sometimes sold to Asian males for sham marriages. This is one group. The other that we see often are people who cannot find a job in my country. So people will try to find a job on websites and receive offers to come and work in the farms in the UK. These people are mainly men who are then exploited for labour. At first, they are brought to London and they don't really stay in London now. Now they tend to be in the North part of England like Bradford, Sheffield and Leeds. There are also lots in Manchester, Birmingham and Gretna in Scotland so they can be married no matter what the age.'*²⁸

New challenges: cyber slavery

A particular challenge for law enforcement and government is the use of cyberspace by OCGs. Increasingly rapid technological advance online is making it easier for traffickers to go about their business of exploitation for profit. Europol recently published an Intelligence Notification which was as clear as it was candid about the impact this is having on victims, the freedom it is providing OCGs and the difficulties for police catching criminals in cyberspace.²⁹

'Often when you look further into a case that is on the surface it is a matter of three men exploiting six girls you can realise that there is actually a business model behind it. If you stop investigating when you have prosecuted the three men you will only be dealing with the tip of the iceberg. This is not always the case but it is a crucial component of most investigations. The internet offers the opportunity for trafficking to be an organised crime. There are trafficking rings where girls are moved from Brussels to Athens to London. They are advertised on sites and moved around Europe with the pimp organising the website. Sometimes the girls are so well controlled the pimp doesn't even need to travel with them in order to make them do what he wants. This makes it even more difficult to investigate as if the crime is taking place in various countries, who will investigate the case?'

European Police Chief in evidence to the CSJ at Europol, The Hague, September 2014

Modern slavery victims are being duped and/or advertised online, and the growing speed with which OCGs use cyber techniques should be of grave concern to law enforcement and governments all over the world. We were told of one website alone which offers over 6,500 women per day for sexual services, including approximately 500 in each of two London boroughs. This is cyber slavery.

The internet facilitates modern slavery in four ways:

- recruitment;
- transportation;

28 Off-the-record interview with European Police Liaison Officer working out of an Embassy, November 2014 (recorded and transcribed for analysis)

29 Europol, Intelligence Notification 15/2014, *Trafficking in human beings and the internet*, October 2014 [accessed via: <https://www.europol.europa.eu/content/trafficking-human-beings-and-internet> (27.03.15)]

- control of victims; and
- exploitation.

Evidence from Europol shows that victims who end up in some form of labour exploitation are recruited through online advertisements promising jobs in, for example, agriculture, collecting and delivering charity bags, construction, the cleaning or transportation sectors. Adverts aimed at recruiting victims for sexual exploitation tend to offer work in cleaning, child care and administration.³⁰

This report argues that cyber slavery is distinctive from cybercrime and cyber-enabled crime because it takes the form of both: the internet is used to directly attack an individual and cyber slavery is enabled by the use of the internet or internet-enabled devices and applications.

The growing speed with which OCGs are using cyber techniques should be of great concern to law enforcement and governments all over the world. The proliferation of OCGs operating online is such that this report will refer to it as **cyber slavery**.

We must make a few distinctions so we can form a clear argument and demonstrate why cyber slavery is a meaningful term and how it compares to cybercrime and cyber-enabled crime.

Cybercrime

A direct attack on a device or a system, through a virus (malware) or what is known as a direct denial of service (DDOS) attack.

Cyber-enabled crime

Creates the space for a crime to be committed and facilitated by the internet, like credit card fraud or drug trafficking.

Cyber slavery

Can take the form of both cybercrime and cyber-enabled crime because the internet is used to attack an individual directly as well as being enabled by the use of the internet or internet-enabled devices and applications which facilitate, for example, communication between members of an OCG as well as the transfer of money gained from abuse of the individual. Cyber-enabled crime is funding cyber slavery because commercial online advertising is paid for by fraudulent payment data that is also acquired online.

Any number of new, creative, online tricks are being found by criminals in pursuit of profit by exploiting victims or potential victims. Perpetrators can remain anonymous through the use of TOR (The Onion Router) which reroutes and encrypts an individual's internet activities, or Virtual Private Network (VPN) which masks their location and the time at which any online post was made.³¹ Cyber slavery presents new and greater challenges than offline slavery. For

³⁰ Ibid

³¹ The Onion Router (TOR) protocol was developed by the US Navy and provides anonymous internet services for individuals and web servers by redirecting and encrypting internet traffic through a series of relay 'nodes', which are operated by individuals using the network, making user activities almost impossible to trace. The Virtual Private Network protocol is a standardised system for encrypting data sent between two computers or servers, which can also be used to mask a user's location when a connection is made to an external website.

a start, there is the scale and reach that the internet offers OCGs, which facilitates direct exploitation and creates an environment which allows criminals an advantage over law enforcement.

*'The online exploitation of victims provides various revenue streams to OCGs. In addition to payments from clients, OCGs also charge their victims for advertisement costs.'*³²

Europol

One senior police officer who contributed to this report made the argument that police need to investigate more online cases and policy makers need to focus more at the recruitment phase aided by websites. By better understanding the reach of cyber slavery and how OCGs use it, law enforcement could find more opportunities to trace organised criminals online.

'The other [pattern] that we see often are people who cannot find a job. The employment rate is not good. So people try to find a job on websites and receive offers to come and work in the farms in the UK. These people are mainly men who are then exploited for labour on these farms.'

European Police Officer, in evidence to the CSJ, at Europol, The Hague, September 2014

Cyber-enabled crime facilitates the transportation of victims. Traffickers purchase tickets online using fraudulent credit cards in order to hide identities. In doing so, neither the tickets nor the victims can be easily linked back to the exploiters, controllers and facilitators.

Worryingly, OCGs have cultivated a new cyber modus operandi:

'OCGs maintain close surveillance of their victims, by imposing daily email exchanges or chat sessions to prove their presence. Victims can also be monitored using live cameras, which are often justified as security measures for their safety.'

Europol

This new technique allows victims to be controlled and harboured more easily. Victims can never escape the glare of their trafficker or controller. Even the perception of this form of control has been witnessed in the UK; in a case before the courts at the time of writing, it was the belief of the victim that remote monitoring ensured that s/he remained captive for many years.

The internet is also being used by perpetrators as a vehicle to blackmail and control their victims. Traffickers threaten victims by telling them that pictures of them engaged in some kind of criminal or sexual act will be exposed online. Victims do not want to bring embarrassment and shame on their family, or indeed themselves, within their own community so will do what the controller wants to avoid such exposure. It is not just victims who are being blackmailed – clients (that is, the individuals paying for sex) are too:

³² Europol, Intelligence Notification 15/2014, *Trafficking in human beings and the internet*, October 2014 [accessed via: <https://www.europol.europa.eu/content/trafficking-human-beings-and-internet> (27.03.15)]

*'In many cases, clients make bookings and pay online directly to the organisers, making their contact details available to OCGs.'*³³

Europol

Cyber slavery allows OCGs to run networks of modern slavery largely freely and with very little in the way of traceable information about who they are and where they are based. They can disguise their identities by registering websites abroad or using pseudonyms.

'These people are travelling all the time. They are very organised and they know how the police work. So you know, they would never use the same cell phone more than once. Online dating has replaced streetwalkers and visible prostitution has kind of vanished and now it is through websites and social media. When you try to impersonate a customer to find them, most of the time they have left the country before you can find them.'

'You need to focus on the fact that this is modern slavery and obviously when you see the online profile of these escort girls you can normally tell where something is wrong. You do need to tell citizens that if they are going to see a prostitute there will be a bad guy involved in this. You have to make people aware and they need a good disincentive.'

European Police Officer in evidence to the CSJ, at Europol, The Hague, September 2014

During this research it was suggested that OCGs use the internet to expand their recruitment of victims internationally. Material used to target victims is often recycled to reach other countries after it has been established to work well in one country. Victims then find themselves in transit to other countries depending on where the client is based, although sometimes clients will visit victims. This makes it challenging for police to monitor or investigate. Organised criminals, through the internet, simply move from country to country safe in the knowledge that they are avoiding law enforcement. Often these people are leaving and re-entering the same countries multiple times. It should be possible for police to mitigate this issue by requesting an alert when a person of interest re-enters the country.

However, there are risks involved for the OCGs involved in cyber slavery. Because their activity can leave some trace it is increasingly seen as an opportunity for European police in targeting the online practice of modern slavery. But to be absolutely clear, this is a massive challenge for police in terms of the sheer entrepreneurial spirit of the criminals involved, and from a legal point of view. It is also the case that what is allowed in terms of police tools in one European country might not be permissible in another.

'In my country it is very easy for criminals to use technical devices that the police cannot track. In certain countries the police can get information through things like WhatsApp. This is really helpful but they can only see the message history. They can reconstruct how everything happened but they cannot work proactively with this advantage.'

European Police Officer in evidence to the CSJ, at Europol, The Hague, September 2014

33 Ibid

There is an added problem with companies such as WhatsApp: they are U.S.-based and particularly recalcitrant about helping law enforcement agencies in recovering material from phones.

As with other forms of organised crime on the internet, private sector companies, especially those in the social media and technology market, need to work more readily alongside law enforcement to disrupt criminals intent on using the internet to lure, dupe and enslave men, women and children. Such partnership is helpful in terms of raising awareness online, and running counter narrative work to reach and help victims before the criminals get a chance to exploit them. Strong partnership working with the private sector is also required for investigation and data sharing. This kind of partnership has worked in the past for other forms of organised crime or counter terrorism work. If we are to come down on the OCGs who are using the internet to facilitate modern slavery, these partnerships are absolutely vital. Well publicised private sector partnerships for other forms of crime have included child exploitation and counter terrorism partnerships with Facebook and Google, and three-way money laundering partnerships between law enforcement, government agencies and banks. For example, in one high profile case in 2014, Google revealed the identity of a Texan man, John Henry Skillern, after discovering child abuse imagery in his Google Mail (Gmail) account. Google alerted a child protection agency who then reported this to the Police, with the offender being duly arrested.³⁴

European governments need to start building cyber slavery into the policy work and strategies they develop in response to the steady growth of cyber criminality as a whole. Everyone must play their part: policy makers, law enforcement, social media companies, the wider private sector, and as one police officer told us, even the customer. The customer has to understand what lies behind some of the advertising and material they use online and this can be done by raising awareness through the internet. To enable this, the private sector needs to work alongside law enforcement and cooperate where asked.

Clearly, technology has an increasing role to play in the fight against the OCGs involved in modern slavery. These crime groups are highly technologically sophisticated and law enforcement must start matching this approach with innovative solutions of their own.

Investigating OCG activity on the dark web

The US Government, through its Defense Advanced Research Projects Agency (DARPA), has developed a search engine called Memex which can dig deep into the dark web. Memex tools allow investigators and analysts to identify indicators of human networks that may be engaged in activities related to cyber slavery. Memex tools do this by identifying, collecting, and organising publicly available online content and visualising how this content is shared across the web. Analysts can explore an area of interest, such as location, time period, or internet source and identify networks that may be active within that area. Memex tools

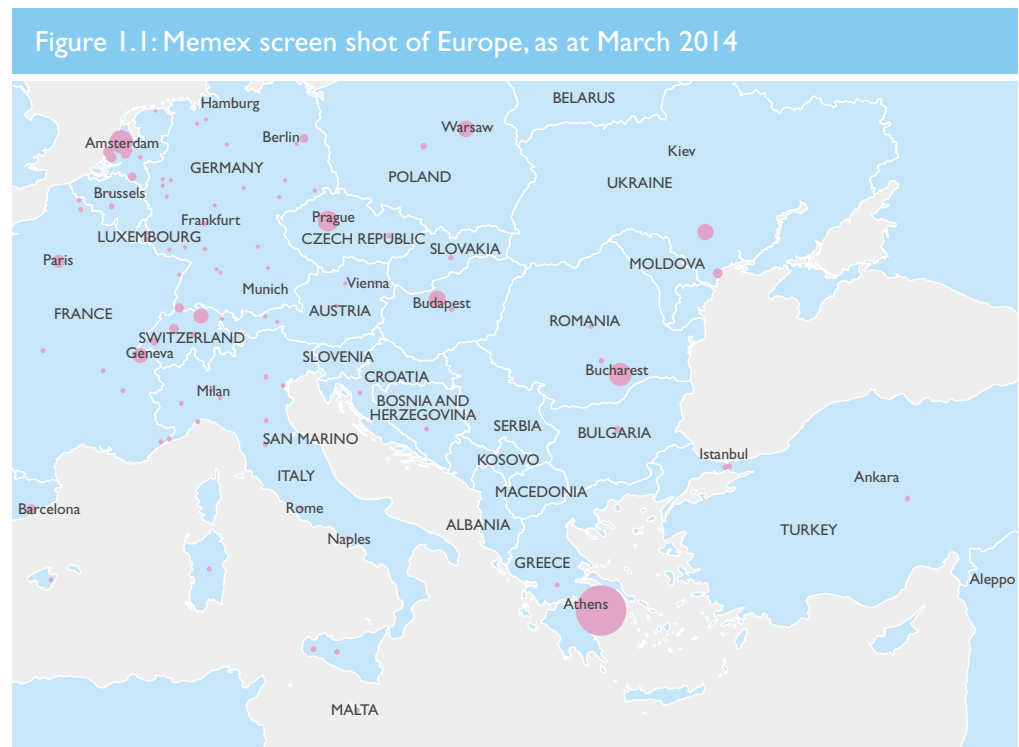
³⁴ BBC News, *Google 'reveals user' over Gmail child abuse images*, 4 August 2014 [accessed via: <http://www.bbc.co.uk/news/technology-28639628> (17.03.15)]

are designed to support analysts in network identification tasking by clearly identifying the indicators of human network behaviour. This allows analysts to make an informed assessment.

In New York in the past year, DARPA observed over 500,000 advertisements online for sex and related activities. As part of a pilot testing of Memex software, the District Attorney of New York has begun adopting the tools as part of their standard operating procedure for anti-trafficking cases. They have used the tools in convictions, indictments and opening new cases. They have sifted the 500,000 advertisements in order to support court cases.³⁵

Memex tools comb the 'surface web', the commercial, most commonly accessed portion of the internet, as well as the 'deep web', the portion of the internet that is accessible to the public, but not indexed by commonly used search engines. By enabling searches across a wide range of websites, the tools uncover a wealth of information that might otherwise be difficult or time-intensive for investigators to discover. Possible trafficking rings can be identified and cross-referenced with existing law enforcement databases, which helps police officers and public prosecutors map connections between modern slavery and other illegal activity. The tools can also help identify trends, by location and over time, in potential trafficking activity.

Below is a screen shot from the Memex system. This gives a clear opportunity to compare the 'hot' areas with data provided to Eurostat, which would help countries understand whether their view of adult services issues in their country is accurate.³⁶ This type of data could be particularly valuable in strengthening the profiling of source countries, which our report identifies as a major knowledge gap.



35 Information provided to the CSJ by Chris White (DARPA), March 2014

36 Eurostat is the statistical office of the European Union, situated in Luxembourg

Example of the UK cyber framework

Online child exploitation, cybercrime and cyber security sit within established structures in the policing and Whitehall policy apparatus:

- Online child exploitation is owned by the National Crime Agency (NCA) since Child Exploitation and Online Protection (CEOP) moved there after the Agency was fully established in early 2014. The Minister for Organised Crime and the Home Secretary have policy responsibility.
- There is a cybercrime unit at Scotland Yard and the Minister for Organised Crime holds it within the policy portfolio. The Home Office holds a cybercrime strategy. It is also included in the 2013 Serious and Organised Crime Strategy held by the Home Office.
- Cyber security is owned by the Cabinet Office in policy terms although that is shared by the National Security Council and the Security Minister who sits at the Home Office. It was reviewed as part of the Strategic Defence and Security Review (SDSR) 2010; another review will take place in 2015.
- Cybercrime was also reviewed as part of the SDSR 2010 (this report recommends that Cyber Slavery is included in the **SDSR 2015**).

Modern slavery cartels

'I would say there are trafficking cartels working within the Roma Community.'

Former Met Police Officer in evidence given to the CSJ, December 2014

'There were many cells/families of Romanian organised crime involved, there are indications that females were moved/sold between the OCGs and also there was cooperation in the areas used at any particular time, there would never be two cells operating in the same geographical area.'

Investigating Officer from Operation Burgave in evidence to the CSJ, February 2015

In addition to being organised and incorporating new technologies to outwit law enforcement, there is evidence of cartelistic practice being used by OCGs to increase the trade in human life.

In its most basic form, a 'cartel' is defined as *'an agreement or association between two or more business houses for regulating output, fixing prices, etc; also, the businesses thus combined; a trust or syndicate'*.³⁷

Globalisation has allowed for greater trafficking opportunities for OCGs and the ability to control the chain of supply through cartelistic practices. This has been shown recently through Operation Burgave, a joint European investigation into human trafficking in April 2013.

³⁷ Oxford English Dictionary, 3.c [accessed via: <http://findwords.info/term/cartel> (20.04.15)]

Operation Burgave

Two Romanian OCGs were trafficking girls from their home country into Sweden and Northern Ireland. A joint investigation between the two countries was facilitated by Europol and arrests were made. However, what lay behind this case was a pattern which suggested the running of a cartel. The OCGs worked in concert to control the market for prostitution in Sweden and Belfast.³⁸ One OCG would move girls into Belfast for two weeks while the other placed their victims in Sweden for the same two-week period. Victims were exploited through prostitution. At the end of the two-week period, a switch was made. The Belfast girls were trafficked to Sweden while the girls in Sweden were trafficked to Belfast. So both OCGs were regulating output by way of an agreement. Girls were also sold between the two OCGs. This was often done by a member of the criminal gang, sitting in a pub using a laptop: victims exploited, trafficked and sold at the press of a button.

Arrests were made in Operation Burgave and two traffickers received prison sentences. Interestingly, the detective in the case used a technique similar to that used by DARPA but on a smaller scale. The two OCGs advertised the girls online. They also used the 'dark web' to buy stolen credit cards which were used to pay for flying the girls from one country to another (although they slipped up by using their own credit card at one point which directly connected them to travel documents). During the investigation a software technique was used to analyse trends and locations which was eventually used as part of the evidence in a Swedish court to convict the traffickers.

Just as police involved in Operation Joust referred to the existence of '*power pyramids*', some OCGs have mature networks of solicitors, barristers and accountants employed to protect their interests; the big fish never get caught, as the people at the top of the pyramid can be made to look legitimate. And of course money brings power which brings influence. Underneath the top layer lie divisions of foot soldiers who will play their role in whichever division they are employed to operate within to recruit, transit or run the daily management of controlling victims. Staffing up these divisions is said to be very easy: one police chief told us that '*you can cut off the head of a snake and many other heads will appear*'.

Law enforcement must urgently focus on these issues. We have heard how opportunities are being lost through a lack of innovation and a short-sighted approach.

The investigation into what happened in Sweden and Northern Ireland reveals that some OCGs are following a very efficient and profitable business model; they are running modern slavery cartels. Law enforcement needs to follow laundered money and ill-gotten gains to analyse what it is paying for, or funding, at the other end.

We will look at police investigative tools in the next chapter; but what seems obvious is that police should develop strategies now to start looking at the men and women lower down the OCG food chain because one day they might reach the top. And at least law enforcement will know more about them, and have more evidence to pursue them with, than they currently do about existing OCG leaders.

38 See Grant, Douglas M, *Open Source Investigative Tactics in Human Trafficking Operations*, University College Dublin, 26 July 2014

Operation Birkhill

This operation culminated in a long court case which ended in September 2014. Members of an OCG based in the UK were sentenced on three counts: conspiracy to **traffic women** into the UK, conspiracy to traffic women within the UK and conspiracy to control prostitution. They were trafficking girls for sexual exploitation.

Judge Peter Gower QC described the OCG as a *'highly sophisticated business'* that was extremely lucrative. Many of the victims were from Eastern Europe, mainly Hungary and Poland. Some were initially willing participants, others were duped into thinking they were coming to the UK for legitimate work. They were held captive and forced to have sex up to 20 times a day including without a condom, against their will. Their passports were taken from them. Threats were made to subject them to violence or unwanted sexual practices such as anal sex as a method for punishing or disciplining them.

The business involved hundreds of flights of women into the UK. The OCG used the internet to advertise services, but also to dupe victims into being trafficked. Over 40 mobile phones and numerous computers were found at the property, referred to as the *'nerve centre'* of the operation. Numerous properties were rented for use as brothels yielding vast profit; Peter Gower told us that *'it is clear that this was a business which over the years must have generated hundreds of thousands of pounds'*. The head of the OCG, who arrived in the UK in 2003 on a study visa, enjoyed the proceeds of his criminality with an expensive Canary Wharf apartment, three properties purchased in New Delhi and a fancy car. His brother was involved in the money laundering side of the business while working for a respected accountancy company, and sent in the region of £151,000 to India.

As has been evidenced, the OCGs involved in Europe-wide modern slavery operations are interconnected, technologically savvy and colluding in some cases. These are the very attributes which European law enforcement need to take on in order to tackle these criminal groups.

Tackling OCGs' involvement in modern slavery

The consequence of failing to see that modern slavery is hidden in some cases of legal and illegal immigration – such as sham marriages – is that victims are going unidentified. If law enforcement used the tools they have to fight other forms of organised crime to improve their current response, more victims might be found and more OCGs disrupted, or better still, prosecuted.

The CSJ has heard that law enforcement needs to understand the core business of Europe's OCGs and, in turn, how modern slavery fits into that business. This is difficult because modern slavery straddles many areas of police responsibility: for example, cyber, immigration, international policing, child exploitation, and employment law.

Quite often, we were told, the line of responsibility is blurred between the role of police and immigration officials in dealing with illegal immigration. But also blurred is the line between who has been duped and who has paid to break immigration law to stay in a country.

Immigration is a good example of how a lack of an integrated response allows OCGs to operate at relatively low risk. We have been told that law enforcement, along with immigration and government officials, have been slow to fully appreciate the extent to which an organised crime industry has built up around the immigration system. Relevant actors are not attacking the issue as organised crime and so fail to join up the dots in practice. European police interviewed for this report recognise the organised crime angle, but said that trafficking and facilitated immigration are mostly treated as stand-alone issues instead of being seen as part of the wider business model of an OCG.

This means that whatever traditionally falls under the heading of illegal immigration or facilitated illegal immigration continues to be seen as the responsibility of immigration and border officials. Immigration and border officials are not experts in how to disrupt OCGs, making the business of modern slavery low risk and high profit, so the criminal underworld has built networks all over Europe to exploit this inadequacy. As one European Magistrate put it:

'You need a wider perception of organised crime. You tackle all kinds of features of it and need to be aware of them and to be an expert. Having worked in this area for many years I can spot if organised crime is behind a case the minute I read the notes.'

Police and immigration officials across the EU need to take a joined-up strategic approach in both investigating and prosecuting OCG networks. They need to accept that modern slavery cases and organised crime might be hidden within the immigration system and then build a relevant response with a clear set of roles and responsibilities.

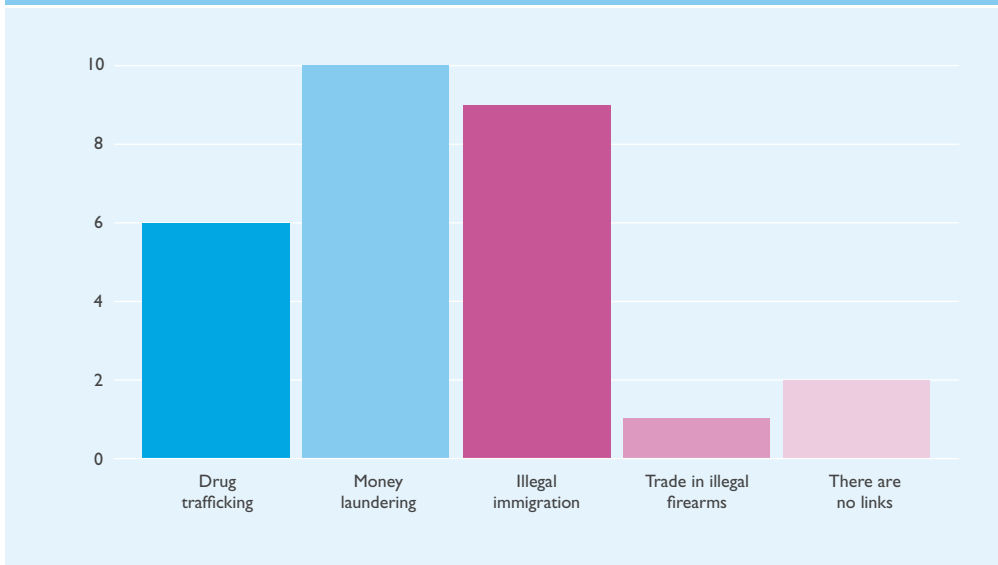
'It is my personal feeling that you cannot be effective in fighting THB unless you are also prepared to fight illegal immigration. This is not because illegal immigration is as serious as THB because obviously it is not. It is because you cannot prevent one thing from becoming another unless you have a joined up approach to THB and illegal immigration. If the police just focuses on THB then you run the risk of having the police look at a limited number of cases and losing a lot more cases that have a great deal of potential to turn into something nastier like THB.'

European Police Chief, in evidence to the CSJ at Europol, The Hague, September 2014

The police response

Our research has shown that the policing community agree that those OCGs involved in modern slavery are likely to be involved in other forms of organised crime such as drug trafficking, money laundering and contraband cigarettes.

Figure 1.2: As well as THB, OCGs in my country are involved in other forms of crime (some countries selected more than one answer)



Source: EU paper survey compiled by the CSJ and distributed by Europol, August 2014

This is significant because as things stand, the law enforcement response to fighting modern slavery does not always share the same characteristics as the operational response to, say, drug trafficking. Indeed, we have heard that many forces pursue these other issues over and above modern slavery because of its relative complexity and because of their own central priorities.

As one country police chief told us:

'While our country is far ahead in terms of THB, this change of shift from a focus on drug and weapon trafficking to a focus on human trafficking has not occurred quite yet.'

There are a few reasons why European law enforcement have to adapt their structures and response to modern slavery to mirror the approach taken with other forms of organised crime. There is a general admission that they are still not very good at proactive investigations. There appears to be a prevailing attitude within European law enforcement that makes it extremely difficult for them to focus, or in some cases turn, their attention on modern slavery. This is largely a problem of how they have traditionally organised themselves and the fear of changing what has already gone before.

The police are keen to work on drug cases as there are strong traditions and well established international structures and relationships. The threshold for getting permission to use certain coercive tools is more often met in drug trafficking cases than for modern slavery cases. Dealing with modern slavery cases is seen as complicated because victims with complex problems are involved and it puts many officers off wanting to work on them. If a law enforcement officer seizes a batch of drugs, then the job is complete. Yet when you find the commodity (human being) in modern slavery cases, the work has only just begun and can be extremely difficult.

It was explained in one of the interviews for this report that a detective who apprehends a van containing 200kg of cocaine is a hero on return to the station and is likely to get a promotion.³⁹ Alternatively, if a van is stopped with six possible victims of trafficking in the back, very often the victims might not yet know that they have been trafficked. It is unlikely that pursuing the case would lead to promotion or congratulation. Indeed, his superiors might not thank him for bringing forward a complex case. Furthermore, it was explained during the course of this research that it can take an officer over a year to prove that those identified are actually victims of trafficking, which takes up substantial police time.⁴⁰

Alongside these issues, police highlighted the difficulties in setting up longer-term operations into modern slavery cases. In modern slavery cases there is a necessity, and sometimes an urgency, to remove the victim from harm, which alerts the perpetrators. Removing the victim, and the judgement on when best to do this in terms of mounting any kind of investigation, therefore acts as a barrier to setting up proactive long-term sting operations targeting OCGs. However, one of the police officers we interviewed had excellent examples of victims being rescued and the investigation continuing. In their experience, while the OCG might go quiet for a while or move the operation to other premises, they will typically not close it down completely following a raid. This requires dynamic decision making by investigators who judge each case on its merits.

There are increasing examples of EU policing using techniques similar to those used for drug trafficking. For example, more destination countries than before have started to see the benefit of embedding officers from high risk countries like Romania into their trafficking units. More specialised units are being set up across Europe and there are an increased number of police forces contacting Europol and Eurojust to ask for advice or to ask for help in setting up joint investigations with other countries. This is a welcome improvement and the benefits of more bilateral and multilateral cooperation will be explored later in this report. There is also some evidence of traditional tools used in fighting other forms of organised crime creeping into the tactics used by some of policing in Europe, for example, the use of informants and covert surveillance. But in some countries, even if they do use these methods to build a case, there is an absence of magistrates who specialise in modern slavery in the way that there are magistrates who specialise in other forms of organised crime, or other specialist areas like rape.

Routinely investigating all areas of business within OCGs would provide much needed knowledge and intelligence that could be shared with other European countries during an investigation, while creating a better picture of trends and flows of victims, and a tighter grip on OCGs. A lack of intelligence and data is often blamed for being a roadblock to building a strong case to take to court (along with other factors like victims dropping out of the investigation half way through because they are so traumatised). In the UK, the Metropolitan Police set up a victim referral team, which acted as the first port of call once a Non-Governmental Organisation (NGO) or the police had identified a victim. This team then co-ordinated between the relevant agencies to progress the case, and often conducted the

39 Off-the-record interview with European Police Chief conducted at Europol, The Hague, September 2014 (recorded and transcribed for analysis)

40 Ibid

initial investigation and debrief. That said, not all victims are debriefed after a case is closed; if done more routinely, authorities could gain more intelligence.

If law enforcement does not start making more use of the tools that are currently available, if it does not start finding solutions instead of problems, if it does not start being more creative and upstream in its thinking, one day soon, those involved may face public outcry. When more victims become survivors, when the public know more than they do now about the tragedy of modern slavery and the lives it has ruined, when lawyers for those survivors start to ask questions, it will be a matter of public record that police knew it was happening yet failed to do enough to put a stop to it. This could be compared to the UK position on child abuse: recent scandals have resulted in the public's confidence in law enforcement being fundamentally challenged.

Chapter One Recommendations

1. National governments must hold law enforcement, borders and immigration officials to account for ensuring that the relevant actors are sufficiently aware and trained to identify modern slavery when it is happening, as well as the organised crime behind it.
2. Law enforcement should pursue more proactive investigations into modern slavery crime, working with immigration and border staff in exchanging information, data and intelligence to create a more complete picture of the way in which an Organised Crime Group is operating and in how many crime types and countries.
3. Law enforcement in the EU should make an assessment of which Organised Crime Groups display cartelistic practices.
4. National governments in the EU should call upon respective law enforcement to review the Organised Crime Groups operating within their respective countries to determine which ones are involved in modern slavery, assessing their international connections.
5. All European national governments should bring forward a Modern Slavery Act to pull all trafficking offences into a single piece of legislation. It should include a maximum life sentence for convicted traffickers which heightens the risk and deterrent for Organised Crime Groups, a clause to protect victims from prosecution and create an Anti-Slavery Commissioner.
6. 'Modern slavery' should be used as a term across Europe, replacing 'Trafficking in Human Beings' (THB).
7. Regulators of the legal and accountancy professions in European countries should introduce a specific system to strike off any lawyer or accountant found to be involved in legitimising any Organised Crime Group involved in modern slavery and publicise the fact to raise industry awareness of modern slavery crime and the organised crime behind it within their own profession.
8. European Commission should take steps to maximise awareness of the European Communities Against Trafficking toolkit across relevant agencies Europe-wide, and maximise its adoption.
9. National governments in the EU should recognise 'cyber slavery' as a distinct crime, separate from 'cyber crime' and 'cyber-enabled crime', to facilitate a tailored response and determine adequate resource.
10. Cyber slavery and modern slavery, as part of the national threat from organised crime, should be included in future Strategic Defence and Security Reviews in the UK.

EU member states as source, transit and/or destination country⁴¹

- **Austria:** destination, transit
- **Belgium:** destination, transit, limited source
- **Bulgaria:** source, to a lesser extent transit and destination
- **Croatia:** destination, source, transit
- **Republic of Cyprus:** source, destination
- **Czech Republic:** source, transit, destination
- **Denmark:** destination
- **Estonia:** source, transit, destination
- **Finland:** transit, destination, limited source
- **France:** destination, transit, limited source
- **Germany:** source, transit, destination
- **Greece:** transit, destination, very limited source
- **Hungary:** source, transit, destination
- **Ireland:** destination, source, transit
- **Italy:** destination, transit, source
- **Latvia:** source, destination
- **Lithuania:** source, transit, destination
- **Luxembourg:** destination
- **Malta:** source, destination
- **Netherlands:** source, destination, transit
- **Poland:** source, transit, destination
- **Portugal:** source, transit, destination
- **Romania:** source, transit, destination
- **Slovakia:** source, transit, destination
- **Slovenia:** transit, destination, to a lesser extent source
- **Spain:** source, transit, destination
- **Sweden:** destination, source, to a lesser extent transit
- **United Kingdom:** source, transit, destination

41 United States of America Department of State, *Trafficking in Persons Report*, June 2014 [see: www.state.gov/j/tip/rls/tiprpt/2014/?utm_source=NEW+RESOURCE:+Trafficking+in+Persons+R]

chapter two

Source, transit and destination countries

All international trafficking involves the 'source' and 'destination' countries of those being kept in or moved into modern slavery. Many cases also involve 'transit' countries through which victims are transported. Because each of these types of country raise different challenges – and require different responses – in this chapter we look at the problems raised by each in turn.

Source countries

It is essential that law enforcement groups across Europe work together to tackle complex Organised Crime Group (OCG) networks. As part of this, destination countries need to do all they can to provide source countries' police forces with the information they need to tackle organised crime in their own jurisdictions. This section looks at what makes a person vulnerable to trafficking and modern slavery in source countries and why it is easy for OCGs to prey upon them.

As a priority, we need to improve our limited understanding of the scale of modern slavery. Precise data on the number of people being trafficked out of the source countries are not available. In part, this is due to the fact that modern slavery is a highly covert crime and many victims do not automatically see themselves as such. It is also an issue of data reliability. An attempt to collect data is made through Eurostat which compiles reports from source, transit and destination countries on identified victims. Between 2010 and 2012, the majority of EU member states provided data to Eurostat on the number of victims, types of exploitation and citizenship of known victims. That said, less than half provided information on the means of recruitment and country of recruitment in the same time period.⁴²

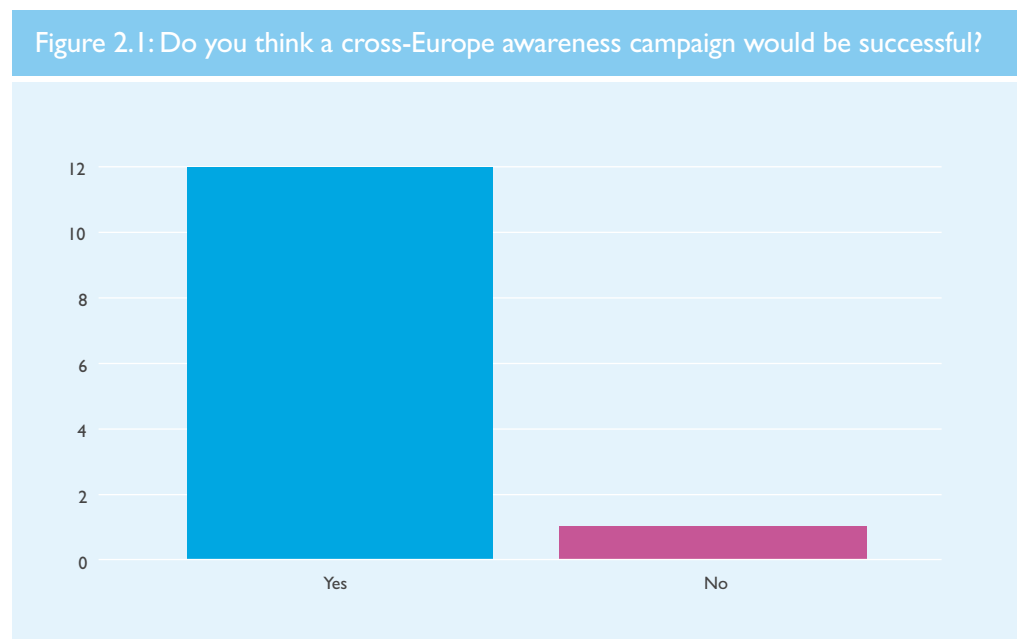
42 Eurostat, *Trafficking in human beings*, Luxembourg: Publications Office of the European Union, 2014, pp 18,41 [accessed via: https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/trafficking_in_human_beings_-_eurostat_-_2014_edition.pdf (19.03.15)]

We need international cooperation to understand why source countries have the problem they do, with their citizens being vulnerable to trafficking, and to help these countries in their fight against modern slavery.

Work within source countries

Working alongside and understanding source countries is paramount, but attempting to encourage governments to do so will be challenging given that making change happen can often be protracted. We must start approaching this problem with ambition and an open mind. We need a new method of understanding how to deal with cross jurisdiction crime in general, and modern slavery in particular, because as things stand perpetrators are walking free and making money while victims in some parts of Europe are particularly vulnerable to exploitation.

We have consistently heard how awareness campaigns are vital. To be effective, they must be aimed at the most vulnerable and again we need valuable information from source country governments about where, geographically, people are most at risk. From the research for this report, for example, time and again interviewees say that victims tend to come from rural parts of their country and exist within small communities. Raising awareness in these quite specific areas and smaller communities is clearly a gap to be closed. Linking rural campaigns up with a nationwide approach will start to reach victims, communities and law enforcement in source, transit and destination countries. This is a project that should be taken up by the European Commission Director-General for Home Affairs as the budget for modern slavery sits within this office. However, Interior Ministers from national governments meet regularly enough to be able to agree joined-up campaigns between individual countries which could provide an additional layer of public awareness campaigning. Law enforcement interviewed for this report were keen to be more joined up as the graph below demonstrates.



Source: EU paper survey compiled by the CSJ and distributed by Europol, August 2014

Profile of a trafficker

Very little has been written about the profile of a trafficker. Based on the research conducted for this report, it seems right to have this section within the source country part of the report because the little we do know about traffickers is that they are often facilitating the trafficking of victims who are the same nationality or ethnic group.⁴³ According to Eurostat, over the period 2010–2012, 69 per cent of traffickers identified, and around three quarters of those prosecuted, had EU citizenship. Around half of those prosecuted were prosecuted in their own country.⁴⁴

They either traffic from the home country or they are positioned in transit or destination countries as part of the wider OCG network. They have often been trafficked themselves or become the controllers at destination – for example, running brothels. In addition, Eurostat's *Trafficking in human beings* report (2014) claims that over the three years between 2010 and 2013, more than 70 per cent of suspected traffickers were male.⁴⁵

*'There is an understanding within our police that this is a big hole in our information and that criminal profiling for perpetrators of THB [Trafficking in Human Beings] is extremely difficult. Sometimes THB cases look like someone who runs a business helping people to emigrate to new roles. Then what happens is that the organisers see that they could make even more profit from cheating the victims out of their wages altogether. Profit is the purpose so people do not decide to become a trafficker, they just decide to become rich.'*⁴⁶

European Police Chief in evidence to the CSJ, Europol, The Hague, September 2014

Traffickers are largely driven by financial incentives or because they have run into financial problems. *'Those who are involved are very often women who have been brought up by the state with no strong family background who are living chaotic lifestyles. It is hard to identify whether these women have been forced into sexual exploitation or whether they have volunteered for sex work before their unfortunate circumstances.'*⁴⁷ Most police interviewed offered this as a description or a profile of a trafficker.

However, this is only relevant to trafficking for sexual exploitation. So it depends on what kind of exploitation we are talking about. In the fisheries industry for example, traffickers can be legitimate business people who are abusing employment laws. The same is true of labour exploitation more widely as businesses drive up profit by using free movement to drive down wages.

It is clear that police do not have a grip on who the traffickers are beyond what is already written. This is probably because they have yet to understand fully the OCGs behind modern slavery. However, of great importance is the need to know the lower and middle ranking traffickers in an OCG, because they might well one day become the top dog. By gathering information on these traffickers now, they will have an insight into their background if they progress up the OCG hierarchy, an insight they are currently lacking. Even if they did know the head of an OCG involved in trafficking, the chances are that that individual has the trappings of a legitimate business person and if police do not watch them on the way up, they will not have a useful background story by way of evidence.

43 The question 'what is the profile of a trafficker?' was asked solely in face-to-face interviews at the Europol Annual Police Chiefs Conference, The Hague, September 2014.

44 Please note that this number is based on less than half the member states providing data for all three years. Eurostat, *Trafficking in human beings*, Luxembourg: Publications Office of the European Union, 2014, pp48,55 [accessed via: https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/trafficking_in_human_beings_-_eurostat_-_2014_edition.pdf (19.03.15)]

45 Ibid, p12

46 Off-the-record interview with European Police Chief conducted at Europol, The Hague, September 2014

47 Ibid

Understanding the issues source countries face

In understanding the drivers of what makes any person – man, woman or child – vulnerable to trafficking and modern slavery there needs to be a joined-up policy making effort by all governments in Europe. Within respective countries, health workers, those working in education, Non-Governmental Organisations (NGOs) and so forth need to be linked up with similar institutions in other countries to share understanding. This is why a single platform is so necessary: it will mean that agencies can tackle the problem without being hampered by their borders.

Some of the major drivers of exploitation in source countries are a lack of opportunity, basic education, and financial insecurity. Although many other people are tricked into modern slavery, we know that OCGs are particularly drawn to those who have little and who are anxious for a better life. We cannot expect the police to be the sole solution to problems deriving from poverty. It is imperative for policy makers in destination countries to reach out to source countries to inform any future policy solutions more effectively. In 2008, the European Commission set up the Group of Experts on Action against Trafficking in Human Beings (GRETA), but in looking at the approach thus far, any coherent cross-Europe strategy is clearly lacking.⁴⁸

The European Commission should review all its anti-trafficking programmes to assess how impactful they are. More needs to be done to create poverty prevention programmes, including work and education, within source countries to tackle this crime.

Countries in Europe are working in silos without tackling the issues at source. As a consequence, OCGs are using their networks to exploit victims from source countries because it is currently low risk while being very profitable.

According to one police interview, *'the profit made by OCGs depends on what sort of exploitation, whether it is labour exploitation, sexual exploitation or sham marriages. If the exploitation is labour the individual who is the victim tends to only receive about £10 per week so the profit margin can actually be very big. Sham marriages are very profitable as well, for between £5,000 and £10,000.'* Furthermore, a recent Europol Intelligence Notification highlighted that the amounts paid to brides range from EUR 400 to EUR 5000.⁴⁹

48 For more information on GRETA, see the Council of Europe website [accessed via: www.coe.int/t/dghl/monitoring/trafficking/default_en.asp (25.03.15)]

49 Europol, Early Warning Notification 2014/8, *Marriages of convenience: A link between facilitation of illegal immigration and THB*, March 2014 [accessed via: www.europol.europa.eu/content/marriages-convenience-link-between-facilitation-illegal-immigration-and-thb (10.04.15)]

Case in point: source country OCG exploiting destination country national welfare systems

A Slovakian OCG duped families into travelling to the UK by coach. Once across the border, the OCG took all their documents and forced the victims into domestic servitude, labour exploitation and benefit fraud.

In relation to benefit fraud, the OCG used the families to fraudulently claim benefits which were then taken for profit by the criminals. Members of the OCG took victims to open bank accounts, using a “translator” who was in fact an OCG operative. Curiously, 99 per cent were opened with a major high street bank – Slovakian Police have no explanation for this. The money made by the OCG from trafficking victims for this kind of exploitation yielded enough profit to build houses in Slovakia which are nicknamed ‘smarties’ because the houses are painted brightly and in different colours.

Legislation has been shown to be effective in preventing such abuses of the benefits system. For example, the OCG that had been trafficking families into the UK to fraudulently collect benefits on their behalf have now redirected their operation. Organised criminals are responsive to policy and legislative change, and redirect their operations swiftly and accordingly. In this instance, and as a result of the UK 2014 Immigration Act, the OCG began trafficking families to Canada, where they would be made to claim asylum because Canadian law permits benefits to be paid to asylum seekers for up to six months whilst their case is considered.

Case in point: example of how young victims were lured into modern slavery in their home country

This example is based on an operation undertaken between the UK and Romania, which successfully led to prosecutions:

‘Between 2008 and 2013 an OCG was active in a rural part of the source country. They were engaged in trafficking minors, living off the earnings of prostitution and money laundering. The innovative movement of money was a significant factor in this particular case.

‘The victims were recruited by the members of the network from families with difficult financial backgrounds. The girls were promised serious relationships and the possibility of marriages with partners in the UK.

‘The traffickers were constantly displaying their ‘high social status’ by driving luxury cars and handling significant amounts of cash so victims were easily lured into deception and in some cases even their parents were convinced of the ‘good intentions’ of the recruiters. Once the future victims and their families gave consent, they were quickly removed from their family and taken to London to allegedly commence work in the supposed companies of their future partners. Once in the UK, documents were taken and shortly after the victims were informed that they were to work as prostitutes. Many were not willing to engage as directed and were then coerced into prostitution by way of verbal and physical abuse as well as debt bondage: they were asked to pay several thousand pounds to pay for their travel and accommodation in the UK.

‘The illicit funds obtained as a result of engaging in prostitution were entirely taken by the traffickers and used to finance a luxury lifestyle, acquire property, high value goods and

cars. A financial investigation was consequently initiated as part of the trafficking case and it transpired that using several money transfer services, the traffickers transferred in excess of £1 million.⁵⁰

From the conversations that we have had for this paper, we think that Interior Ministers in all European countries should set up a conference specifically looking at the issue of modern slavery, with an emphasis on causes. The conference – which should meet and report at least once a year – should aim to galvanise policies within respective countries that complement and contribute to those in others. Those policies should provide leadership by bringing together police, ambassadors, NGOs, health and education representatives, tax and customs officials, borders and immigration officials, labour exploitation experts, criminal investigators and any other relevant criminal justice representatives and employers. All participants should be given a list of tasks to satisfy by the time of the next conference. Each Interior Minister would take it in turn to chair each year. They should each present a document outlining operational successes and failures, and what can be learned from previous mistakes. A single individual can then distil the most salient points into a single document, with policy to be adopted by all member states.

Examining how the vulnerable are such easy targets for OCGs looking to profit from their exploitation, it is sensible to conclude that using targeted tactics and strategies to reduce harm for such individuals is a matter of immediacy. We only have to look at how **children** are being trafficked for profit to understand what importance needs to be placed upon this problem in source countries.

OCGs exploiting children from source countries

In the Eurostat report *Trafficking in human beings* (2014), most countries recorded whether a trafficking victim was a minor or an adult, but less than half provided an age breakdown for the majority of other information, for example, exploitation, citizenship, means of recruitment, or received assistance.⁵¹ This makes it difficult to identify groups of children who are particularly at risk, or understand how child victims are being dealt with – for example whether they are being treated as offenders.

Europol intelligence shows that minors are typically trafficked from families in difficult economic circumstances.⁵² Such families from source countries are specifically targeted by OCGs. They use complicit money lenders to push these families further into debt. Extremely high interest rates prevent families from paying off their debts and forces them into an exploitative situation. Children can be easily recruited, indeed they are sometimes sold by their families to the traffickers. OCGs involved in trafficking children for forced begging specifically target vulnerable people such as children in orphanages, young adults with disabilities, or single mothers with children because these kind of children provide perpetrators with higher incomes as a result of begging.⁵³

50 Written response from a paper survey completed by police members conducted for this report and co-ordinated through Europol, August 2014

51 Eurostat, *Trafficking in human beings*, Luxembourg: Publications Office of the European Union, 2014, Chapter Four [accessed via: https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/trafficking_in_human_beings_-_eurostat_-_2014_edition.pdf (19.03.15)]

52 Europol, Intelligence notification 16/2014, *Child trafficking for exploitation in forced criminal activities and forced begging*, October 2014 [accessed via: www.europol.europa.eu/content/child-trafficking-exploitation-forced-criminal-activities-and-forced-begging (19.03.15)]

53 Ibid

OCGs find it easy to deal with minors because they can be easily, cheaply and discreetly maintained. Traffickers often do not need to resort to physical violence which would make the exploitation more visible. Trafficked children do not consider themselves to be in an exploitative situation, but rather perceive their exploitation as loyalty to their family (a sort of 'Stockholm syndrome').

OCGs involved in child trafficking do so by maintaining constant surveillance of their victims, pushing them to commit crimes whilst pressuring them to evade the law. In this scenario, children lose the right to a safe childhood with their families and the freedom to grow up without fear of exploitation. Indeed, they lose their childhood completely. Sadly, many of those who do come to light and are then taken into care often either abscond or are vulnerable to re-trafficking (or indeed become traffickers themselves).

Forced begging is one form of exploitation that children face, but so too are sexual and labour exploitation. **Operation Lakeland**, a joint operation between police in Slovakia and Kent including Children's Social Services, Health Education, the National Crime Agency, West Yorkshire and Kent Police is an example of the enslavement of children facilitated by OCGs for the purposes of sexual exploitation. This operation was also supported by police in Slovakia and the Czech Republic.

Operation Lakeland involved victims largely from Slovakia who were trafficked within the UK. There has been evidence that these children were being kept for periods of time under the influence of drugs and alcohol, which made it incredibly easy to force them to do things. The Operation included police from Slovakia working in the UK with Kent Police. The CSJ was told that having Slovak officers on the case improved the cooperation of the suspects because of the removal of the language/cultural barrier. In one day, 22 suspects were arrested, 12 of whom were Slovakian. On the same day, 16 children were taken into protection and were not sent back to their families as it was seen as dangerous due to the significant risk of being exposed to harm.

Pregnant women are also sometimes recruited and forced to sell their babies. **For trafficked children between the ages of six months and 10 years, OCGs can pay between EUR 4,000 and EUR 8,000. In some cases children have been sold for up to EUR 40,000.** In others, illegally adopted children are trafficked for exploitation.⁵⁴

Identifying any victim of modern slavery is difficult but identifying a child is even more challenging. To compound this difficulty, children forced to commit crimes are often treated as offenders. Given that the EU Trafficking Directive (2011/36/EU) requires member states to implement non-prosecution provisions (in the UK it is enshrined in the 2015 Modern Slavery Act) it is disappointing that this is still happening. Member states clearly need reminding of the terms of the Directive.

A reminder of all the terms of the Directive needs to be on the agenda of Justice and Home Affairs (JHA) Council meetings and member states should be explicit about what, if anything,

54 Ibid

they are doing to implement these terms: *'Member States shall, in accordance with the basic principles of their legal systems, take the necessary measures to ensure that competent national authorities are entitled not to prosecute or impose penalties on victims of trafficking in human beings for their involvement in criminal activities which they have been compelled to commit as a direct consequence of being [trafficked]'*.⁵⁵

In some countries, the private sector and law enforcement are working together to combat the problem of children being forced to steal and shoplift. This collaboration involves comparison of data on the adults who are picking up the children who are caught.⁵⁶

It is clear that dealing with children who are trafficked is not an easy job for police and they need help and support from policy makers, NGOs and child safeguarding practitioners. Each country's safeguarding agency should also be using a standardised approach to victims of modern slavery: often, the victim will want or need to be returned to their country of origin, but with adequate support.

Connecting source and destination countries

What is known as a 'Police Liaison Officer' are police officers from source countries based in Embassies in destination countries within Europe. Europol have 180 'Europol Liaison Officers' at The Hague – 144 from the EU and the rest are from international organisations, such as Interpol.⁵⁷ Many were interviewed for this report and appeared creative and international in their thinking. In the future, law enforcement could look to expand this model given that modern criminality, more often than not, has an international, cross-jurisdictional angle.

Police Liaison Officers are critical in linking up source country knowledge and intelligence with police in destination countries who seek to identify victims and investigate OCGs. Those interviewed for this report have become expert in the field of modern slavery. They are often involved in the setting up of Joint Investigation Teams (JITs – for more information, see Chapter 3) between their home country and other countries involved in the investigation of a criminal group working out of more than one country. Moreover, they are regularly the first point of contact for police in destination countries who are looking for assistance if they have identified victims.

An issue we have identified is that Police Liaison Officers will often send data straight to their own country and so they can never be sure if Europol receives it or not. This has clear implications for the amount and quality of data received and analysed by Europol, and so gathering a wider intelligence picture of OCGs and the networks they use in more than one country suffers as a consequence. However, a Police Liaison Officer mostly works in a team

55 Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011, on preventing and combating trafficking in human beings and protecting its victims; and replacing Council Framework Decision 2002/629/JHA, Article 8 [accessed via: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:101:0001:0011:EN:PDF> (19.03.15)]

56 Europol, Intelligence notification 16/2014, *Child trafficking for exploitation in forced criminal activities and forced begging*, October 2014 [accessed via: www.europol.europa.eu/content/child-trafficking-exploitation-forced-criminal-activities-and-forced-begging (25.03.15)]

57 Information provided privately to the CSJ

of one and is therefore under pressure to work as quickly s/he can when presented with a case and/or victim. As one told us:

'I have worked in this area for many years so I have built up contacts. This makes it very easy for me to share data but it should be far easier for the majority of police to do so. If I receive any data I will send it straight through to my country so I cannot be sure that Europol will receive this information. This is because I am just alone here so I cannot do it all. There are hundreds of victims that we are talking about here and hundreds of organised crime groups.'

We look at data sharing later in this report, but for the purposes of this section it is right to note that Police Liaison Officers are in the very useful position of spotting trends, such as how OCGs move around, the tricks they use and the exploitation they impose on victims. There ought to be a place to put that knowledge so that analysis can be carried out on all the information floating around the system which is currently going to waste.

The current methods of information exchange allow the criminal to operate with impunity. Often, exchange of information takes weeks or months. By this time, the criminal may have changed the victim, venue, money route, phones and members of the group. This slow-paced response requires urgent review. Intelligence-led policing in its current format is not necessarily intelligent policing.

Transit countries

It is essential that we devise new means of disrupting the routes OCGs use to transport people from source to destination countries. This section argues that through better pooling of data and intelligence, law enforcement agencies will be better able to identify victims in transit and trace the people who are controlling them.

The challenges of intercepting traffickers in transit are clear but need to be further explored by law enforcement, policy makers, borders and immigration officials, and in consultation with former victims to gain a better understanding about the tactics used to move victims around. With a better picture we could construct better awareness campaigns at ports to mitigate the problem of victims, while in transit, being unaware at this stage that they have been duped into a life of exploitation. Moreover, with a better and more comprehensive picture of how OCGs use weaknesses in our different laws across Europe, work can begin to reform existing legislation, law enforcement tools and policies.

We need to be more intelligence led operationally at points that we know are used as staging posts in Europe for the transit of victims. One source country police chief explained how coach companies were used as the main form of travel by OCGs moving victims through the Schengen zone. One of the recommendations of this report is to attach certain conditions to licence applications by any coach company seeking to operate routes around Europe (see Chapter Two recommendations).

Transit into the UK

As part of this research, police told the CSJ that smaller airports such as Bristol and Luton are used by traffickers more than larger airports, as budget airlines predominantly fly to these airports. However, published UK intelligence on trafficking routes into the UK appears thin. The National Crime Agency's 2014 report, *The Nature and Scale of Human Trafficking in 2013*, cites that 'there is limited information available regarding specific routes of entry to the UK.'⁵⁸ Part of the complexity appears to be the variety of entry points used – the report cites that common methods beyond budget airlines include coaches, clandestine entry in lorries, ferry ports and the Channel Tunnel.

The UK Border Force does train some of its staff in spotting the signs of trafficking by asking the right questions, and they have in the past run awareness campaigns at airports. However, as long as it is acting in isolation, it can't really be expected to target OCGs in transit with victims successfully.

It was also reported to the CSJ that the Schengen Area is regularly exploited for criminal activities by OCGs using coach companies to transport victims of trafficking (see Chapter Two recommendations).

Passenger Name Records could provide the answer for improved data sharing

*'Policies enabling free trade and movement across the EU are exploited by organised crime in trafficking and fraud. The free movement of people and goods across the EU's internal borders reduces the chance of detection. Changes in the Schengen Area and EU membership will open up potential new opportunities for OCG traffickers.'*⁵⁹

Europol

To date, little thought has gone into how we can overcome the challenges in stopping OCGs in transit. Notwithstanding the problem that victims might not recognise at this stage that they are being trafficked into a life of modern slavery, OCGs exploit agreements and policies like Schengen and Free Movement, and any weaknesses in the system. They know only too well how to make European law work for them to maximise profit. On the face of it, the problem of what to do about transit countries appears insurmountable, but it is worth considering because the future of crime, being increasingly borderless, will be riddled with similar challenges and policy makers should start thinking creatively about how to overcome them.

*'Moving children across controlled borders is relatively uncomplicated. In many cases, the victims travel on genuine passports of non-related adults. The OCGs involved in these types of exploitation are very mobile and typically active in several countries making use of contacts and diaspora communities.'*⁶⁰

Europol

58 National Crime Agency, NCA Strategic Assessment: The Nature and Scale of Human Trafficking in 2013, September 2014, p18 [accessed via: www.nationalcrimeagency.gov.uk/publications/399-nca-strategic-assessment-the-nature-and-scale-of-human-trafficking-in-2013/file (12.03.15)]

59 Europol, EU Serious and Organised Crime Threat Assessment, 2013, 1.9, p16 [accessed via: www.europol.europa.eu/content/eu-serious-and-organised-crime-threat-assessment-socta (24.03.15)]

60 Europol, Intelligence notification 16/2014, *Child trafficking for exploitation in forced criminal activities and forced begging*, October 2014 [accessed via: www.europol.europa.eu/content/child-trafficking-exploitation-forced-criminal-activities-and-forced-begging (27.03.15)]

In terms of how we improve attempts to stop modern slavery crimes in transit, there is one glaringly obvious piece of European legislation which would give police improved, real time airline data on the movement of OCGs as a whole, and more specifically traffickers: Passenger Name Records (PNR) data.

PNR consist of non-sensitive data a passenger gives their airline company in the course of their booking. They tend to provide more detailed information than Advance Passenger Information (API) which is currently used as a source of information. Whilst the PNR data sets collected by each company can vary in terms of quality and quantity, there are still extremely useful data that would allow police to track:

- who paid for tickets;
- where they are flying to;
- how many people they are with, and so on.

PNR provides this by collecting information on:

- how the travel was reserved;
- how the travel was paid for;
- payment details;
- contact details like phone number and email address; and
- full travel itinerary and seat allocations.

Trained operators can analyse the information and assess whether action is required on a case-by-case basis. The data is processed to:

- identify previously unknown passengers who display high risk characteristics based on travel related behaviours; and
- enrich API, improving the effectiveness of alerts relating to individuals of interest.

The analysis of PNR is an established mechanism in the prevention, detection, investigation and prosecution of serious, organised crime. It provides important data in allowing the identification of those purposefully seeking to avoid detection, like OCGs engaged in modern slavery. It can be used to detect suspicious travel patterns and behaviours, enabling the identification of individuals previously unknown to law enforcement agencies.

Current PNR data legislation makes it compulsory to share data between the European Union and America. It is not a legal requirement to share within the EU.

A major stumbling block to PNR being available is that European Interior Ministers and the European Parliament cannot agree any legislative changes needed to provide what is known as 'EU PNR'.⁶¹ The reason for this lies in the varying degrees to which member states and the European Commission agree about the balance between data sharing/retention and individual

61 See European Parliament News, *EU Passenger Name Record (PNR) proposal: what's at stake*, 26 January 2015 [accessed via: [www.europarl.europa.eu/news/en/news-room/content/20150123BKG12902/html/EU-Passenger-Name-Record-\(PNR\)-proposal-what's-at-stake](http://www.europarl.europa.eu/news/en/news-room/content/20150123BKG12902/html/EU-Passenger-Name-Record-(PNR)-proposal-what's-at-stake) (09.04.15)]

privacy. Given the EU already shares PNR data with America, a country outside the Union, it seems odd that we would restrict sharing key data that could save lives amongst member states.

Since the terrorist attacks in Paris, there have been fresh calls to bring forward PNR-sharing legislation within the EU. In February 2015, the European Parliament passed a resolution on anti-terrorism measures in which it committed to finalising an EU PNR Directive by the end of the year.⁶² The European Parliament is currently considering the scope of the legislation and whether serious, organised crime should be included in the scope along with counter-terrorism.

In terms of scope, EU PNR should, without any ambiguity, include modern slavery crime and all other forms of organised crime. All member states must make this case.

One of the most serious unintended consequences of Free Movement in the EU is that it has made it much easier for OCGs to operate their cross-border business models with impunity and without fear of being detected and therefore pursued. As one police chief told the CSJ during this research:

'Free Movement presents a great opportunity for this kind of criminality and allows traffickers to evade prosecution'.

This is utterly unacceptable. The European Parliament, Council of Ministers and European Commission should consider how vulnerable victims are being used and abused more easily because of their failure to agree Free Movement reform. And EU PNR should be seen as a positive mitigation in preventing the unintended consequences of Free Movement.

Destination countries

Moving along the trafficking chain from source and transit to destination country, this section looks at what makes a destination country attractive and what more can be done by law enforcement and policy makers.

The destination countries most attractive to OCGs dealing in cross-border modern slavery crime have the following features:

- ability to maximise profit;
- opportunity;
- low risk;
- ease at the border; and
- diaspora links in destination country.

To a typical OCG, the ideal environment is low risk, high profit:

'OCGs involved in trafficking in human beings service well established illegal labour and sex markets in all Member States and especially in destination countries in Central and Western

⁶² Ibid

*Europe. These markets generate huge profits for the OCGs involved, which are laundered, transferred and invested in source, transit and destination countries. The constant demand for services associated with sexual and labour exploitation and persistent socio-economic inequalities between the developed and developing world drive human trafficking.*⁶³

Risk for OCGs in destination countries is dependent on how (un)successful law enforcement and other relevant authorities are in disrupting OCGs involved in modern slavery. OCGs involved in modern slavery and human trafficking will seek to exploit the strong demand and **ready supply of migrants to recruit victims and service labour exploitation markets in prosperous member states.**⁶⁴ As long as there is demand for cheap labour and for sexual exploitation in whatever shape it takes, then OCGs will flourish by recruiting a supply of vulnerable victims, who will continue to be in a position of harm until they are identified by the authorities.

Creating a hostile environment for OCGs in destination countries

Despite the majority of countries in our paper survey recognising the links between THB and other forms of crime, law enforcement do not have a good enough grip on the OCGs involved in modern slavery networking in and out of their respective countries. Less than half of the EU member states provided data to Eurostat on the breakdown of the types of crime that traffickers were involved in, or the number of traffickers involved in organised crime. Just four countries provided a total value of assets confiscated from convicted traffickers.⁶⁵

In the context of Europe, legal immigration can often act as a camouflage. The challenge for law enforcement is looking more closely at, say, a Romanian young adult who has been picked up for begging or stealing. That person might well be in the country legally (making it less obvious that they might have been trafficked) and they may well have been committing a crime, but police need more training across the European Union to be able to spot whether there is more to it. Has the Romanian been lured into the destination country to commit crime to profit an OCG? Has that person been trafficked, possibly sold between OCGs and subsequently exploited and kept in terrible conditions?

Law enforcement have told us that there is an incomplete intelligence picture, claiming there is a lack of information to show where, how and when the OCGs employ resources to move their victims. In the case of drugs and other forms of organised crime, traditional policing intelligence tools are often key to gathering information. Networks of Covert Human Intelligence Sources (informants), telephone interceptions and anonymous tip offs often pave the way for the deployment of substantial law enforcement assets on drug trafficking. The same should be used for the trafficking of human beings into modern slavery.

63 Europol, EU Serious and Organised Crime Threat Assessment, 2013, 2.3, p24 [accessed via: <https://www.europol.europa.eu/content/eu-serious-and-organised-crime-threat-assessment-socta> (19.03.15)]

64 Ibid

65 Please note that this is a three year mean. The annual figures for 2010–2012 were five, six, and four (respectively). Eurostat, *Trafficking in human beings*, Luxembourg: Publications Office of the European Union, 2014, p19 [accessed via: https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/trafficking_in_human_beings_-_eurostat_-_2014_edition.pdf (19.03.15)]

In Italy, police get access to communications intercept within the hour, which gives them all the evidence they need to prosecute and relieves the victim from the stress of providing testimony. UK sources during this research suggested that communications intercept is not used as frequently as it is in drug trafficking and other serious crime cases. It was explained as a matter of prioritisation. If these sources are right, then the culture within UK policing should change and modern slavery cases should be given the same level of priority as other forms of serious crime.

Across Europe, covert and overt techniques that are available for the investigation of serious crime such as drug trafficking are equally available for modern slavery crime and should be deployed during relevant investigations. In the UK, we use the following to investigate serious, organised criminality:

- Regulation of Investigatory Powers Act, Schedule 1 (Intercept);
- directed surveillance;
- intrusive surveillance;
- telecoms data;
- test purchase;
- infiltration – including marked money;
- financial data;
- flight data;
- ferry data;
- coach and transport hubs;
- working with letting and estate agents;
- HMRC included in investigations; and
- DWP used for information gathering in investigations.

Evidence given to the CSJ shows that in the UK modern slavery cases struggle to meet the threshold for these powers. More often than not, investigators on these cases compete with colleagues working on other organised crime cases for access to these powers. According to our source, modern slavery cases are put to the back of the queue or police do not bother to apply as there is confusion over the threshold (which needs to be met for sign off) and whether modern slavery crime meets it. If this is true, there needs to be new guidance drawn up within the UK law enforcement community about how to apply for the use of these techniques to modern slavery criminality.

Law enforcement in destination countries should start investigating modern slavery as an organised crime and using the intercept tools at their disposal to do so. In Italy, the human trafficking unit sits within the mafia unit which means they share public prosecutors for investigations. The tools at the disposal of these prosecutors are the same as those used in mafia cases.

The lack of proactive investigations into modern slavery also means that we are not following the money. We **do not** know what criminal money is paying for and who is in receipt at the other end. One European Magistrate, interviewed for this report, was asked what more destination countries could do. The response was clear: *'there is a need to get tougher. To hit OCGs where it hurts... the money but coupled with a lengthy custodial sentence is often fatal to them'*.

Raising awareness

Whilst awareness of modern slavery is gaining pace there is much to be done in terms of training police in how to spot it. The public are still not fully aware of what modern slavery is, what is behind it and how it manifests itself. The European police interviewed said that using the term modern slavery would help to raise awareness about what the crime actually involved. Using a more descriptive term helps and gives governments something to build upon for government awareness campaigns.

When the UK Government launched its modern slavery awareness campaign, along with a new helpline, for the duration of the campaign the helpline received calls. A government insider revealed during this research that the helpline has not had any calls in the months after the advertising campaign came to a close. This proves that campaigns work. But it also proves that unless raising awareness is a constant prevention tactic used by all actors in the field of modern slavery, then it will not have long-term impact.

We asked European law enforcement if they would be interested in joining forces with other countries in Europe for raising awareness campaigns. The response was positive with most agreeing that they would. In terms of reducing demand for the services that OCGs sell by exploiting victims, raising awareness within communities in destination countries is absolutely vital. As one European Police Chief told us, we need to get better at informing the consumer of what they are purchasing.

Issues with available data for evidence on victims in destination countries

*'Given the hidden nature of the phenomenon there is only limited information available on trafficking for forced labour.'*⁶⁶

A. Jokinen

For destination countries, it is very difficult to develop an understanding about the nature of the problem without good data, and getting good data on flows, trends and numbers is acknowledged by most as being very challenging. This makes it hard for policy makers to devise solutions and set strategy. Some academics go further:

*'Over the past 20 years, human trafficking has generated a tremendous amount of public attention throughout the world. The problem has received growing coverage in the media; anti-trafficking activism has skyrocketed; and most countries have created new policies, laws, and enforcement mechanisms to tackle the problem. Yet much discourse, policymaking, and enforcement has lacked an evidence base, because so little high-quality research has been done on the topic.'*⁶⁷

66 Jokinen, A et al, ed, *Trafficking for Forced Labour and Labour Exploitation in Finland, Poland and Estonia*, Helsinki: European Institute for Crime Prevention and Control, 2011, p 11 [accessed via http://heuni.fi/material/attachments/heuni/reports/6KmRLQd2d/HEUNI_report_68_netti.pdf (19.03.2015)]

67 Weitzer, R, 'New Directions in Research on Human Trafficking', *The ANNALS of the American Academy of Political and Social Science*, 653, 2014, pp6–24 [accessed via: <http://ann.sagepub.com/content/653/1/6.full.pdf+html> (19.03.15)]

In the UK we can look at referrals to the National Referral Mechanism (NRM) for numbers of possible victims. Not every country in Europe has a NRM so it is impossible to compare with other countries on that measure. There is an urgent need to review how member states collect data. Eurostat is the central body in Europe responsible for collecting statistics and data from member states.

Difficulties in gathering useable data on modern slavery are long-recognised and a decade worth of papers on the subject are well referenced in the report *Trafficking for Forced Labour and Labour Exploitation in Finland, Poland and Estonia* (2011).⁶⁸ The challenges were most recently highlighted by Eurostat's significant effort to quantify the issue. By the report's own admission the variance in reporting methods and gaps in data provided by member states limit – and in some cases negate – the reliability and comparability of the data. In particular, trend increases and decreases may be due to legislative and reporting changes within countries, and comparisons between member states *'should be avoided'*.⁶⁹ In many cases, too few countries have provided data to draw a meaningful EU-wide conclusion on a given aspect of THB.⁷⁰ This is not sustainable and must be improved upon. This report recommends naming member states that do not take a lead on improving how to collect and share good quality statistics and data.

Difficulty in scaling the issue leads to problems in prioritising resources. It is therefore easier to allocate resource to competing serious crime so it is vital that work is done to gather more reliable data to provide law enforcement and national governments with an evidence base.

*'I would say there is a lack of cooperation with other countries that can be an obstruction to investigating THB cases. There should be a global data sharing project on the issue as getting data from other countries is very time consuming. There is not enough time to investigate all cases fully and to do proactive investigations. We need more human resources rather than financial resources.'*⁷¹

Professor Bernard Silverman, Home Office Chief Scientific Adviser, has provided a summary of his methodology to the CSJ, which could be proposed as an approach to be adopted as a common standard. He estimated that in one year there were between 10,000 and 13,000 potential victims of modern slavery in the UK.⁷²

68 For more information, see Jokinen, A et al, ed, *Trafficking for Forced Labour and Labour Exploitation in Finland, Poland and Estonia*, Helsinki: European Institute for Crime Prevention and Control, 2011 [accessed via http://heuni.fi/material/attachments/heuni/reports/6KmRLQd2d/HEUNI_report_68_netto.pdf (19.03.2015)]

69 Ibid

70 Eurostat, *Trafficking in human beings*, Luxembourg: Publications Office of the European Union, 2014, pp10,18,19 [accessed via: https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/trafficking_in_human_beings_-_eurostat_-_2014_edition.pdf (19.03.15)]

71 From face-to-face interview conducted at the Hague

72 HM Government, *Modern Slavery Strategy*, London: Her Majesty's Stationery Office, 2014, p17 [accessed via: www.gov.uk/government/uploads/system/uploads/attachment_data/file/383764/Modern_Slavery_Strategy_FINAL_DEC2015.pdf (27.03.15)]

Professor Bernard Silverman methodology behind estimated number of victims in the UK

There are a number of reasons why it is difficult to quantify the full extent of modern slavery, which is very much a hidden crime. Victims are unlikely to be reached by conventional victimisation surveys, because they may return to their country of origin, or may be too ashamed or fearful to come forward, or may still be in servitude or under control, or may not even be recognised, even by themselves, as victims of modern slavery.

Exercises such as the National Crime Agency's (NCA) Strategic Assessment work by collecting data and information about victims from a wide range of different organisations and sources, such as police forces, government and non-government agencies, charities, the general public, and so on. These data are highly sensitive and often only made available under strict understandings of confidentiality. In 2013, this exercise identified 2,744 unique potential victims of trafficking, but this does not include any estimate of the potentially much larger "dark figure" of cases which did not come to the NCA's attention at all. Home Office research, led by Professor Silverman, applied the technique of multiple systems estimation to the NCA data and arrived at an overall confidence interval of between 10,000 and 13,000 for the number of potential victims in the UK.⁷³

The method works by collating the data into a small number of different lists according to the type of source: police, government organisation, NGO, general public, local authority. Some cases appear on more than one of the lists. By fitting an appropriate statistical model to the pattern of appearance on lists and overlaps between them, it is possible to get an estimate and confidence interval for the numbers that do not appear on any list at all. This approach triangulates from the known cases, and the way that they have come to attention, to give some quantification of the cases that were not known to the Strategic Assessment. It is a generalisation of the classical "capture-recapture" method for estimating the size of a population, used especially for wildlife.

In social science contexts, multiple systems approaches have been used, for example, in correcting the UK census for undercount, and for estimating the numbers of casualties in conflicts and the numbers of intravenous drug users in a city, but this is probably the first scientific attempt to estimate the total extent of modern slavery including the figure of unknown cases.

Labour exploitation in destination countries

Victims end up in destination countries like the UK having been trafficked by OCGs for a variety of different forms of exploitation, normally dependent on age or gender. In other words, the victim, or the 'commodity' as the criminal group sees them, is used in a way to meet market demands.

Overall, more is known about sexual exploitation compared to labour exploitation. Some academics suggest that this is because some NGOs involved in the area of modern slavery grew out of concerns with prostitution. In the interviews conducted during the course of research, some police argued that the biggest factor is the traditional 'vice squad' focus of law enforcement agencies. As well as 'old habits die hard', prostitution can be seen by police to

73 Ibid

be easier to tackle because it is associated with red light districts and deprived areas, whereas labour exploitation can be happening on any farm or factory in the country.

Labour exploitation should not be overlooked at the expense of focusing on other forms of modern slavery. As one European police chief put it:

*'Sexual exploitation is more damaging to the victim but labour exploitation is more prolific. In the current economic crisis, there is a golden opportunity to reduce prices by using victims of forced labour.'*⁷⁴

There is an urgent need for more evidence on labour exploitation in destination countries. A cheap jobs market creates a fertile profit making market for OCGs. National governments in destination countries need to be able to distinguish between bad working practices and OCGs trafficking victims for the purpose of labour exploitation.

Case in point: Labour exploitation case in Portugal

Three Romanian citizens complained to the local authorities about the actions of their employers, whose activities could be considered to be modern slavery. Judicial Police were called and started an investigation.

15 victims had been taken by bus from Romania to Spain to work in agriculture, and from there to Portugal, for fruit and olive picking.

They were hired in Romania, with the promise of free transportation, food and housing, as well as EUR 400/EUR 500 per month.

What actually happened to the victims when they reached Portugal was:

- their identification documents were taken away;
- they only received a sandwich for lunch and one meal (soup) at night;
- they were housed in an abandoned bakery and slept on mattresses on the floor;
- they were charged for the trip from Romania and Spain, water, electricity and house rent;
- they were threatened and physically assaulted;
- all the victims lost weight (one lost 20kg in two months);
- they worked seven days a week; and
- some money was paid to them after police intervened.

A Legitimate Business Structure (LBS), created in Portugal by a Romanian citizen, was used to contact and make legitimate contracts with farmers or farming companies. But no taxes were paid by the business, no insurances or salaries, the workers were not registered in Portugal, and no working contract was issued.

74 Off-the-record interview with European Police Chief, The Hague, September 2014 (recorded and transcribed for analysis)

After rescue, the victims were helped by governmental institutions in terms of housing and meals, until they were returned to Romania.

The six accused (all Romanian citizens) were convicted to a total of 24 years and three months imprisonment.

Case in point: Unpaid/illegally low paid workers

In the 2011 report *Trafficking for Forced Labour and Labour Exploitation in Finland, Poland and Estonia*, it was noted that 'while trafficking for sexual exploitation has over the last decade or more been the target of extensive campaigning, awareness-raising and research, forced labour has come to the forefront only lately.' Joniken et al go on to cite the reasons – further integration of the European labour market, concealment within existing legal labour markets, and low visibility due to an outdated public image of trafficking for forced labour.⁷⁵ This was evidenced in Eurostat's 2014 report by the number of countries able to provide data on different forms of exploitation. For the years 2010–12, 15 out of the 28 member states provided data on sexual exploitation while only seven out of 28 provided data on labour exploitation. 10 out of 28 provided data on other forms of exploitation combined.⁷⁶

In the UK, an organisation called the Gangmasters Licensing Authority (GLA) is involved in operations around labour exploitation. The GLA say that about 70 per cent of cases they look at have organised crime behind them, while the other 30 per cent comprises businesses who are being tightly squeezed by an OCG or by supermarkets to make a profit, so they are drawn into the world of cheap labour.⁷⁷

High risk areas for victims of trafficking for forced labour consist of construction (more specifically renovation as opposed to building work), cleaning of hotels and offices, car washes and care homes.

As part of the UK Government's Modern Slavery Strategy, the GLA is expected to network with the equivalent bodies around Europe.⁷⁸ A Europe-wide approach to operations and information gathering is welcome. However, for the avoidance of confusion about what the GLA is when they are working with other countries, the GLA should have its name changed to the Labour Exploitation Unit so it is clearer what its role is. Furthermore, the new Labour Exploitation Unit should receive a financial boost from the UK Home Office to allow the organisation to make the most of working with the rest of Europe, while commissioning more research on labour exploitation and carrying out more operations that would include a wider remit than it currently holds. This wider remit would encompass the high risk sectors mentioned earlier: construction, cleaning, car washes and more powers to investigate fishing and maritime industries.

75 Jokinen, A et al, ed, *Trafficking for Forced Labour and Labour Exploitation in Finland, Poland and Estonia*, Helsinki: European Institute for Crime Prevention and Control, 2011, p9 [accessed via http://heuni.fi/material/attachments/heuni/reports/6KmRLQd2d/HEUNI_report_68_netti.pdf (11.02.2015)]

76 Eurostat, *Trafficking in human beings*, Luxembourg: Publications Office of the European Union, 2014, p57 [accessed via: https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/trafficking_in_human_beings_-_eurostat_-_2014_edition.pdf (19.03.15)]

77 Data provided privately to the CSJ by the Gangmasters Licensing Authority

78 For more information, see HM Government, *Modern Slavery Strategy*, London: Her Majesty's Stationery Office, 2014 [accessed via: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/383764/Modern_Slavery_Strategy_FINAL_DEC2015.pdf (19.03.15)]

Chapter Two Recommendations

Source countries

11. National governments in the EU should have an organised crime and modern slavery impact assessment for every new policy/policy change relating to crime, policing and immigration policy.
12. Law enforcement leaders should introduce a single protocol document to be completed by any officer dealing with a modern slavery case that is accessible by other police forces and Europol in order to increase intelligence sharing.
13. National governments should seek to bring together operational actors with policy makers in pursuit of policy with impact. This will have the positive effect of creating policy which is easily accessible and translatable by those implementing it.
14. The number of Police Liaison Officers should be increased and they should have better links with national governments in the countries where they are based.
15. The EU Commission should review all its trafficking projects to evaluate outcomes.

Transit countries

16. The European Commission, Parliament and Council of Ministers need to urgently agree the scope of EU PNR to include modern slavery and other forms of organised crime.
17. Budget airlines flying from source countries to destination countries should partner with national governments for public awareness campaigns and the exchange of information about subjects of interest.
18. EU countries with a particular emphasis on those in the Schengen Area, as part of their strategy to combat modern slavery, should more closely monitor the coach sector. A condition of issuing licences to coach companies should be that they prove they have measures in place to stop traffickers in transit. One of those conditions should be video cameras on coaches. Law enforcement should then spot check to ensure the cameras are running.
19. Interpol and Europol should set up a "modern slavery crime best practice" hub for European law enforcement to regularly share innovative anti-slavery techniques which have evidence of success.

Destination countries

20. There should be a yearly focus by G6 members specifically discussing the issue of modern slavery crime.
21. Law enforcement should annually report the number of Joint Investigation Teams signed with other countries to respective Interior Ministries. National governments and policy makers should maintain a proactive awareness of every Joint Investigation Team currently relevant to their country.
22. In the UK, trafficking offences should be included in Recorded Crime Statistics.
23. There should be Europe-wide awareness campaigns funded by the European Commission and in conjunction with national governments. They should focus on websites and advertising that may be luring people into modern slavery. The campaign should be aimed at victims when applying for jobs or responding to any advertisements, but should also be aimed at consumers to educate them to question what might be behind their purchases.

24. Each force should have a Victim Recorded Interview (VRI) officer or, if this is not feasible a VRI Specific Point of Contact (SPOC) for the unit dealing with trafficking. National governments should encourage them to build on the research from Cambridge University (included in this report).
25. In the UK, the Gangmasters Licensing Authority should change its name to the Labour Exploitation Unit to avoid confusion about its role. It should have its remit expanded and given a cash boost to pay for evidence gathering on the extent of labour exploitation.
26. National governments in the EU should review which bodies are responsible for investigating labour exploitation to assess if they are equipped and trained in modern slavery crime and organised crime more generally.

chapter three

Prosecution rates

Prosecution rates for trafficking offences across Europe remain too low. In previous chapters we have looked at some of the reasons for this: lack of proactive investigations, problems with the collection of data to inform decisions and victims hidden in the organised crime that infiltrates immigration.

*'The total number of THB [Trafficking in Human Beings] cases prosecuted in the EU remains small and the number of convictions on THB from 2008–2010 has decreased.'*⁷⁹

Why do we struggle to significantly increase prosecution rates? One European Police Chief, interviewed as part of the research, explained:

'I think it is about attitudes within the police. If the police in my country were able to invest as much financial and human resources into THB as into drug trafficking for example, the system would work better. I do not believe it is more complicated than that. Drugs ruin young people so they are the priority but then trafficking can be more damaging so it should also be a focus. The problem is attitudes.'

In the final chapter, we go beyond police culture and the organised crime behind modern slavery to look at how prosecution rates could be increased through practical means that can be implemented without the need for legislation. We argue that this requires:

- better use of intelligence within the EU;
- helping victims through the criminal justice system; and
- encouraging law enforcement to work more multilaterally.

All of this would go some way to improving police attitudes by showing that investigating and prosecuting modern slavery cases need not be too difficult.

⁷⁹ Eurojust, *Strategic Project on Eurojust's action against trafficking in human beings*, October 2012, p8 [accessed via: www.eurojust.europa.eu/doclibrary/Eurojust-framework/Casework/Eurojust%20action%20against%20trafficking%20in%20human%20beings%20%28October%202012%29/THB-report-2012-10-18-EN.pdf (19.03.15)]

Modern slavery is largely a cross-jurisdiction crime – we need to find creative solutions to overcome international legal challenges.

Improving prosecution rates

*'National structures are not always strong and they are not always prepared to share data. Some countries are very advanced in their approach to THB, especially in terms of evidence gathering. In many cases THB cases are treated elsewhere as studies into prostitution. Once you jail members of an OCG [Organised Crime Group], within one-two weeks they are replaced. The original members only receive five-six years of jail and then restart the business in a more sophisticated way. I think it is also a problem that it is very difficult to prosecute someone for THB so prosecutors tend to do them for something else. Then of course, you do not have accurate data on the extent of THB.'*⁸⁰

European Police Chief in evidence to the CSJ at Europol, September 2014

Eurojust published a 2012 report with a focus on data sharing, multilateral coordination between investigators and obstacles in tackling modern slavery and prosecuting it as a crime.⁸¹ The report put forward a number of reasons underlying the small number of THB investigations and prosecutions at national level. National authorities were asked to list the main problems faced in investigating and prosecuting THB, by ranking at least three of the most important obstacles encountered at national level. They were ranked starting with the most serious:⁸²

1. evidentiary difficulties in modern slavery cases;
2. issues around the identification of modern slavery cases and victims;
3. the complexity of a cross border crime like modern slavery and the multilateral nature of it;
4. a general lack of knowledge and experience in modern slavery cases; and
5. the recovery of criminal assets.

Helping victims to provide testimony

The issue around victim identification was tackled in chapter one of this report, when we looked at what missed opportunities could be identified in tackling the organised crime in immigration. Chapter two looked at the general lack of knowledge and experience amongst law enforcement and other relevant agencies. In this final chapter we focus on testimony evidence and multilateral investigating as a means to prosecuting more modern slavery criminals.

In giving evidence leading to prosecution, many victims fear the authorities and find it hard to be open about their experience for fear of being criminalised. This is why the Modern Slavery Act in the UK includes a clause to ensure victims are not prosecuted for any crime they may

⁸⁰ Off-the-record interview with European Police Chief, conducted at Europol, The Hague, September 2014 (recorded and transcribed for analysis)

⁸¹ See Eurojust, *Strategic Project on Eurojust's action against trafficking in human beings*, October 2012 [accessed via: www.eurojust.europa.eu/doclibrary/Eurojust-framework/Casework/Eurojust%20action%20against%20trafficking%20in%20human%20beings%20%28October%202012%29/THB-report-2012-10-18-EN.pdf (24.03.15)]

⁸² *Ibid*, p8

have been forced to commit as a consequence of their exploitation. Some EU countries have similar legislation and a few others are looking at introducing a form of non-prosecution for victims. As recommended earlier, other EU countries should bring all modern slavery offences into one piece of legislation for clarity. This point was also made by Non-Governmental Organisations (NGOs) during this research, with some pointing out that changes to legislation in their country have made the landscape more confusing.

Victims are often intimidated by their trafficker or controller: for example, threats will be made to the victim and their family. We established earlier in this report that many OCGs traffic victims from their own country. This makes it easy to target their families who are still at home with violent threats should someone give evidence to the police. Threats can include violence and the kidnapping of family members in order to silence and further entrap victims. This hampers the availability of oral evidence from victims, making it hard to achieve a successful prosecution.⁸³

In other cases, some victims do not recognise that they have been exploited; they might have a complicated relationship with their trafficker – a version of ‘Stockholm Syndrome’. But in some instances they are just so vulnerable that they think their existence is the norm and are therefore unaware of their exploitative status.

In attempting to overcome these problems, it is first of all vital that victims are carefully and compassionately managed and supported when they are first discovered. We know that unreliable victim testimony weakens the ability of prosecutors to use reliable oral evidence, so there is an imperative on first responders and law enforcement to set the right tone for any upcoming prosecution by ensuring the right kind of care at the start.

From the perspective of law enforcement gathering evidence from victims, language barriers and difficulty understanding the nature of the victims’ environment and mental state can act as a barrier:

Victims of human trafficking are often seen as unreliable by the authorities because, as police explained during this research, they can work on a case for over a year and at the last minute a victim – for whatever reason – may decide to withdraw from providing oral evidence. If victim care is carefully managed then this can be overcome. In the meantime, it should be noted that the victim is not always the sole source of evidence. The investigator should seek out other victims and corroborating evidence separate to the victim, requiring deep digging.⁸⁴

Aborted investigations on the basis of testimony being withdrawn or changed to become weaker concerns senior police when they are working through their budgets. It was explained during the face-to-face interviews carried out for this research that resources for trafficking investigations may be restricted for this very reason. Police chiefs question investing in an investigation that has no guarantee of a prosecution at the end of the process.

83 Evidence given to the CSJ from interviews at Europol, interviews with UK police and an interview with a victim of trafficking

84 Evidence provided privately to the CSJ

*'I would say that the main challenge to prosecution is due to legislation on trafficking that exists in my country. We have many prosecutions for violence and abduction and crimes like that but to prove trafficking is extremely hard. People are being sentenced for crimes related to their trafficking but not the actual trafficking so the numbers don't reflect the reality. It is expensive to prove trafficking. If you have a choice between making a clear case and finding someone guilty or risking the case by prosecutors for trafficking, it is an easy decision.'*⁸⁵

European Police Chief in evidence to the CSJ at Europol, September 2014

As mentioned earlier, informing victims that they will not face prosecution for any crime they have committed as a result of their exploitation is critical. So too, however, is helping the victim trust and relax with police in an interview or debrief situation. For this, investigators need training.

Pascale Reinke-Schreiber, a Ph.D. student at Cambridge University's Institute of Criminology, has started to analyse the methods behind Achieving Best Evidence (ABE) interviews with victims of modern slavery. Constructive ABE interviews could lead to more prosecutions if they can produce reliable, relevant and rich information about the OCGs and individuals involved in trafficking and exploitation. At the very least, they can paint an intelligence picture of the people and networks behind the trafficking and exploitation.

Interviewing victims of human trafficking as witnesses, by Pascale Reinke-Schreiber⁸⁶

'A woman would come in and say [...] when I got here, I got gang-raped by the people who took me over, I got raped by the people I was sold to, I was then made to have sex with 20 people a day. And then the officer says 'I see you've got a false passport here' and focuses on the passport. It's incredible. How can you do that? But it's happening in all countries around the world and the traffickers are laughing at us because we are playing into their hands. We've got to focus on the traffickers. To do that we've got to look after the victims [...].'

Detective Inspector Steve Wilkinson in 'Affected for Life' a film produced by the United Nations Office on Drugs and Crime (UNODC) about the global phenomenon of human trafficking

The criminal justice system has to look after victims of human trafficking, especially when they give testimony about their victimisation in order to prosecute traffickers. As part of a human trafficking investigation, victims of human trafficking are often the most important as well as sometimes the only evidence. They are therefore very valuable witnesses. However, the exploitation experienced and the impact that this potentially has on victims can influence the victims' ability as well as their willingness to provide their witness testimony to law enforcement agencies. Victims might experience physical as well as psychological symptoms that can directly influence their ability to give testimony as a witness. Such symptoms include for instance post traumatic stress disorder accompanied by flashbacks, difficulties concentrating, depression, self-blame, headaches and feelings of disempowerment. Furthermore, survivors of human trafficking might not trust the police due to corruption in their home country as

85 Off-the-record interview with European Police Chief, conducted at Europol, The Hague, September 2014 (recorded and transcribed for analysis)

86 More detailed analyses can be found in Pascale Reinke-Schreiber's doctoral dissertation. Contact details: Pascale Reinke-Schreiber, Institute of Criminology, University of Cambridge, Sidgwick Avenue, CB3 9DA Cambridge, email: pr342@cam.ac.uk, phone: 01223 335360

well as threats by their traffickers that the police might not help the victim but rather work together with the traffickers. Interviewers therefore have to establish a trusting relationship with the witnesses and explain to them that they will listen to their experience without judgement.

As one interviewer in my study emphasised:

'The reason why we are asking these questions is to show the people who don't live in the world you live in what is happening to you and why you stayed because people in this country don't often understand that you can be controlled by fear. [...] So we are trying to explain to those people why you stayed in that situation because in this country you would go to the police and the police would help you.'

In the UK, particular interviewing guidelines exist to support witnesses in giving evidence. The Achieving Best Evidence (ABE) guidelines ensure that vulnerable and intimidated witnesses such as survivors of human trafficking are interviewed in an appropriate as well as sensitive way. The interview comprises the following four phases: rapport building, initiation of a free recall, questioning, and closure.

The guidelines are based on universally recognised good practices. The best practice approach rests on an extensive amount of international research. In general, it is agreed that the witness holds the information as the interviewing officer was not present during the incident and the witness should therefore be reminded of this and should be encouraged to report as much information as possible in as much detail as possible without interruption by the interviewer. Furthermore, the importance of a pre-substantive phase, where roles and ground rules can be explained as well as rapport can be built, is acknowledged. Open invitations and questions are given priority over closed questions. At the same time, suggestive and multiple questions should be avoided by the interviewer.

In order to address the question of whether investigative interviews conducted with victims of human trafficking follow the recommendations outlined in the ABE guidelines, 30 video recorded interviews conducted between 2010–13 by officers of a police unit specialised on human trafficking were evaluated using a comprehensive coding scheme. The interviewed victims were primarily female (90 per cent) and on average 25.8 years of age. 40 per cent of interviews investigated cases of sexual exploitation, 30 per cent domestic servitude and 13.3 per cent forced labour.

Overall, the interviews with victims of human trafficking were conducted in a very professional and appropriate way. Interviewers took great care to cover technicalities of the interview such as information of the interview date, introductions of the persons present and the location of the interview. Furthermore, the interviewers explained the ground rules of the interview such as the availability of breaks, the option to state that the witness does not know the answer or does not understand a question as well as the possibility to show the video as the witness' evidence-in-chief in court very well. The majority of interviewers tested the understanding of truth and lies with the witnesses although the guidelines only require this with child witnesses. However, most interviewers did not build rapport with the witness on the video by discussing neutral topics before beginning the interview.

Regarding the substantive interview phase, which is the stage of the interview when the interviewer has given all required information and explanations and proceeds to the allegations in question, findings were also positive. Impressively, all interviewers initiated a first free recall during their interviews, giving the witness the opportunity to provide an uninterrupted narrative of what had happened. This is in contrast with previous research, which documented and criticised particularly the lack of invitations during interviews. The following excerpts give good examples of invitations throughout the interviews:

"Can you tell me in as much detail as possible what has happened to you, what brought you to being with us today";

"Tell me exactly what happened there";

"Tell me everything you can remember about that conversation".

Furthermore, it was apparent that interviewers only rarely posed suggestive or multiple questions that ought to be avoided in order not to influence the victim in their answers. Most importantly, supportive comments were present throughout most interviews. These supportive comments signal empathy from the interviewer and are essential in making the victim feel supported throughout the interview. A supportive environment can be established on the one hand during pre-interview meetings, on the other hand during the interview by means of the interviewer's demonstration of empathy through supportive comments such as the following examples:

"I know this must be very upsetting for you";

"Nobody is here to judge you. We're just here to hear your side of the story";

"Thank you so much. I know it's been difficult".

An additional challenge in interviewing victims of human trafficking is certainly the communication through an interpreter because of the communication through a third party. Furthermore, interpreters have to translate the accounts of severe victimisation, which can be challenging in itself.

In conclusion, research in this area will enable researchers and police officers to improve investigative interviews with vulnerable victims and create an interview atmosphere, which encourages victims to reveal and report their victimisation. Furthermore, focusing on the traffickers and supporting victims when giving testimony, will in the long run improve the prosecutions of offenders.

Reinke-Schreiber's work could create the basis for training programmes, not just for investigators and law enforcement in general, but also for NGOs who increasingly are taking part, or at the very least observing, interviews with victims. NGOs in the past have had a tricky relationship with law enforcement. Police have not always been very good at recognising the importance of NGOs in modern slavery cases while NGOs, keen to advocate for victims, have been wary of law enforcement. This dynamic has started to shift as the importance of the victim's health, not to mention the importance of victims in prosecuting perpetrators, has become increasingly paramount.

The importance of a victim-centred approach was reiterated to the CSJ by the UK Anti-Slavery Commissioner, Kevin Hyland:

"The academic research conducted by Cambridge University highlights the value of developing a victim centred approach. Pascale Reinke-Schreiber has shown that a consistently professional response that focuses on the needs of a victim will by default achieve best evidence and significantly improve the intelligence available to investigators.

The research examined a large number of police interviews involving victims from many different backgrounds and countries of origin. This sufficiently proves that the conduct of

the interview is the most significant factor and where the ABE model is utilised, positive outcomes are more likely to be achieved regardless of the type of exploitation or cultural background of a victim.

'This provides a sound basis to conclude this type of evidence gathering is transferable and should be adopted in other countries as it is highly likely to achieve the same levels of benefit as those identified during this extensive academic research.'

Case study: European Communities Against Trafficking (ECAT) toolkit

The European Commission recently funded a two-year project called ECAT, to raise awareness and tackle trafficking across Europe. It was run in partnership with the Metropolitan Police Anti-Trafficking Unit, Rahab, STOP THE TRAFFIK, Borgorete, Caritas Lithuania and is supported by the Royal Borough of Kensington and Chelsea, City of Westminster, the London Mayor's Office for Policing and Crime and the Institution of the Ombudsperson for Children in Lithuania. When the project ended in December 2014, a toolkit was developed so that other countries could use the ECAT model. The toolkit covers topics including collaboration with NGOs, victim identification and support, and raising awareness, and provides practical materials including real examples of the forms, training and adverts used.⁸⁷

Improved working between Non-Governmental Organisations (NGOs) and law enforcement

NGOs have a very important role to play in the fight against modern slavery. They are often the first people to come into contact with a victim of modern slavery and this means they are often the first people to hear a victim's story. This presents NGOs with a balance to strike: do they keep that story to themselves to protect victims, or do they share it with police in the hope that police will investigate the perpetrators. For this reason, police and NGOs need to communicate and trust one another more consistently.

As part of this research, NGOs and police chiefs from the same countries in Europe were asked about their respective relationships. This was done to compare stories and impressions between the two within respective countries, but also to probe how these relationships varied in countries across Europe. We wanted to know if both groups agreed on the quality of their relationship, as it has consequences for how the victim judges his or her experience of the criminal justice system which in turn has an impact on any oral evidence a victim might feel able to provide.

*'[NGOs] can be useful when we are interrogating and debriefing victims and we can be quite dependent on them ... I mean, obviously there can be goal conflicts, I can imagine but I am not really aware of that. We are more focused on the outcomes of the investigation and NGOs can be more preoccupied with the victim and their family. I can see the general risk but I do not think it is a massive problem.'*⁸⁸

European Police Chief in evidence to the CSJ at Europol, September 2014

87 More about ECAT can be found here: www.rbkc.gov.uk/communityandlocalife/againsthumantrafficking.aspx

88 Off-the-record interview with European Police Chief, Europol, The Hague, September 2014 (recorded and transcribed for analysis)

It is absolutely key for their professional relationship to work, yet it can sometimes resemble a bad marriage: two people suspicious of each other and with differing views of what is best for the children. In the case of modern slavery, NGOs and law enforcement more often than not understand they need to work closely, and in the main it appears that it works reasonably well, but tensions exist. This is to be expected given that they have different objectives. They are different beasts.

'In general, we are unable to get positive outcomes with NGOs as they always feel that more needs to be done. In my country we have established a mechanism within the National Police Directory where all victim care work is coordinated with NGOs and church communities. This can be quite tricky but in a way the system does work. It does create a helpful common ground and a forum for discussion. NGOs in my country are reaching the point where they understand how difficult it is to prove a case of THB. This has not actually changed their attitude but they are beginning to understand.'

European Police Chief in evidence to the CSJ, Europol, September 2014

There is often short-sightedness on both sides in terms of how much they could be of assistance to each other and the victim throughout the process; from identification of a victim to the prosecution of a defendant. One UK-based barrister complained:

'During one trial, Liberty advised my victim not to disclose documents which if I hadn't made a court request to order the documents to be served, the case would have completely collapsed which would have resulted in four defendants walking free. And when I spoke to the victim and explained what it meant, she was more than happy to hand over the documents. She has been misled by Liberty as to the impact of it.'

Understanding the role that each can play as a means of increasing collaborative work could lead to an increase in prosecution rates. For a start, NGOs could better judge what should and should not be shared with police. In other words, they should revisit the balance between withholding information to protect the victim and providing more information to allow police a greater advantage over perpetrators. On the police side, better and more training on utilising NGOs in dealing with victims and throughout an investigation could improve the dialogue between both sides. It comes down to a matter of trust. Moreover, a productive partnership could lead to more reliable oral evidence, leading to a greater chance of prosecution helping to increase rates of prosecution from the low level at which they are now.

During this research, there was a definite acknowledgement amongst law enforcement that modern slavery in particular, is a crime better investigated with the help of outside agencies. Depending on the country or region, relationships between the two vary. One police chief told us that:

'Some police forces just have a different attitude to NGOs so we just need to share our good experiences with them but this is an ongoing process.'

Another explained that:

'Wherever a crime is committed belongs to that area of jurisdiction because our jurisdiction is devolved. The specific area of my country really affects the relationship that the local police have with NGOs.'

So, while there are different levels of engagement at an international level, the same can be said of national, regional and local depending on the country.

Case study: Austria

View from Austrian police

Once police have identified a victim and brought them to safety, they will be passed over to NGOs with whom the police in Austria work extremely closely and effectively. If the victims identified are children, the Austrian police have contact points in each country of origin so that the process can be joined up. Austria also has close connections to NGOs in countries of origin and if children are to be returned they will go to the NGOs rather than to their families. In some instances, historically, when children were passed back to their families, they would only be at home for two to three weeks before they were re-entered into THB.

We are also linked up to NGOs who have rapid response lines that are open 24/7. These NGOs do share information with the Austrian police relatively quickly and effectively. We have officers who patrol streets to make contact with sex workers to ensure that they are not isolated and have a good awareness of the options that are available to them.

Austrian police and NGOs have an informal understanding. Some are more accepted by the government than others.

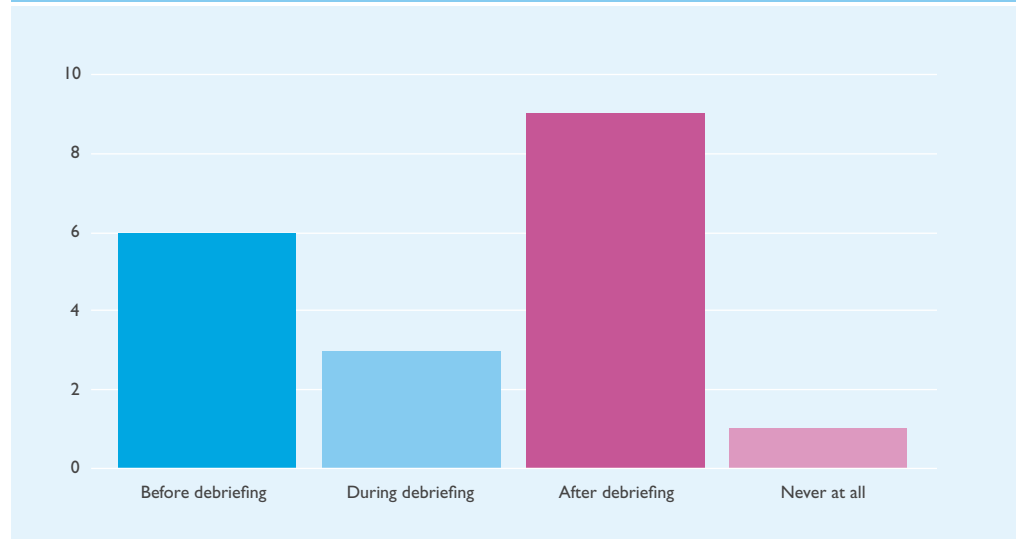
View from an NGO – ECPAT Austria

ECPAT doesn't provide direct assistance to victims and so can't comment on that side of things but in terms of providing training and advocacy they have a good relationship with the Austrian police. They regularly cooperate with national investigation bodies and when police are organising training within their forces, ECPAT and other NGOs often get invited.

ECPAT runs multi-stakeholder training to bring together all NGOs and government bodies working on trafficking. Their view is that the specialised unit in police is really good. They understand victim protection and are good at referring to shelters. However, one complaint was the continued problem of victim identification. It is the view of ECPAT that thousands of police are still not able to identify the signs of trafficking.

Results from our paper survey of European law enforcement show that law enforcement will often use NGOs at different stages. The point at which they speak to NGOs varies – over half spoke with NGOs after debriefing, around a third before debriefing, and just three countries engaged NGOs during the briefing. None of the countries used NGOs from start to finish. The motivation behind who followed what model is not included in this research.

Figure 3.1: When a victim is identified, we (police) speak to NGOs...



Source: EU paper survey compiled by the CSJ and distributed by Europol, August 2014

Despite these issues, progress is being made within the European Union in improving cooperation between law enforcement and NGOs. For the purpose of this research, a number of NGOs in Europe were interviewed by telephone. Generally speaking the NGOs we spoke to are reasonably happy with their interaction with law enforcement in their respective European countries. Some report that because there have been a number of changes to legislation in the area of modern slavery in their country, they face problems in understanding that legislation. This is significant and needs to be rectified immediately. There is no point in improving legislation if NGOs, or other key players, do not know how to interpret it. Nevertheless we heard that there has been a steady improvement in the quality of engagement and the specialised mechanisms that have been put in place, like reporting mechanisms and special units, which are thought to be working well within NGOs and law enforcement.

Notably, one European NGO based in Switzerland revealed how better cooperation between police and NGOs has resulted in more victims being willing to testify. This is precisely the outcome every country in Europe should be working towards.

There is also a lot of new activity going on in Spain in relation to the NGO and law enforcement relationship and how it is practically applied. Most of the victims of modern slavery come from third world areas like Nigeria and Latin America, others from within the EU come from Romania. El Proyecto Esperanza, an NGO based in Spain, explained how it currently works:⁸⁹

- victims can apply for a residency permit if they testify (although it is not always granted). They can also apply for a residency permit based on their personal situation if they do not testify, however, the number of permits granted in this instance is low;

89 Evidence collected by the CSJ during a telephone interview with a European NGO, February 2015

- NGOs contribute to police training;
- psychological and social work support available to victims;
- only law enforcement can officially identify a victim, thereafter a 30-day reflection period ensues to allow for a decision on whether or not to collaborate;
- in interviews with victims, police will usually call NGOs to be present but they are not bound by their input. This mostly happens in Madrid;
- NGOs invited on raids of clubs and other establishments in pursuit of victims;
- in Spain, article 59 of immigration law explains the obligation of police to work with NGOs although it is not as binding as NGOs would like;
- good working in Madrid and Barcelona but outside big cities relationships can be patchy (a trend expressed in other countries in Europe).

NGOs and law enforcement increasingly understand the mutual benefit of working closely in modern slavery cases and it would appear that much upstream thought is being put into how to improve relationships further. In seeking to offer a good standard of care to victims, provide the courts with better oral evidence and work towards an increase in prosecution rates, it is really important the two work constructively and in concert alongside the victim. By doing so, a victim might find it easier to trust the authorities which will loosen the control exerted by the trafficker. But it will also provide more evidence for future investigations and valuable intelligence on the OCGs responsible for trafficking the vulnerable into modern slavery.

Using multilateral investigations to strengthen evidence gathering

In addition to the need for an effective working partnership between police and NGOs, it is crucial that law enforcement within each European country collaborate whilst working on modern slavery cases. More specifically, there need to be far more multilateral investigations, primarily because OCGs operate out of multiple countries. At present, there is more emphasis on the use of bilateral relationships – which is clearly unsuited to the type of case they are being used for:

Fewer multilateral investigations between countries means that it is impossible to gain an accurate picture of OCGs working out of more than two countries – which many of them are. Moreover, a major inconvenience of bilateral working is that intelligence is said to be lost when each ‘ad hoc’ engagement is over.⁹⁰

Despite clear efforts to increase the number of multilateral investigations, there was a decline in the proportion of multilateral cases between 2012 (12 of 60 registered THB cases) and 2013 (10 of 84 registered THB cases).⁹¹

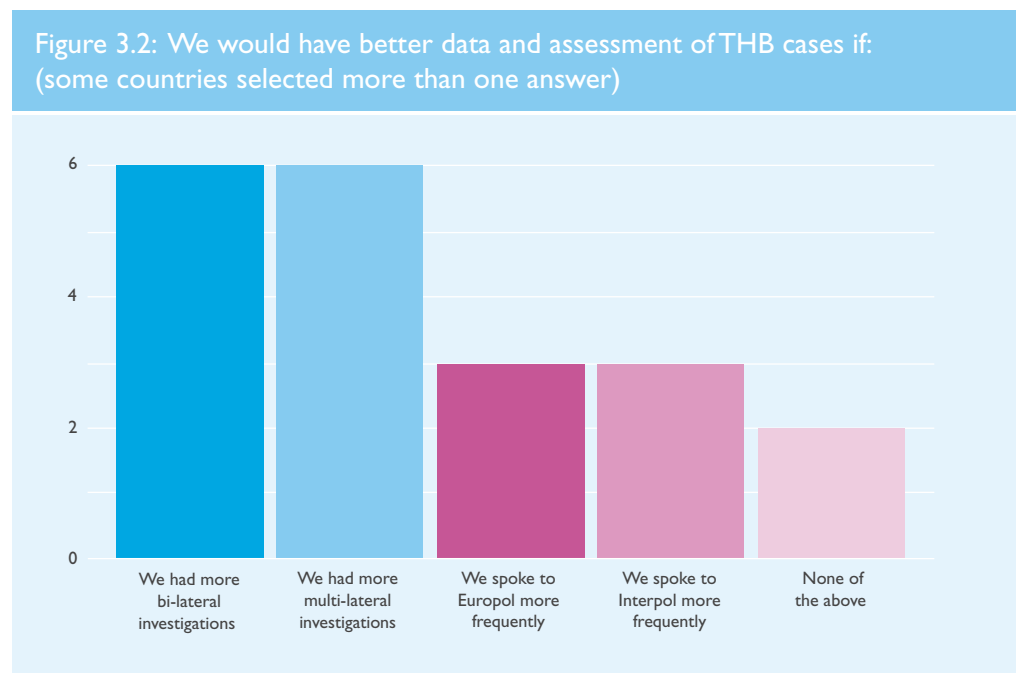
It was explained that one of the reasons for the low number of multilateral investigations is that bilateral networks pre-date Europol, so it is a question of how long it takes for habits to

⁹⁰ Based on an interview at Eurojust, January 2015

⁹¹ Eurojust, *Implementation of the Eurojust Action Plan against THB 2012–2016, Mid-term report*, November 2014, p 11 [accessed via: http://eurojust.europa.eu/doclibrary/Eurojust-framework/Casework/Implementation%20of%20the%20Eurojust%20Action%20Plan%20against%20THB%202012-2016%20-%20Mid-term%20report%20%28November%202014%29/THB-mid-term-report-2015-02-05_EN.pdf (19.03.15)]

change in all countries. Germany and France have extensive bilateral networks but are still lead users of Europol and other multilateral channels. Romania also has an extensive bilateral network belying its source country status, so it can be done with the right cultural attitude within law enforcement.

Interestingly, while there is a tendency towards more bilateral, as opposed to multilateral working, the paper survey of European police conducted for this report shows that in most countries there is a willingness to collaborate. This a positive finding. Though most countries cited “frequently” contacting police in other countries when they identify a victim of modern slavery, they recognised that improved collaboration would improve their data on and assessment of modern slavery. In particular they believed that having more multi- and bi-lateral investigations would be of benefit, over and above increased contact with Europol and Interpol.



Source: EU paper survey compiled by the CSJ and distributed by Europol, August 2014

‘There is a real need to build up some trust in investigations and demonstrate that it is worth sharing information between countries in a quid pro quo fashion. We do request information and data on THB from other countries and often share our own data but we don’t always hear back. We really need to negotiate with other countries in terms of how we go about sharing data as often we give and do not always receive intelligence in return. If we are able to help them in other investigations it is great to be able to give and take. There are some countries that because of their culture they can only take but for us we are able to also give. Sometimes we do not receive responses for data or intelligence requests until weeks after we have asked by which point, sometimes it is too late.’⁹²

European Police Chief in evidence to the CSJ, Europol, September 2014

92 Off-the-record interview with European Police Chief, Europol, The Hague, September 2014 (recorded and transcribed for analysis).

To increase the amount of multilateral working amongst law enforcement there will need to be a cultural shift based on more tried and tested relationship building. Europol is well placed to show examples of what can be achieved by more multilateral working during investigations. But we also need a strong steer from national governments by signalling that policy changes and the development of upstream working relationships, to fix such a complex crime, will not be achieved if we maintain the status quo.

Joint Investigation Teams (JITs) – helping law enforcement make the most of their own networks

In plain terms, a JIT is an agreement that binds police in the countries the OCG is working within and encourages police to think outside their usual force area teams and work internationally. JITs are used by more than one country to investigate and seek to prosecute an OCG for a number of crime types – from counter-terrorism to modern slavery. Importantly for modern slavery crime, it allows police to flow physically and legally across the borders of each country signed up to the investigation. It overcomes the cross-jurisdiction challenges which normally put police off from investigating modern slavery cases more proactively and frequently.

Establishing a JIT to assist an international investigation must become increasingly commonplace as the nature of crime itself thwarts borders and relies on the internet. For any police officer working on an investigation which includes another country, JITs are strategically and operationally beneficial: they provide intelligence, international resources, covert opportunities and unimpeded access to witnesses and victims.

There is increasing awareness within law enforcement about the existence of JITs, but this awareness does not stretch far enough. More training amongst law enforcement would increase awareness about the highly effective mechanism which is readily available. Whilst many current JITs are bilateral, there is an opportunity through JITs to increase multilateral working and what can be achieved through it.

Once it is established that a case involves international elements, any investigating officer should routinely contact Europol. This is not always the case. All international investigations, even those outside the EU, should be referred to Europol as OCGs may operate in other countries in Europe.

At present, some police pursue the use of a Mutual Legal Assistance Treaty (MLAT) between countries, but most agree that the process is too bureaucratic. JITs offer the ability to work more freely as one international team with a common objective: to prosecute members of an OCG and free victims of modern slavery. Eurojust and Europol work in a coordinating role throughout the term of a JIT.

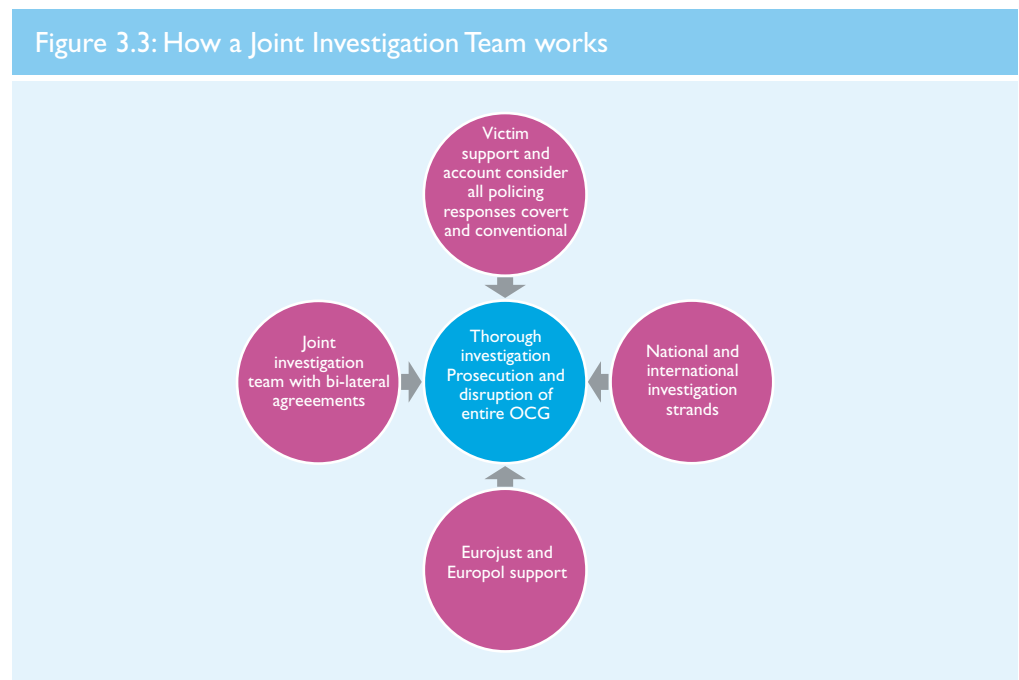
Additionally, in terms of resources, law enforcement will be interested in the fact that Eurojust will pay for flights and accommodation for two representatives from respective signed-up countries during the course of a joint investigation.

It does not matter whether the investigation is covert, overt or post arrest. JITs include locating proceeds of crime, witnesses, using overseas intercept, the execution of European Arrest Warrants or any other investigative task. All that is required is the ability to demonstrate the benefit of a partnership and that there is a serious, complex or organised crime issue across at least two countries. It needs to be proved that the case will be better served by a JIT as opposed to any other form of international arrangement.

The benefits of a JIT include:

- creating a trusting relationship and co-ordinated effort;
- immediate exchange of evidence and intelligence;
- the ability to use otherwise non-evidential material;
- availability of international resources;
- reduced bureaucracy;
- better identification of victims;
- potential funding;
- jurisdiction of prosecution variable;
- targeting entire OCG, not just one small section in one country or region; and
- increase Proceeds of Crime Act (POCA) opportunities.

(It should be noted, however, that even a JIT has limits. There may be some instances in which intelligence sources or the intelligence itself cannot be shared. For example, the existence of a UK intercept generally cannot be disclosed to overseas authorities, whereas overseas intercept can be used as evidence in a UK court of law for prosecution.)



Joint Investigation Teams and modern slavery crime

The number of JITs requested by law enforcement can be used as a soft indicator of how law enforcement prioritise modern slavery crime. At present, JITs are being underused for this complex, cross-border crime. As things stand, there is a disparity in the number of JITs requested to investigate modern slavery cases when we compare it to other organised crime types.

We can look at numbers for comparison because Eurojust created a Case Management System (CMS) in 2004. It allows national desks working out of The Hague to track the number of referrals they receive for whatever type of criminal case. Normally by the time these referrals reach Eurojust there is a problem with the cross-jurisdiction nature of that criminal case and Eurojust can solve conflicts of jurisdiction through use of JITs, coordination meetings or by facilitating and expediting the execution of MLAT requests.

In 2012 Eurojust carried out a project looking specifically at modern slavery cases. This culminated in an *Action plan against trafficking in human beings*. The research behind the action plan showed quite clearly the disparity between modern slavery cases and other forms of organised crime:

*'The total number of THB cases registered in the Eurojust Case Management System (CMS) has been and continues to be low. Since the creation of the CMS in 2004 until the end of 2011, out of 8251 cases registered at Eurojust, only 470 were THB cases, representing only 5.6% of the total number of cases registered at Eurojust.'*⁹³

The 2012 research also shone a light on the proportion of multilateral and bilateral cases for modern slavery. It concluded that modern slavery cases involving origin, transit and destination countries were 'complex multilateral cases'. It went on to state that 'to disrupt the whole "trafficking chain", the involvement of several countries is essential'.⁹⁴

Eurojust research also showed that only 34 per cent of the cases they analysed were multilateral, compared to 66 per cent being bilateral.

The action plan covers the period 2012–2016. A mid-term report looking at the implementation of the plan was published in January of this year which took stock of progress so far. The conclusion was that the number of modern slavery cases registered increased and the number of multilateral cases compared to the total number of modern slavery cases registered also increased. This sounds like good news. However, the report goes on to say that their target to increase the number of multilateral investigations was not met and significantly with 'just 20% of multilateral cases in 2012 and even fewer ... in 2013 with 11.9%', quite clearly there is still some way to go.⁹⁵

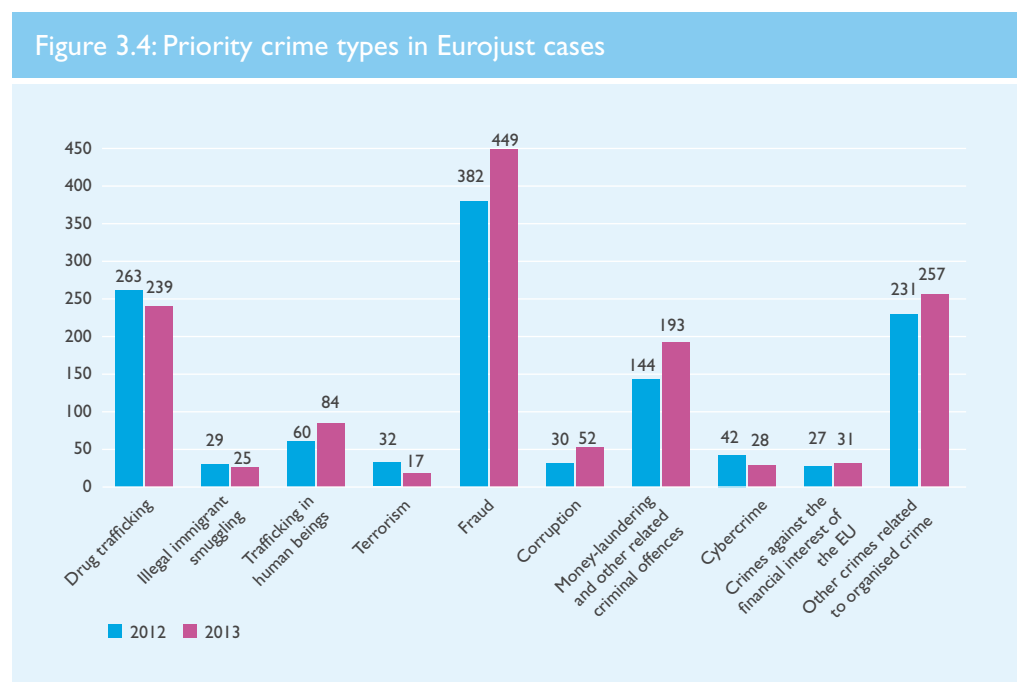
93 Eurojust, *Strategic Project on Eurojust's action against trafficking in human beings*, October 2012, p2 [accessed via: www.eurojust.europa.eu/doclibrary/Eurojust-framework/Casework/Eurojust%20action%20against%20trafficking%20in%20human%20beings%20%28October%202012%29/THB-report-2012-10-18-EN.pdf (19.03.15)]

94 Ibid, p5

95 Eurojust, *Implementation of the Eurojust Action Plan against THB 2012–2016, Mid-term report*, November 2014, p11 [accessed via: http://eurojust.europa.eu/doclibrary/Eurojust-framework/Casework/Implementation%20of%20the%20Eurojust%20Action%20Plan%20against%20THB%202012-2016%20-%20Mid-term%20report%20%28November%202014%29/THB-mid-term-report-2015-02-05_EN.pdf (19.03.15)]

Frustratingly, the number of modern slavery cases being registered still lags behind other crime types. During the reporting period, a total of 3,109 cases were registered at Eurojust. Modern Slavery cases totalled a mere 144, representing just 4.6 per cent of all cases.⁹⁶

*'Bilateral and multilateral investigations would be very good as we cannot be everywhere. This could happen through better use of SIENA and more multilateral investigations. We could get much better at sharing information with Europol. We will also have to convince public bodies across Europe that it is in their interests to share data around and compare the intelligence picture across Europe. Each country would have to ensure they were assessing the situation case-by-case to ensure that victims get the best possible outcomes.'*⁹⁷



(Implementation of the Eurojust Action Plan against THB 2012–2016, January 2015, p10)

Apart from increasing prosecution rates, the other reason that JITs and multilateral working is vital to modern slavery investigations, as well as the issue as a whole, is intelligence. Intelligence is more readily found and shared within a multilateral and JIT framework. Finding a place to hold onto that intelligence for future use and for analysis is important in disrupting modern slavery OCGs. Without better intelligence and analysis, modern slavery crime will continue to be tackled in an ad hoc manner, tinkering around the edges. Good intelligence and analysis underpins upstream policy development and investigation.

96 Ibid, p9

97 From face-to-face interview conducted at the Hague, September 2014

Intelligence sharing and analysis

In terms of sharing intelligence for evidence and analysis, there is an international tool available to police. It is known as the Secure Information Exchange Network Application (SIENA) and works out of Europol. Law enforcement across the EU could and should make much better use of this intelligence resource than is currently the case.

SIENA is Europol's intelligence gathering mechanism connecting all law enforcement agencies to Europol and to each other. It receives intelligence from national police and it provides intelligence and analysis of intelligence through a secure network in return. It is used for all areas of Europol's business, from drug trafficking to counter-terrorism.

The Metropolitan Police is unique amongst its EU colleagues in that it has a SIENA system actually set up on site. Proximity to it encourages police to use it more frequently. However, most countries use SIENA at a national law enforcement level which means regional or local police must ask for information through national structures. This is more time consuming and less reliable than forces simply having it at their immediate disposal. It also belies the lack of knowledge and joined up thinking about modern slavery crime at varying levels of policing. Local police are just as important as national police in connecting with other police internationally given the complex nature of modern slavery.

Training in the use of SIENA is provided by Europol and the set up costs are small, so there is little resource implication for law enforcement. In fact, it could be argued that it would help police save money if they had better access to international intelligence and analysis than they do now as it would lead to more intelligence led investigations (which are more targeted and likely to succeed as a result). It is also possible to use SIENA alongside existing technology and national data can be easily transferred to SIENA creating an interface between the two.

Table 3.1: Cases initiated in Europol's Secure Information Exchange Network Application (SIENA)⁹⁸

Year	THB Cases	All cases
2014	1,591	34,472
2013	1,099	18,310
2012	1,116	15,949
2011	822	13,697
2010	587	11,738

Research for this report suggested that all police see the benefit of SIENA as an intelligence tool, especially for a complex crime like modern slavery.⁹⁹ Some admitted that they do not make the most of its potential, others complained about the fact that information needs to be translated into English. The quality of intelligence also relies on the frequency and quality of the information submitted by law enforcement. The more they put in leads to a direct improvement in the quality of the intelligence and analysis they take out.

⁹⁸ Data provided privately to the CSJ by Europol

⁹⁹ Face-to-face interviews carried out at Europol, The Hague, September 2014

While Europol's business is mainly conducted through investigations, Interpol, based in Lyon, is used by law enforcement as a way of sharing intelligence and analytics on organised crime. Interpol publish their 'red routes' document which covers modern slavery crime. Police are also employed there to look at the issue. However, they have not been terribly proactive in highlighting modern slavery as a crime. Speaking to one former police officer who worked at Interpol who did not wish to be named, it was said that Interpol lacks vision. He went on to explain that in France they have a sign at level crossings to highlight that one train can hide another. He said that for him, trafficking was the same: *'police can't see the second train because they are only looking at the first'*. In other words, Interpol is not looking at the modern slavery crime which is being obscured by what is established as a 'higher priority' crime. A new Director-General has been appointed and it is hoped that he will provide a greater focus on the issue of modern slavery as a form of organised crime and enhance Interpol's response to it accordingly.

In conclusion, progress is being made in some areas but there is still a mountain to climb in terms of increasing modern slavery investigations and prosecution rates. Better use of multilateral working between European law enforcement, establishing more JITs, exchanging more data and intelligence using the available tools like SIENA, must be seen as priorities. Governments will continue to pass legislation, policy makers in Europe will continue having meetings to talk about the seriousness of the issue and there may well be some progress from those actions, but without a strategic operational response between law enforcement, it will simply fail.

Chapter Three Recommendations

27. Law enforcement should be drawing on the same techniques used in other aspects of organised crime when investigating modern slavery cases.
28. There should be a dedicated list of police officers and a single point of contact within every European police force available for all who investigate modern slavery to facilitate swift handling of intelligence.
29. Interpol needs to become more involved with law enforcement in the fight against modern slavery. They need to provide more intelligence analysis to help police better track Organised Crime Groups.
30. Member states should diligently provide data on modern slavery required by EUROSTAT and be named-and-shamed when they don't.
31. National governments should roll out more witness protection programmes across Europe to mitigate the problem of victims being too scared to give evidence.
32. As part of bringing forward a Modern Slavery Act, countries of the EU should establish an Anti-Slavery Commissioner, with 28 Anti-Slavery Commissioners meeting annually to share best practice, information and data. The Commissioners would then take on responsibility for holding law enforcement and government to account. They could also have responsibility for:

33. Training courses for investigators and prosecutors in interviewing victims of modern slavery. This will ensure that authorities get more reliable victim testimony, helping towards more prosecutions. It will have the added benefit of providing law enforcement with more evidence and intelligence for future investigations.
34. National governments should publish victim interview guidance literature for law enforcement.
35. Non-Governmental Organisations should be present when a victim first comes into contact with law enforcement, and continue to be so through to prosecution. This will ensure that victims who are suspicious of authorities feel supported by an independent organisation.
36. There should be an accreditation system for Non-Governmental Organisations to demonstrate that they meet certain criteria for victim case work and cooperation with European law enforcement. This would build trust to facilitate information sharing between police and Non-Governmental Organisations. It is also right that victims have access to the best standard of care.
37. European law enforcement and Non-Governmental Organisations should establish a formal working framework. Roles should be clearly defined within the framework. One way of achieving this could be through a Memorandum of Understanding (MoU).
38. European law enforcement should consider a multilateral investigation in the first instance, unless there are only two countries relevant to that investigation.
39. Secure Information Exchange Network Application should be set up and used at all levels of law enforcement to include regional and local police. This will encourage police, by its proximity, to add more information into the system, improving the quality of intelligence and information that comes out.
40. There must be a concerted effort to raise awareness of Joint Investigation Teams among European law enforcement in order to increase international cooperation and the number of multilateral investigations, leading to an increase in prosecution rates, closing the intelligence gap and encouraging more police to work (at ease) with international counterparts – making European law enforcement a more joined-up community.

Conclusion

Modern slavery crime must end. Victims are hidden away from the public eye and they have no voice. Under the tight control of a slave driver, victims are unable to tell anyone of their enslavement and the repeated violence and rape that is so often a feature of it. So we must be their voice. Wider society must shout from the roof tops that modern slavery is wrong and it won't be tolerated any longer.

As this report has demonstrated, some progress is being made across the European Union and as an issue modern slavery is attracting the attention of national governments. But pace is too slow. Interior Ministers need to send out a very strong message that modern slavery is propped up by Organised Crime Groups and law enforcement should in turn investigate it with every available resource. It is good that governments and the European Commission have created working groups and inter-ministerial groups, but policy development needs operational input. Law enforcement must be vocal about what it needs by way of legislation and policy from respective governments.

Modern slavery is a high harm, high threat crime. Its international reach requires police to work more closely with police in other countries. As the report sets out, police at all levels need training in identifying more victims, but they also need training in how to interact at an international level. Our borders in the EU are less defined and the internet provides opportunities for criminals to network all over the world so the future of policing needs to adapt and become more adept at communicating beyond their own patch. Law enforcement has to become more inquisitive about the tools available to them – the patchy use of SIENA as an international intelligence tool is a good case in point.

There are any number of operational, policy, data, intelligence and knowledge gaps yet to fill. We also need to gather more evidence on labour exploitation in certain industries, including maritime modern slavery. There is an imperative on academics and policy makers to take on these themes for future research projects.

From a UK perspective, we can be proud of our Modern Slavery Act. But now is the time for implementation. We must judge success on outcomes like an increase in prosecutions and the number of proactive investigations undertaken by all police forces to find victims and put slave drivers behind bars where they belong. Training is key. We need to train our judges, prosecutors, investigators and juries on how to interpret this new Act, otherwise it will gather dust on statute like so many other pieces of important legislation only to be recycled years

down the line by a new executive. We need to take this Act out of Westminster and explain it to all concerned so we can see its immediate impact.

Modern slavery will not stop if countries work in silos. It will not stop if police, borders and immigration agencies work in silos. Organised Crime Groups are exceptionally good at making the most of their networks; until politicians, police, policy makers and the public do the same we will not stop vulnerable men, women and children being trafficked into enslavement.

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