

# **Modern slavery in the Fenland area**

A scoping report

Gary Craig

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# **Modern slavery in the Fenland area**

## **Executive Summary**

This is a report based on an action-research study carried out between 2018 and 2019 into the scope of modern slavery in the Fenland area of Cambridgeshire, particularly focussing on the area of which Wisbech is the natural demographic centre. It sits alongside a parallel report by a team led by Professor Margaret Greenfields of Buckinghamshire New University on migrant workers in the area.

The study was commissioned from Professor Gary Craig, of the University of Newcastle upon Tyne, national expert, writer and researcher active in the field for almost twenty years, by the Rosmini project, a long-standing community project working with migrant workers in the area. It had become increasingly clear to staff at Rosmini over the past few years that the issue of modern slavery was deeply interwoven into the lives of the migrant population in the area and they therefore sought help both to understand the dynamics of modern slavery in the area and ways of strengthening their response. Statutory organisations active in the area include local authorities, police, fire and rescue, health bodies, the GLAA and HMRC, in differing degrees, depending on the work in question and the issues being addressed.

The study involved a literature review, a scoping exploration of the area, a review and secondary analysis of relevant data, and interviews with 18 key actors (with a further four unavailable or unwilling to be interviewed). Modern slavery has become a prominent issue in the area and nationally in the last five years and this study was therefore a very timely one.

Key issues emerging from the study include the following:

1. Although the importance of partnership working was stressed by many respondents, most NGOs regarded themselves as marginal to and excluded from much of partnership working.
2. Claims made by the government that the Modern Slavery Act was to be regarded as world leading were regarded with scepticism by many respondents, particularly in the context of an austerity programme which undermined much of the work or made funding certain initiatives, particularly in the area of victim support, very difficult.
3. The importance of having publicity and campaign materials in key languages other than English was stressed. Some organisations had embraced this need assiduously, others less so. and publicity was often not coordinated between agencies.
4. The training commissioned from the consultant by the Rosmini project appears to have been effective, with a high level of demand: about 150 people attended one of the four training sessions in Wisbech or Ely and the overall rating was between 4 and 5 on a scale of 1-5. The majority of those attending came from four sectors: local government, police, voluntary sector organisations and housing providers. Particularly noticeable by their absence were representatives of health organisations. However, it is clear that there remains a need for considerable more training to be available, especially for front line staff, many of whom still seem still unaware of the NRM and their responsibilities under the legislation, especially as 'first responders' or as referring agencies. More generally, there still remains within some organisations a lack of understanding of cultural differences, exploitation and modern-day slavery, resulting in a negative attitude and lack of empathy towards some of the issues faced by migrant workers, often leading to inequalities in service delivery.

5. Key positive action which appears to have made a difference in the area has been that initiated through the Community Diversity Forum, chaired by Fenland District Council, which brings together most organisations working with diverse communities. The Forum enables organisations to share information and tackle issues, and has an Action Plan of which all organisations are encouraged to take ownership.
6. Whilst there were several very active NGOs in the area, faith groups, with one or two exceptions, had made a much less significant anti-slavery input. The church of course has a potentially very important role to play as it has parish populations at grassroots level which can be ears and eyes for very local anti-slavery work.
7. Some statutory organisations had modern slavery as part of a wider remit (eg diversity); some had modern slavery as a specialised area of work but within a subgroup or subcommittee (sometimes known as delivery groups) or even a single officer reporting to a body with wider responsibilities (strategic officer-led boards: e.g. children's services or community safety). There were not, however, specialised and well-resourced organisations in the statutory sector with a single focus on modern slavery work. This slightly complex array of organisational approaches may mean that collaboration and coordination was not as effective as it might be.
8. Whilst each organisation encountering potential slavery victims worked to support them individually within their own frame of reference, there was no coordinated victim support strategy across the piece, including a safe house for victims within or near to Wisbech. It is recognised elsewhere in the UK that such strategies need to include provision for individual support, counselling, money advice, housing and benefits support, support for children where appropriate and help into work. This requires both a strategic approach and effective funding.
9. The overwhelming majority of modern slavery cases in the past few years in Fenland have concerned labour exploitation of some kind, often linked to housing exploitation. One respondent noted that sex trafficking was probably more widespread than known about (particularly as small short-term 'pop-up' brothels were difficult to monitor although these tended to appear more in the urban centres of Cambridge and Peterborough, and of course trafficking and labour exploitation might be occurring for some individuals simultaneously) but new forms of modern slavery were emerging and it was important that training and awareness-raising both for paid workers and for the public was kept fully up-to-date.
10. Whilst it is true that most of those identified as being in forms of modern slavery were of non-UK nationality, particularly from East and Central Europe, it is important to stress that some were UK nationals, often people with learning disabilities who had been picked up at homeless hostels, soup kitchens etc and then taken to work in highly exploitative conditions and proactive work might focus on these sites. It was also noted that a few criminal gangmasters had been around for some time and had immersed/hidden themselves within UK culture.
11. The more recent phenomenon of 'county lines' was said to be less prevalent in Fenland because of a lack of a direct train line from Wisbech to major urban centres; however, incidences of county lines were beginning to emerge with young people trafficked by other means of transportation and the issue is growing in significance. Locally there had been a noticeable incidence of cannabis farms and illegal car washes in recent years.

The report also reflects on some of the dimensions of rurality which makes work in rural areas different and, in some ways, more challenging. These include

- The different profile of forms of modern slavery, with a particular emphasis on labour exploitation (and increasingly in ‘county lines’), to be found in rural areas.
- Distances between towns and centres of population, and the sparseness of those populations meaning that anti-slavery responses are likely to be more difficult and more costly.
- Rural logistical issues also impact on organised responses to slavery, including the ability to create sustainable partnerships.
- The general low level of experience of minorities in rural areas and the misrepresentation of their impacts on local life generated by hostile media (responsible for rises in hate crime) mean that public attitudes to the vulnerability of minorities are likely to be mixed at least and downright hostile at worst, making victims of modern slavery less likely to be identified and supported than they might be in more urban settings, and certainly less likely to seek help.
- It is significantly more difficult, even where agencies have the political will (which, as we can see is not always the case) for them to work together in effective partnership. This requires greater levels of investment in time and other resources and agencies have to find creative ways to build strong partnerships which address these kinds of issue.

These, and other dimensions of rurality, suggest that those national fora working on issues of modern slavery should always have a strong element of their working agenda which explicitly raises issues of prime concern to rural areas. These agencies might include for example, the Office of the Ant-Slavery Commissioner, the All-Party Parliamentary Group on Modern Day Slavery, the Human Trafficking Foundation and its various special interest groups, and the Local Government Association. It would also be useful if those agencies training people to work with the public were able specifically to focus on the differences between rural and urban contexts.

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## **1. Background to this report**

This is the report based on an action-research study carried out between 2018 and 2019 into the scope of modern slavery in the Fenland area of Cambridgeshire, particularly focussing on the area of which Wisbech is the natural demographic centre. Wisbech is in the top 20% of areas in the UK by deprivation and is characterised by very large numbers of Houses in Multiple Occupation and a large migrant worker population. Although Wisbech was the central focus of the study, it spilled over into neighbouring areas and indeed counties since modern slavery dynamics are no respecter of local government or police force boundaries; for example, those working in forced labour may live in one area, and be transported to work in another or vice versa and women trafficked to provide sexual services in one area may be moved frequently to stay ahead of the police.

The study was commissioned from Professor Gary Craig, of the University of Newcastle upon Tyne, national expert, writer and researcher active in the field for almost twenty years, by the Rosmini project, a long-standing community project working with migrant workers in the area. It had become increasingly clear to staff at Rosmini over the past few years that the issue of modern slavery was deeply interwoven into the lives of the migrant population in the area and they therefore sought help both to understand the dynamics of modern slavery in the area and ways of strengthening their response. Statutory organisations active in the area include local authorities, police, fire and rescue, health bodies, the GLAA and HMRC, in differing degrees, depending on the work in question and the issues being addressed. The researcher is grateful to all those who participated, particularly Mick and Anita at Rosmini, particularly for their tolerance when the researcher was seriously ill and had to suspend his work for a while. The report sits alongside a parallel report commissioned by Rosmini on the profile of migrants in the area; there is inevitably some overlap between the two reports since the majority of those found to be in modern slavery in the area have been migrants of one kind or another.

## **2. The context**

Wisbech is a medium-size market town in the north of Cambridgeshire, close to the borders with Lincolnshire (to the north west) and Norfolk (to the north east). Wisbech has a strong historical connection with slavery in the person of Thomas Clarkson, former resident of the town, who was one of the key figures working outside parliament to support Wilberforce's parliamentary work in the late 18<sup>th</sup>/early 19<sup>th</sup> century to abolish the Transatlantic slave trade.

The population of Fenland district, of which Wisbech is the major centre, as of the 2011 census was 95,262, of which 6% were 'White Other' (99,150 in 2015, a mid-censal estimate: but see below). Wisbech's EU non-British population at this time was more than 13%. Wisbech's population was about 33,000 in 2016, an (very substantial) increase of 50% since 1981. The number of those economically active was 65% of the total Fenland population compared with a county average of 69% and Fenland has a significant population of retirees. The proportion of those with no qualifications was 31% of the Fenland population compared with a county average of 19% (this significant difference has also to be seen in the context of Cambridgeshire hosting two universities). Of course, whilst students may be vulnerable to rogue landlords this is a relatively minor issue compared with the vulnerability of migrant workers who lack language skills, knowledge of housing legislation or sources of advice, and availability of funding, to support them.

Since the late 17<sup>th</sup> century, when the Fenland area first began to be drained for agricultural purposes, the local economy has been dominated by food production and preparation and this continues to the present day. Historically, labour was recruited through a gangmaster system, where workers were hired annually or seasonally through gangmasters (effectively, labour suppliers) to work for particular farmers and employers. By the beginning of the 21<sup>st</sup> century, despite the introduction of various government schemes such as the seasonal agricultural workers' scheme, which allowed foreign workers, including students taking working holidays, to work through the summer season, it was becoming clear that there was a shortfall of available labour for what was widely seen as dirty, insecure, poorly-paid, and occasionally dangerous work, whether in the fields or in food production plants, a number of which had been established in the area. From that point of view, the enlargement of the EU in, first 2004 and then again in 2008, provided the employers in the area with a golden opportunity for recruiting new, largely unskilled, labour from East and Central Europe, particularly as the UK, along with Ireland and Sweden was one of the few existing 20 EU member states to place virtually no restrictions on the movement of labour into the country.

This had a profound effect on Wisbech and towns like it (such as Boston and Spalding) as unrestricted and unplanned-for numbers of migrant workers arrived in the area generating some unexpected pressures on education, housing and other services. Peterborough also became home for many thousands of migrant workers although in many cases, as with other cities such as Hull, Leeds and Sheffield, these were people often accommodated within the city but working outside it. Central government took no responsibility for managing this inflow (and indeed seriously underestimated the numbers that might be involved) or resourcing local government to cope with it, other than through a workers' registration scheme (WRS) which was terminated a few years later, and the requirement that new workers acquire a National Insurance Number (NINO): some restrictions were placed on access to health care. As austerity policies began to bite within local government, the police and NGOs affecting funding for a number of local migrant integration projects (addressing the

community conflicts which are described elsewhere), it was widely recognised that, as one prominent Sunday newspaper put it in 2018, ‘cuts in projects for migrants (were) fuelling local tensions.’

The relatively huge flow of migrant workers quickly led to a sense of panic and crisis which, coming on the back of a significant increase in refugees arrivals since the late 1990s, was exploited by right-wing anti-immigrant interests and encouraged political parties to take a more and more negative policy position in relation to immigration, leading to today’s virulently ‘hostile environment’<sup>1</sup>, introduced by the current Prime Minister when she was Home Secretary. Towns such as Wisbech and Boston saw anti-immigrant sentiment grow (often based on the slimmest of facts and scurrilous media coverage), with marches and rallies, and by 2018 the town of Wisbech was described by one local Blog as ‘a town in crisis’. This image was generated by national media coverage from tabloid papers, one of which (the Daily Mail) alleged that the town was now ‘terrorised by the Baltic mafia’. The Sun claimed in 2014 that almost twenty percent of the town’s population was of Lithuanian origin, a figure which, whilst wildly exaggerated, was repeated more than once to the researcher. Media coverage tended to ignore positive impacts of migration such as an increase in local spend, foiling many vacant jobs and keeping some smaller schools (threatened with closure) open. More general myths such as ‘they are taking our jobs’, they all claim benefits, they jump the housing queues were all found by serious research to be just that myths. Even major employers’ organisations such as the CBI acknowledged that migrant workers tended to be hard-working and reliable workers.

Whilst these negative media claims were preposterous, devoid of any factual basis and deeply unhelpful in terms of community relations, they did point to one underlying problem which was that by the last few years, amongst the many migrants coming to earn what they regarded as a decent living in legal conditions, there were also a relatively few UK national and foreign people beginning to operate as illegal and criminal gangmasters recruiting labour in foreign countries and within the UK for what turned out to be highly exploitative work, alongside an increasing flow of women trafficked into the country for sexual purposes. (see e.g. ‘The gangsters on England’s doorsteps’: Felicity Lawrence, *Guardian* 11 May 2016). Alongside them, have emerged other labour suppliers which, although operating (sometimes just) within the law, have made the recruitment and use of foreign labour a significant industrial activity, often paying very close to minimum wages and linking employment to housing provision as a bargaining lever to undermine workers’ rights. The conflation of immigration policy, EU migration, and increasing concerns about exploitation, together with the ill-informed anti-immigrant rhetoric of parties such as (but not only) UKIP and the Brexit Party, has led to confused and hostile policy and politics at both national and local level. Austerity also had a direct impact through the cutting back of services designed to regulate the illegal excesses of employers, such as the employment agencies advisory service, and the employment tribunal system.

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<sup>1</sup> This hostile environment generated a number of policy and political errors, not least the appalling treatment of the Windrush Generation of the late 1940s, many of whom had a right to be in the UK but were summarily deported and/or denied their basic rights as UK citizens.

### **3. Types of migrant: a summary of local intelligence**

#### *The Roma*

The Roma populations have some historical, linguistic and cultural links to gypsy and traveller populations but some significant differences, not least that they are sedentary. The Roma of East and Central Europe had been deeply persecuted and discriminated against for many years, including being one of the groups targeted by the Nazis for the 'final solution', i.e. mass extermination. In the late 1980s and 1990s, Roma people began to come to England from the deeply hostile states such as Hungary (where Roma unemployment rates for example were as much as 95% in some eastern areas) to claim asylum but their claims were usually rejected by the government and they were often the subject of violent attacks by racists at England's southern ports.

With the accession of Hungary, Slovakia, the Czech Republic and Poland into the EU in 2004 and that of Bulgaria and Rumania in 2008, the status of these Roma changed as they were now subject to freedom of movement and many came to the UK to seek work and a more conducive living environment. Sadly, this was not always the case and the longstanding hostility to travellers was often extended by local populations to Roma (who were often regarded as part of the same ethnic group). However, by 2010, a number of local projects had been established to support and help integrate the Roma populations in their areas. (Rosmini had also established a small project to support the gypsy and traveller population). The Roma are still not established as a separate group for censal purposes although travellers were identified as a separate group in the 2011 census. This lack of reliable data obviously makes it difficult for organisations to assess and respond to the needs of this group with any precision, and Roma are well-known, as with gypsy and traveller populations, as having difficulty accessing mainstream services effectively. Yet the UK government has refused, despite the requirements of the EU, to put a distinct national Roma strategy in place. A report by the present author for the European Union in 2011 noted that national estimates of the size of the Roma population in the UK varied from 1 Million to 100,000 and a detailed study by Salford University two years later estimated the population at almost 200,000 but noted that this was a 'conservative estimate': this is also equivalent to the total of gypsy/travellers in the UK recorded by the 2011 census, but which has grown over a relatively much shorter period of time. These are both significantly higher than the population of many longer-established minority ethnic groups in the UK. The Roma population in the East of England region was estimated by Salford University to be around 12,500 with Peterborough being one of the larger national centres of Roma population.

#### *Refugees*

From the 1999 UK government refugee dispersal policy framework onwards, only about 500 asylum seekers per year have been dispersed to the East of England region, largely to Peterborough. This compares with the 9,000 or so per year dispersed to the North West and Yorkshire and Humber regions. Peterborough and Cambridge City both have active NGOs working to support refugees and asylum seekers, most recently including those fleeing the civil war in Syria. Cambridge, for example, has offered to house up to 100 Syrian refugees with the support of local campaigning groups and about 50 were housed in 2015-16. Given the very large overall levels of in-migration to the region, it is understandable that there has been a correspondingly low level of policy interest in the issue of refugees. The most recent Migrant and Refugee Strategic Needs Assessment report published in late

2016 by the Cambridgeshire and Peterborough Clinical Commissioning Group thus has only a short appendix describing the situation of refugees and asylum seekers but very limited local data means that the section is dominated by national data and that the needs of refugees as a distinct group (with often a very different ethnic profile) is overlooked.

### *Migrants and migrant workers*

Much of this section draws on the Joint Strategic Needs Assessment (JSNA) report on Migrants and Refugees referred to above and readers are also encouraged to read the detailed report prepared by Professor Greenfields' team, referred to earlier. As noted above, migration has been a continuing feature of the county for some hundreds of years, and despite some attempts at simplification there are still about 12 different legal ways (leave aside smuggling) in which migrants are permitted to enter the UK. Since the turn of the twenty-first century, the focus has been almost entirely on the flow of migrant workers from the EU into the area. (Of course, the two universities and particularly Cambridge University also make a significant contribution to more temporary migration in the form of fee-paying university students from overseas). This section focuses on the unskilled and semi-skilled migrant worker group.

As noted earlier, migration of workers from the EU accelerated rapidly after 2004; it was largely unmanaged, unexpectedly large numerically and generated considerable tensions including violent conflicts in some areas such as Wisbech and Peterborough, often provoked by far right groups but reflecting wider concern that pressure would be put on local services and local identity would be distorted. It was only latterly that government made limited funding available to help support local initiatives to promote integration but by then much of the damage had been done. This unplanned 'invasion', as some commentators called it, is regarded as a major factor in leading to heavy 'leave' votes in the 2016 Brexit referendum in areas around the Wash.

Some data does not distinguish clearly enough between migrants, who may be planning to stay only temporarily, and longer-established minority ethnic group members, and this can often only be unpicked by analysing carefully the ethnic or national origin of some groups. For example, Peterborough has been home to the largest Italian immigrant population in the UK, which came many years ago to work in the local brickyards. This group would now generally be regarded as a settled population, or even integrated in the sense that UK government uses the term. The population of Peterborough, which is a separate unitary authority from Cambridgeshire albeit sharing some services and covered by the same single police force, grew by almost 25% from 2001 to the present to a level exceeding 200,000, earning it the sobriquet of 'Polishborough.' Again, many migrants, particularly in recent years, would be characterised by lower education standards, poor language skills (and thus reliance on those who have better language skills but may not be trustworthy), and low income, generally all leading to increased vulnerability.

One important point to note is the limitations of the census data. For example, many of the Houses of Multiple Occupation (HMOs) are not registered and so the key tenant will not include people living in the house on any paperwork. In addition to that are also huge numbers of single rooms available to rent within households (sometimes extended family members) although many of the rooms for rent are advertised in local shop windows and on facebook profiles). For a number of reasons the key tenant again will not include the room occupants on any official paperwork. Numbers of residents may thus be significantly under-reported and only come to light following official inspections.

The latest JNSA for migrants and refugees in Cambridgeshire shows the demography of the migrant population to be as follows: this provides a demographic context for the discussion of modern slavery in the area which follows:

- Non-UK born residents in the East of England are primarily adults of working age, with 43% aged 20-39 and 71% aged 20-59 years of age. The most common age groups for the non-UK born population of the East of England were 25-29 and 30-34, accounting for 12% and 13% of the non-UK born population respectively.
- Existing migrant populations are highest in Cambridge City, with a non-UK born population of 307.1/1,000 residents (mainly students and those employed in the service sectors). Fenland has an apparently relatively low rate of non-UK born population overall (but see the note about under-reporting above); the unadjusted rate per 1,000 of total population that are estimated to have been born outside of the UK in Fenland is 62.5/1,000, compared to 129.7/1,000 across all of Cambridgeshire.
- The East of England continues to experience relatively high levels of migration in comparison to other areas of the United Kingdom. The percentage increase in migration has been high in Fenland and Peterborough, with rises in non-UK born population in these areas between 2001 and 2011 of 210.8% and 148.2% respectively.
- Cambridge City has the highest rate of national insurance number registrations for non-UK -born nationals across Cambridgeshire, with unadjusted rates of 53.0/1,000 in 2014. Fenland has the second-highest rate, 27.5/1,000. Unadjusted rates of NINO registration among non- UK born population have fallen in Fenland between 2010 and 2014, whereas in Cambridge City they have increased, from 44.0/1,000 in 2010 to 53.0/1,000 in 2014.<sup>2</sup> (Fenland has in general half as many again NINO registrations pro rata as in Cambridgeshire as a whole, with Peterborough also significantly above the Cambridgeshire average albeit lower than Fenland.)
- Cambridge City has a higher rate of long-term migration (defined as migrants settling for a period of 12 months or longer, which would thus include most students) than England and the East of England as well as Peterborough and other districts of Cambridge. In 2013/14, the unadjusted rate of long-term migration in Cambridge City is 32.8/1,000 residents. The rate for England is 9.6/1,000 and for the East of England, 6.9/1,000.
- Data shows that Cambridgeshire has a higher percentage than England of migrants who have been resident in the UK for 5 years or less and conversely a lower percentage of residents who have been in the UK for 10 years or more. Education is a key determining factor in the high rates of migration in Cambridge City, with 31.7% of migrants responding to the 2011 census stating they were in education compared to 17.5% in Cambridgeshire overall, and 12.2% in England. In fact, data from Cambridge University showed that there were just over 8,000 non-UK born students (around 40% of total students) studying in Cambridge in 2015.
- There are discreet areas within Cambridgeshire where Eastern Europeans from A8 countries tend to live and seek employment. It is clear from the school census data that Wisbech in Fenland is a location that attracts Eastern Europeans, particularly people from Lithuania, Poland and Latvia.

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<sup>2</sup> Note that there is no requirement to deregister a NINO when a worker leaves the UK and that therefore this data is slightly suspect in providing accurate estimates of the local migrant worker population. A significant number of migrant workers lose their NINO status when moving from registered work to unregistered and exploitative ('slavery') work. NINO registrations have tended to fall slightly in the last few years across the county.

- In total, 7.4% of the Cambridgeshire population is classified as 'white other' including the Eastern European population. 1.6% of the population of Cambridgeshire has an Eastern European ethnicity (9,659 people out of a total population of 621,210). If ten wards are analysed with the highest proportions of Eastern European residents, five are in the Wisbech area.

Other data derived from the JNSA report of relevance to this report are as follows (as of 2016):

- Fenland District saw a 210% increase in non-UK born population between 2001 and 2011 (from 2,641 to 8,209). If all these were from Latvia, which is far from the case, this would still only represent something like 25% of the total population of Fenland. Many of these are concentrated in a few wards, generally those with older private rented housing which have in many cases been converted into houses of multiple occupation. Concern about the conditions in some of these houses has led to parts of Wisbech being designated for special housing measures ('selective licensing'). Across the UK, migrant workers are three times as likely to be living in private rented accommodation as the population at large.
- Fenland has a comparatively high level of NINO registrations in 2014, 1,630 compared with 4948 in Cambridge City.
  - All districts of Cambridgeshire apart from South Cambridgeshire have a higher percentage than England of migrants who have been resident in the UK for 5 years or less and conversely a lower percentage of residents who have been in the UK for 10 years or more. The percentage of residents that have been in the UK for less than 2 years is highest in Huntingdonshire (18%) and Fenland (17%) and lowest in South Cambridgeshire (10%) and East Cambridgeshire (12%) whereas the percentage of residents who have been in the UK for 10 years or more is highest in South Cambridgeshire (46%) and Peterborough (40%). Fenland has seen much higher levels of recent migration (expressed as the percentage of migrants currently residing in the UK who arrived within the past 10 years) than any other areas of Cambridgeshire & Peterborough; 73% of migrants in Fenland arrived within the past 10 years, and 43% arrived in the last 5 years.
  - The highest rate of employment in non-UK born residents is in Fenland (73.5%), followed by East Cambridgeshire (72.0%). This is much higher than the England rate (56.7%) and higher than the East of England rate (61.2%), indicating that migrants in Fenland and East Cambridgeshire are settling in these locations for employment purposes.
  - A8 migrants<sup>3</sup> in Fenland often work in low-skilled, seasonal jobs that are low-paid and may be subject to zero-hours contract. Many migrant workers work below their skill level. Seasonal and shift work makes it difficult for migrant workers to make contact with services or seek help when needed. This is where projects such as Rosmini with their open access arrangements, together with access to legal advice, (and Access KL just across the Norfolk border in Kings Lynn) and other more specialised projects such as the homeless shelter and services provided by the Ferry Project can make a huge difference.<sup>4</sup>

<sup>3</sup> A8 covers the ten countries acceding to the EU in 2004 except for Malta and Cyprus, i.e. all East and Central European countries.

<sup>4</sup> The Ferry Project told us that labour exploitation issues consisted of about half of the cases they were working with. Access told us they had a wider geographical remit than just Kings Lynn and planned to work in both Great Yarmouth and Thetford. It is a classic example of an NGO which is funded from a rolling variety of non-statutory sources, with grants constantly having to be sought for and no support from the local authority.

- Migrants can face financial challenges when work 'dries up' or if they cannot work due to sickness. - eviction from housing is often a consequence of financial difficulties and loss of work.
- Employment issues arise due to low levels of understanding or lack of appropriate information about work entitlements, employment rights, holiday or sickness pay, access to benefits such as tax credits, or how the tax system works.
- The migrant survey showed that 21% of respondents said they have concerns about their safety on at least some days.

It is worth noting that, as of early 2019, partly due to the considerable uncertainty about the outcome of the Brexit discussions, but also because the balance of financial advantage for migrants to come to work in the UK has shifted against migration in the past few years, net immigration to the UK from the EU had dropped to its lowest level for ten years. This was causing considerable alarm amongst business groups about 'mounting labour shortages', particularly in areas typically filled by EU immigrants in recent years such as hospitality, agriculture, manufacturing and construction. Without a weakening of the 'hostile environment' for immigration, it seemed likely that there would be labour shortages and higher prices as a result. One other converse and negative consequence of the hostile environment was predicted to be that many more migrants would enter the country illegally, thus placing themselves in positions of vulnerability to exploitation. This would impact on modern slavery numbers particularly in areas like Fenland. In early 2019, the Home Office announced a new seasonal workers pilot allowing fruit and vegetable farmers to employ up to 2,500 non-EU migrants for up to six months. The scheme is managed by two companies which match farmers and workers and are responsible for worker welfare. The scheme will be reviewed at the end of 2019.

Information on issues that arise in relation to Eastern European migrants to Fenland is also obtained from Cambridgeshire Human Rights and Equality Support Services (CHESS) - an organisation that provides advice to migrants within the Fenland area on housing and Employment and which works with Rosmini with cross-referrals. They report:

- The main reason for Eastern European migrants settling in the Fenland area is for employment. Often migrants work in low-skilled, low-paid jobs and may be subject to zero-hours contract. When the work is finished, the worker is left with no job and no money until the next job arises and, given their lack of understanding of UK labour laws, often leaves them vulnerable to exploitation.
- There are many employment agencies in and around Wisbech which recruit Eastern European migrants for work. Most work involves agricultural labour or employment in the food packing business. People or agencies who supply or obtain labour to the fresh produce supply chain (processing and packaging of all fresh food, drinks and other produce through agriculture, horticulture, shellfish gathering) require a 'Gangmaster' licence and must be registered with the Gangmaster Licencing Authority (GLA-now Gangmasters and Labour Abuse Authority, GLAA). This scheme attempts to ensure that the employer meets the employment standards that are required by law.<sup>5</sup>

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<sup>5</sup> We accessed the modern slavery statement of one food manufacturer/packer in the Fenland area, G's (owned by the Shropshire group). This is a reasonably detailed account of the company's approach to addressing slavery in its supply chains with food coming from at least 9 countries outside the UK. This statement is rather more detailed than that of many other companies although, as again with many companies, it is yet to be clear how its aspirations will translate into outcomes. Other

- CHESSE receives referrals for migrant workers to provide advice in Fenland, mainly through the Rosmini Centre in Wisbech. In 2015/16, CHESSE saw 308 migrants with needs focusing on income, employment, benefits and housing. Issues identified by CHESSE then included:
  - Misunderstandings or lack of understanding or lack of appropriate information (in an accessible form – translated into a range of Eastern European languages) about work entitlements, holiday or sickness pay.
  - A lack of appropriate information on how to access benefits such as tax credits, child tax credits.
  - Little understanding of how the tax system works – how to make tax payments, what the tax codes mean. Some migrants end up in financial difficulties due to not understanding how the tax system works or how much tax to pay.
  - Lack of information about employment rights including issues around discrimination, injury at work, disciplinary actions or dismissal.
  - Financial difficulties due to sickness or zero hours contracts. Eviction from housing is often a consequence of financial difficulties and loss of work.
  - Seasonal work and the effect this has on migrant workers.
  - Shift work makes it difficult for migrant workers to make contact with services or seek help when needed.

Housing issues have come to the fore in the past few years. The JNSA observed<sup>6</sup>

- In 2011, 21.61% of the private rented sector in Fenland was in the town of Wisbech (2,071 properties).
- The private rented sector nearly doubled in 10 years in Wisbech (from 1054 properties in 2001 to 2071 properties in 2011). The largest increase in Wisbech was in the 'Hill' ward (135%).
- There is a prominence of Houses in Multiple Occupation (HMO) making up the private rented sector in Wisbech. In 2009 the Council's Private Sector Stock Condition Survey referenced 93.2% of Fenland's HMO profile as being in Wisbech.
- Much of the privately rented HMO housing is to meet the economic needs of businesses locally to provide accommodation for economic migrants coming from EU countries (predominantly central and eastern Europe).
- The Private Sector Housing team of Fenland District Council (FDC) regularly inspect properties known to be HMOs. However, Cambridgeshire Police and FDC quickly realised that there were broader issues than just large numbers of people living in shared accommodation. Additional concerns around exploitation, crime and disorder, linkages to street drinking, theft and rough sleeping were raised in Wisbech.
- In response to these concerns, a partnership was formed in 2012 that included Cambridgeshire Fire and Police, and FDC. The partnership launched 'Operation Pheasant', a multi-agency partnership. (see

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major food factories in the area include Prince, Greencore, Del Monte and Nestle Purina. A modern slavery statement is required, under S.54 of the 2015 Modern Slavery Act, to be published on the website of all companies based in the UK or operating there with a turnover of £36M+. One company, Manor Fresh Ltd, based at Holbeach, is actively campaigning against modern slavery.

<sup>6</sup> It is recognised that some of this data is slightly out of date but trends have been towards an increase in the numbers of HMOS and poor quality housing, albeit that a thorough and focussed inspection process from 2014 onwards is now slowly getting to grips with this subsector.

below).

- During the operation between January 2014 and April 2015, 487 Houses in Multiple Occupation in Wisbech were inspected.

From these inspections:

- 211 Category 1 hazards in accordance with the Housing Health and Safety Rating System (for example defects relating to inoperative boilers, poor electrical safety and absence of smoke detection) were removed.
- 386 Category 2 hazards (for example damp and mould growth, unsafe stairs & breach of security were removed).
- Action taken to eliminate 175 cases of overcrowding.
- 243 notices were served on landlords and agents to provide information or carry out improvements to private rented accommodation in Wisbech.
- 30 enforcement notices under Section 11 & 12 of the 2004 Housing Act and Planning Contravention Notices under Section 172 of the 1990 Town & Country Planning Act.
- 6 premises were closed down using powers under the Miscellaneous Provisions Act 1976, Section 29.
- There were 195 cases where poor management issues were addressed involving illegal eviction and harassment of tenants. This is almost certainly the tip of the iceberg as most people who are illegally evicted do not report it to the police or housing authorities so there are no reliable statistics.

Operation Pheasant made the decision to conduct a pilot programme of visits from a community safety perspective. Cases of extreme overcrowding (15-20 people) living in 3-bedroom properties were uncovered as well as 'hot bedding' (people sharing a bed consecutively in time) and significant safety issues – no smoke detection devices in some properties. Exploitation of individuals was uncovered in terms of tenants having no tenancy rights, illegal evictions, child protection issues, exploitation by way of control, trafficking, and threats of violence. Arrests have been made as a result of this project which continues to the present (see below). Several labour suppliers have become very active in the area, one of them now operating from within a former Prisoner of War camp and more latterly a student accommodation centre for seasonal workers, at Friday Bridge south of Wisbech where workers are housed in barrack-type accommodation which is generally tied to work. This company now has a major recruiting centre within Wisbech Town Centre.<sup>7</sup>

The work of Operation Pheasant has uncovered a range of issues relating to criminal activity, sometimes perpetrated by migrants themselves against co-nationals, often acting as criminal gangmasters. A summary of the early findings of Operation Pheasant is given below.

This has been conducted in Fenland since 2012 with the help of partner organisations – Police, Fenland District Council, Gangmaster Licensing Authority (now GLAA), Home Office Immigration Enforcement, Cambridgeshire Fire & Rescue and HM Revenues & Customs (HMRC), to engage with migrants in the community with the aim of uncovering criminal activity and other significant issues that affect these groups of people. Over 3,000 voluntary questionnaires were completed during home visits to the mainly migrant population living in Houses of Multiple Occupation. This identified a range of issues including organised crime, exploitation, fraud, sham marriages and human trafficking. Advice is given in relation to fraud, exploitation, property condition and workers' rights.

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<sup>7</sup> There are a number of labour suppliers (gangmasters) active in the area, some of which appear legitimate, others less so. Concerns were raised with the researcher about the tying of work to housing and vice versa, thus placing workers in an entirely dependent situation, and about employment conditions including the failure to pay minimum wage levels.

Workers have come forward to the Council and Police as a result of this approach with their concerns to inform crime investigations. The operation, by having a 'community first' approach, has encouraged engagement with historically hard-to-reach migrants. Some victims have come forward for example by coming in to the Police station with an envelope with Operation Pheasant written on it to ask for help. Fenland District later received funding from the Home Office's Controlling Migration Fund.

In more detail:

- - Between September 2012 and April 2015, there were 76 cases of human trafficking referred to the National Referral Mechanism. The National Referral Mechanism is a process where individuals who are believed to have been subjected to human trafficking are given specialist advice and support to come to terms with the abuse they have suffered and start to re build their lives out of the area. Further NRM data is given below
- - There was evidence of extensive criminal activity coordinated between rogue gangmasters and rogue landlords providing temporary homes for workers. This included facilitating overcrowded properties, with safety hazards including no smoke detection, exposed wiring, blocked means of escape, damp and mould.
- - Tenancy issues including harassment and illegal eviction resulting in homelessness.
- - Evidence of exploitation in the form of stolen deposits, stolen papers, no tenancy agreements or rent payment receipts, extortionate rents being charged, loans taken out in people's names without their knowledge and fraud.
- - Wages paid to workers in cash to avoid payment of tax and without payslips, often with a third party taking a slice of the money for themselves. Penalties such as deductions of money received due to a range of bogus issues are also common, leaving the worker vulnerable and unable to see a way forward without help. (Another concern is numbers of workers who receive just enough hours to keep them below the rate that employers need to pay NI: savings for employers but poverty for the employee).

Labour exploitation was not widely understood as a human trafficking problem but it is a significant one. Of cases that have been uncovered in the UK, a significant majority involved men from countries such as Lithuania, Poland and Romania. Police and FDC have tackled local property agencies who are engaged in exploitation between gangmasters and migrant workers, this work is continuing and the work has received national recognition through the Home Office, immigration and enforcement and housing. The council has been successful in a bid for funding from the Rogue Landlord Taskforce to help maintain momentum in this area of work.

It is probably reasonable to state that, along with the face-to-face work of the Rosmini project (which had been active since 2008 but began to identify the issue of modern slavery a few years later) and other NGOs, the early shape of modern slavery in Fenland began to make itself known from 2012 onwards as a result of this work.

#### **4. Modern slavery**

The issue of modern slavery in the UK as a whole only began to be manifest from the early part of the twentieth century and UK governments were generally fairly sceptical about the nature and scope of the issue in the early days. Whilst the EU introduced the Palermo Protocol in 2000 as a means of responding to the emerging issue of human trafficking, the UK was one of the last EU member states to sign the Protocol. A Parliamentary question in 2005 as to the number of women trafficked to the UK brought a government response that it was between 147 and 1470, a response which was both very vague and seemingly precise: what it showed was the very poor understanding of the issue that was then current and the poor quality of then-current research. Much of the pressure for action came from NGOs and a few academics working particularly around the issue of sex trafficking of women and children although the JRF Forced Labour research programme from 2009 had an important impact in widening debates about the nature of modern slavery. Key milestones in the developing debate about modern slavery in the UK are as follows<sup>8</sup>:

2007: The Joseph Rowntree Foundation commissions the first national scoping study of modern slavery in the UK and follows this with a three-year research programme exploring the nature of forced labour within the UK. (See e.g. <https://www.jrf.org.uk/report/modern-slavery-united-kingdom>)

2010: A Private Member's Bill introduces the idea of Anti-Slavery Day. The Home Office launches the Human Trafficking Centre, established first in Sheffield but later subsumed into the National Crime Agency.

2012: The All Party Parliamentary Group on Human Trafficking is renamed The All-Party Parliamentary Group on Modern Day Slavery (a significant move as it acknowledged that human trafficking was only one of many forms of modern slavery).

2013: Home Secretary announces the publication of a Modern Slavery Bill. This was found to be deficient in many respects and was completely revised and republished prior to a year-long debate about the Bill.

2015: The Modern Slavery Act is given Royal Assent on the final day of Parliament before it was prorogued for the General Election. Parallel and slightly differing legislation is introduced in the Scottish Parliament and in the Northern Ireland Assembly. A Home Office study suggests there are between 10,000 and 13,000 people in the UK in forms of modern slavery at any one time.

2016 -: A coordinating NGO is established, the Human Trafficking Foundation, which brings together hundreds of NGOs working on the issue. Growing and profound criticism of the Act's provisions are voiced from many quarters, including the European Council's Committee of Experts on Trafficking, the National Audit Office and, in respect of the failure of police forces to act effectively on the issue, by Her Majesty's Inspectorate of Police and Fire and Rescue Services. Many NGOs are also critical of the failure of the Act to offer effective support to victims, its focus on

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<sup>8</sup> This is discussed in detail in G. Craig et al (eds) (2019) *The Modern Slavery Agenda*, Bristol: Policy Press.

criminal justice and links to immigration issues, and of the failings of the National Referral Mechanism (NRM), the formal system for assessing the claims of people to be victims of modern slavery, which is branded as both racist and not fit for purpose.

Multi-agency partnerships begin to be established in many parts of the country: many are, however, criticised as being dominated by police forces and not true partnerships.

2017: The NRM receives almost 6000 referrals. However, the National Crime Agency later suggests that there may be ‘tens of thousands’ of people in slavery in the UK and one estimate from an NGO in 2018 puts the figure at 136,000. It is now widely recognised that, despite the Act’s continuing emphasis on human trafficking, there are many forms of modern slavery present in the UK including forced labour/severe labour exploitation, domestic servitude, forced child labour (begging, pickpocketing, shoplifting, benefit fraud), cannabis farms, and organ trafficking – a Home Office research paper suggests that there are at least 17 forms<sup>9</sup>). The Home Office established the Modern Slavery Police Transformation Programme to help underperforming police forces. Modern slavery is now understood to be present in every industrial sector and there is growing interest in the issue of supply chains, where the government’s legislation is increasingly seen to be very weak. No prosecutions have followed at all during the four years since the Act was introduced despite the failure of thousands of companies to put the relevant Clause 54 into effect.

2018: The first Independent Anti-Slavery Commissioner, Kevin Hyland, resigns, citing interference from the Home Office in his work. The government announces an independent inquiry into the workings of the Act to be led by Frank Field, and simultaneously the Home Affairs Select Committee of the House of Commons initiates its own inquiry. The NRM received slightly under 7000 referrals in 2018, almost 2000 (30%) up on 2017 and a similar increase seems likely for 2019.

2019: Three new sites of modern slavery – ‘county lines’ (the use of trafficked young people as ‘mules’ to transport drugs from urban to rural areas), nail bars, and pop-up car washes, attract significant attention.

The conclusions of the Independent Inquiry into the Modern Slavery Act have been published in May 2019 at <https://www.gov.uk/government/publications/independent-review-of-the-modern-slavery-act-final-report> The report of the Home Affairs Select Committee is unlikely to be available until very late in 2019.

The government has announced some preliminary responses to the Independent Inquiry’s findings including to:

- Create a free online registry of modern slavery statements, to make it easier for consumers, investors and NGOs to track compliance and action that businesses are taking.
- Consult on changes to the transparency in supply chains legislation, specifically strengthening and improving the transparency statements required of businesses and expanding the law to cover the public sector and its vast purchasing power.

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<sup>9</sup> <https://www.gov.uk/government/publications/a-typology-of-modern-slavery-offences-in-the-uk>

- Create a new International Modern Slavery and Migration Envoy to represent HMG interests on modern slavery and co-ordinate our efforts with other nations.
- Fund a £10million programme to reduce the exploitation of children in Africa's rapidly expanding agricultural industries.
- Pilot a new programme to improve responsible recruitment in parts of our public sector supply chains that pass through Asia.

### *Modern slavery in Fenland*

As noted above, awareness of the existence of the issue of modern slavery in Fenland came from about 2012, through the work of Operation Pheasant, and through that of leading NGOs in the area. Interest, though not always welcomed and often extremely ill-informed and factually incorrect, was also generated by media coverage of the growth of the migrant worker population in the area. In 2018, a leading national anti-slavery NGO, Stop the Traffik, undertook a one-off campaign to raise awareness of modern slavery in the area. However, whilst the level of awareness and activity has grown over the past few years, this has not been translated into significant effective outcomes on the ground. The mid-range estimate of the number of people in slavery in Cambridgeshire would be (based on a national figure of 40,000) around 500 people in Cambridgeshire (including Peterborough), or around 60 at least in Fenland (but probably many more since the migrant worker population is heavily concentrated in that area). The 2018 returns to the NCA National Referral Mechanism database showed that only 6 referrals (all minors) had come from Cambridgeshire County Council and 18 (12 adults, six minors, all bar one for labour exploitation) from the Cambridgeshire Police Force (compared with 25 in 2017) and it was only late in 2018 that the first successful prosecutions were announced for modern slavery crimes in the county.

It is worth noting that this is not outwith figures for other rural police forces, many of which made a very slow start to anti-slavery work and were criticised in the HMICFRS report, although, unlike Cambridgeshire, the trend in rural police force areas has generally been for a slow increase in numbers year on year. It is also important to stress that collecting evidence for the prosecution of cases is often long-winded, has to address the fears of victims and that some victims may have given up on having their cases pursued after some months and perhaps returned to their country of origin. The issue of Modern Day Slavery was only recognised as an issue from 2012 although the Rosmini Centre had been dealing with issues, contacting statutory bodies since 2007. It was only when statutory authorities were able to apply for specific funding that operations like Operation Pheasant came about. NGOs continue to deal with individual cases of exploitation and modern day slavery without government funding.

One relevant factor here is that even though field work is highly unskilled in general, most migrants undertaking it are recruited from villages where they have had experience of fieldwork. Subsequently, many have not completed education and have limited or no reading/writing skills in their native language so are unable to access any information other than by word of mouth. They also have less emphasis, because of this, on retaining paperwork, documents etc which makes it difficult to evidence criminality where exploitation has taken place.

Additionally, many potential victims approach a number of organisations and it is only when all of

the information can be collated in one place, that it becomes apparent that they are being exploited. GDPR has had a negative effect in that organisations have in the past refused to share relevant information. Rosmini has now instigated a legal document which can be signed by clients and named organisations to overcome this. Other organisations could do this too.

Stop the Traffik's campaign, conducted during September, confirmed the shape of modern slavery in Fenland as being that largely identified by the work of local NGOs and Operation Pheasant. The campaign involved high level publicity, training for professionals, and its evaluation later asserted that it had been effective in raising awareness of the issue amongst many of those targeted, including particularly, the Lithuanian population. Sites of modern slavery were identified as food factories, recycling plants, fields, car washes, building sites, shops, and forms of forced criminality including amongst children. The evaluation of Stop the Traffik's campaign noted several key points including the importance of using social media campaigning materials, working closely with local statutory and voluntary sector partners, a focus on labour rights, the use of multi-language materials, and the importance of appropriate imagery in campaigns for those with limited English language skills. Widespread evidence suggests that many victims do not identify themselves as victims which is why they don't report the issues to the police or statutory agencies.

Although Fenland is the focus of this report, it is important to state that, as noted earlier, modern slavery is also a key issue in adjacent authorities. In 2018, the neighbouring East Cambridgeshire local authority was the subject of a report by Cambridgeshire County Council's Research Group which identified many similar issues to those raised within Fenland. It identified the importance of partnership working as in Operation Pheasant but observed that work against modern slavery in the county as a whole remained poorly-evidenced and coordinated. Across the county, 25 people were claimed to be referred into the NRM from Cambridgeshire County as a whole, with Romania, UK and Lithuania the three most dominant nationalities of those referred.

### *Modern slavery in Fenland: local perceptions and experiences*

As noted earlier, a significant part of the early research involved interviews with key actors in the area.

An initial list of key actors was drawn up and through networking and snowballing, a final list of 22 potential interviewees was drawn up. Eighteen interviews were conducted in October-December 2018: one respondent remained unavailable, the Bishop of Ely's office did not return several emails (despite their known interest in the subject area and having hosted a recent multi-agency meeting of the Clewer initiative attended by more than 50 people<sup>10</sup>), Stephen Barclay MP (for whom the researcher had drafted a speech for his intervention in the debates of the MSA in 2014 and who had taken an early interest in the issue) was understandably 'otherwise engaged', and the Salvation Army refused permission for the researcher to talk to their staff. This was disappointing since the SA has a large, well-equipped and modern establishment in the heart of Wisbech which could make a very suitable safe house for victims of slavery. Interviews lasted between 30-50 minutes and the following account summarises the key issues identified from these interviews. The researcher is grateful for the

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<sup>10</sup> The Bishop of Ely's office had had some involvement in several events over the past years, one at the instance of the local MP, and had engaged with the Eastern Baptist Mission in one event but seemed very unwilling to commit resources to the work now.

cooperation of those who contributed their thoughts and experience. Respondents came from local authority, voluntary sector, faith, legal, police and independent backgrounds.

Key issues (in no particular order of importance) raised in the interviews were as follows:

- i. From 2012 on, starting with the creation of Operation Pheasant in Fenland District, a number of initiatives have been generated to focus on the issue of modern slavery. These have included work at a county level, and within the neighbouring authority, East Cambridgeshire (Community Eyes and Ears), generally under the umbrella of community safety committees. One striking thing about these initiatives is that local NGOs, including active faith groups, have generally been excluded from their deliberations, a feature acknowledged by many of the respondents – including statutory bodies - to the study, which makes the claim of key statutory members of these organisations to be involved in partnership working somewhat weakened. Indeed, Rosmini went further and argued that the role of NGOs appeared to be subservient rather than as true partners: they noted that they had sent details of more than one hundred and fifty cases (including both potential victims and perpetrators, drawn from and recorded in their detailed monitoring records) to the police force and had heard nothing back from the local police force about the outcomes of any of these referrals. This is important because, whilst recognising that the police cannot share operational details, it is helpful for referring agencies to know if their suspicions are well-placed and appropriate for referral.
- ii. Whilst a number of agencies had devoted considerable new resources to working on this emerging issue since 2012, most felt hampered by the government's stance in several ways. The impact of austerity on local budgets was mentioned with, for example, childrens' services suffering cuts of around one-third in the last seven years, police budgets being similarly cut, and many front-line NGOs experiencing cuts to their grants and having to spend more time seeking funding from outside the county; and, despite the government claiming that the Modern Slavery Act was world-leading, many facets of it were found to be unhelpful in terms of providing support to victims, such as the lack of a systematic provision for victim support including a safe house locally, the misuse of the statutory defence which led to victims being criminalised, links between the NRM and the immigration service which resulted in many potential victims feeling frightened to refer themselves into the NRM, and the failure of the government to establish a coherent ongoing child advocate service.
- iii. The importance of having publicity and campaign materials in key languages other than English was stressed. Some organisations had embraced this need assiduously, others less so. The publicity was often not coordinated between agencies and there is a sensible case for future publicity to be jointly produced. There is a wide range of effective targeted material available from established national organisations such as Stop the Traffik, Stronger Together, the Gangmasters and Labour Abuse Authority and some childrens' organisations which could be adapted for local use. Some organisations, including Rosmini and the police, now employ workers from some of the countries featuring strongly in the migrant worker population. Again, this could be seen as best practice.
- iv. The training provided by the consultant appears to have been effective, with a high level of demand: about 150 people attended one of the four training sessions in Wisbech or Ely and the overall rating was between 4 and 5 on a scale of 1-5. The majority of those attending came from four sectors: local government, police, voluntary sector organisations and housing providers. Particularly noticeable by their absence were representatives of health organisations. Given that many front-line health workers may come into contact with people

who have been trafficked or have been in forced labour, this is a cause for some concern and it may be that the programme sponsors attempt to make specific contact with health providers to explore their training needs. A particular concern from these sessions was that feedback through monitoring and evaluation highlighted the fact that if potential victims were identified during the day to day delivery of services all attendees were unclear as to the reporting procedure within their own organisations and often didn't receive feedback regarding information they had submitted in the past so were less likely to report in the future.

- v. The importance of partnership working was stressed by many respondents as being effective in bringing a range of skills and experience to bear, but, as noted earlier, many NGOs frequently felt marginalised to this process and argued for a stronger and equal role in partnership working, particularly in light of their frontline contact with many victims and potential perpetrators<sup>11</sup> of modern slavery but this would need funding and the majority of funding goes directly to statutory agencies.
- vi. Key positive action which appears to have made a difference in the area has been that initiated through the Community Diversity Forum, chaired by Fenland District Council, which brings together all organisations working with diverse communities. The Forum enables organisations to share information, and tackle issues, and has an Action Plan that all organisations are encouraged to take ownership of. Changes to staffing and restructuring of district and county councils, and the police authority, changes to service delivery organisations through the tendering process, makes it difficult however to work in partnership due to inconsistent staffing and representation. The Community Diversity Forum enables Fenland organisations to continue as a group even when individual participants change.
- vii. Whilst there were several very active NGOs in the area, faith groups had made a much less significant anti-slavery input. The reluctance of the Salvation Army to become involved has been mentioned above<sup>12</sup> and the Diocese of Ely argued that it was not their job to lead an initiative on modern slavery. The Diocese of Peterborough also appeared to have a very low profile in this area. The Diocese of Norwich, encouraged by the Clewer Initiative<sup>13</sup>, has initiated a multi-agency forum. The church of course has a potentially very important role to play as it has parish populations at grassroots level which can be ears and eyes for very local anti-slavery work.
- viii. Some statutory organisations had modern slavery as part of a wider remit (eg diversity); some had modern slavery as a specialised area of work but within a subgroup or subcommittee (sometimes known as delivery groups) or even a single officer reporting to a body with wider responsibilities (strategic officer-led boards: e.g. children's services or community safety). There were not, however, specialised and well-resourced organisations in the statutory sector with a single focus on modern slavery work. This slightly complex array of organisational approaches may mean that collaboration and coordination was not as effective as it might be in ensuring focussed action although there were examples of good inter-agency working, e.g. some of the support given from Cambridgeshire police to Fenland district. The way into

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<sup>11</sup> Rosmini had considerable experience of informal gangmasters asking for help in acquiring multiple NINOs for 'gangs' working for them.

<sup>12</sup> The Salvation Army in Wisbech later responded to a question about modern slavery that they were not involved at all in modern slavery issues in the area and that all the work was done from their HQ in London.

<sup>13</sup> The Clewer Initiative is a national programme of work supported by the Church of England to develop anti-slavery work from within the church. See <https://www.theclewerinitiative.org/>

modern slavery work had been varied; for some it was through work with travellers, for others through housing or labour exploitation, for yet others through child abuse. The overarching work done on safeguarding in the county also acknowledged that there had been a much stronger emphasis on work with children than with adults. This meant that the perspective each organisation took might have been somewhat different rather than a common wider strategic understanding of modern slavery as a whole. It is hoped that some of the training initiatives may have helped to correct this imbalance. It was also observed that information sharing was not good and some statutory organisations said that they were aware of a modern slavery partnership at county level but that ‘no one knew anything about it’. One NGO expressed itself ‘disgusted’ at the lack of involvement with it at county level. Conversely, at least one statutory organisation expressed itself unaware of NGOs working on modern slavery in the area. One other relevant criticism was that many organisations took a reactive stance, rather than being proactive in searching for and identifying victims of slavery.

- ix. Whilst each organisation encountering potential slavery victims worked to support them individually within their own frame of reference, there was no coordinated victim support strategy across the piece, including a safe house for victims within or near to Wisbech. It is recognised elsewhere in the UK that this strategy needs to include provision for individual support, counselling, money advice, housing and benefits support, support for children where appropriate and help into work. This requires a strategic approach and effective funding; research elsewhere shows that the lack of support often means that victims are re-trafficked even after they have received a conclusive positive decision from the NRM. Lord McColl’s Private Member’s Bill may help to change this as it would require the government to fund adequate victim support in every area for at least a year. The unavailability of the Salvation Army in this strategic approach would be worrying, particularly as the national organisation currently holds the national contract from the Home Office for victim support. It was noted by some respondents that the Salvation Army had had no impact within Wisbech at all. One SA volunteer noted that victims identified elsewhere in the county were often transported as far afield as Lancashire to find safe houses. Overall the focus on criminal justice approaches, with anti-slavery work dominated by the police in terms of organisational leadership<sup>14</sup>, rather than on victim support, reflected the government’s broad approach, which has been widely criticised over the past four years.
- x. The overwhelming concentration of modern slavery cases in the past few years in Fenland have concerned labour exploitation of some kind, often linked to housing exploitation. One respondent noted that sex trafficking was probably more widespread than known about (particularly as small short-term ‘pop-up’ brothels were difficult to monitor although these tended to appear more in the urban centres of Cambridge and Peterborough, and of course trafficking and labour exploitation might be occurring for some individuals simultaneously) but new forms of modern slavery were emerging and it was important that training and awareness raising both for paid workers and for the public was kept fully up to date. This kind of work, particularly around publicity and campaigning, ought properly to be coordinated through a single body to avoid conflicting messages.
- xi. The training sessions run by the researcher were, as noted, well-attended and well-received. However it is clear that there remains a need for considerable more training to be available, especially for front line staff many of whom seem still unaware of the NRM and their

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<sup>14</sup> Interestingly, many of the key players in the statutory sector were themselves ex-police officers.

responsibilities under the legislation especially as ‘first responders’ or as referring agencies. A particular concern is that feedback through monitoring and evaluation highlighted the fact that if potential victims were identified during the day-to-day delivery of services, all attendees were unclear as to the reporting procedure within their own organisations and often didn’t receive feedback regarding information they had submitted in the past so were less likely to report in the future. It was also noticeable that some major organisations did not attend any of the training sessions provided: notable absentees were health organisations. Although the NHS has provided some guidance for staff and the RCN has issued guidance for its members, it seems unlikely that NHS organisations in the area are as well-equipped as they should be given that many trafficked people may have been in touch with services such as GPs, A and E and school nurses.

- xii. Regarding training needs more generally, although there has been a drive in recent years to provide Cultural Competency Training in Cambridgeshire there still remains within some organisations a lack of understanding of cultural differences, exploitation and modern day slavery resulting in a negative attitude and lack of empathy towards some of the issues faced by migrant workers, often leading in turn to an inequality in service delivery.
- xiii. Whilst it is true that most of those identified as being in forms of modern slavery were of non-UK nationality, particularly from East and Central Europe, it is important to stress that some were UK nationals, often people with learning disabilities who had been picked up at homeless hostels, soup kitchens etc and then taken to work in highly exploitative conditions and proactive work might focus on these sites. It was also noted that some gangmasters had been around for some time and had immersed (‘hidden in plain sight’) themselves in UK culture; several foreign nationals have been found to be buying and/or setting up local businesses including charging for Information, Advice & Guidance, illegal sub-letting and other immoral and sometimes illegal services.
- xiv. The more recent phenomenon of ‘county lines’ was said to be less prevalent in Fenland because of a lack of a direct train line from Wisbech to major urban centres; however, incidences of county lines were beginning to emerge with young people trafficked by other means of transportation. Youths on push bikes have been observed delivering drugs in the Wisbech area. In one training course, when the researcher observed that county lines were perhaps less noticeable locally because of the absence of railways in the area, the police response was that county lines were run along telephone lines. Locally there had been a noticeable incidence of cannabis farms and illegal car washes in recent years and county lines issues were slowly increasing in the area.
- xv. The role of mainstream media, including most, of the daily national tabloids has been extremely negative in terms of their frequent misrepresentation of the facts about migration and their inability to either provide adequate fact-based context for their comments or balancing material about the positive contribution made by migrants to local life. Wisbech, the centre of the project work described here, has had a long history of migration which has in general worked to the benefit of the area yet migration is continually portrayed in a negative light. There is scope here for local agencies to collaborate in producing positive images of the impacts of migration and for challenging the lies generated by these sections of the media.

This list of issues provides an agenda of change which all agencies might want to address in a true

partnership manner.<sup>15</sup> One statutory respondent argued that Cambridgeshire was well ahead of national action in terms of what it is doing: the evidence, however, suggests otherwise. The researcher shared a number of national reports with respondents which might help them understand that there is good practice elsewhere on which they might draw, not least in terms of partnership working.<sup>16</sup>

## **Modern slavery and rurality**

The project reported here is unusual, perhaps unique to date, in that it focused on the issue of modern slavery in a rural context.<sup>17</sup> This raises a number of issues which need to be thought about for others wishing to initiate or sustain modern slavery work in rural areas. In summary, these are as follows:

- Most anti-slavery work in the UK has tended to concentrate more on issues of human trafficking than other forms of slavery. The 2015 Modern Slavery Act has tended to reinforce this narrow perspective. As will be clear from this report, although trafficking is far from unknown, the major focus of modern slavery within rural areas has tended to be labour exploitation, associated with some of the original industrial sectors in which modern slavery first generated a political and policy response, namely agriculture, forestry, food production and processing and horticulture. In recent months, the issue of county lines, in which slavery issues are effectively fed from urban into rural areas, has begun to be significant. These both require specific responses from investigating and regulatory bodies.
- Distances between towns and centres of population, and the sparseness of those populations means that the normal kinds of everyday observation and monitoring which might be feasible in urban areas, are more difficult and more costly. It is relatively easy for an illegal gangmaster to hide workers in a caravan two miles down a rough track than it is for a trafficker to hide exploited women in an urban street.
- This also impacts on organised responses to slavery, including the ability to create sustainable partnerships. In some rural areas such as Lincolnshire and North Yorkshire, for example, bringing organisations together physically may mean 80 mile round trips for some partners with the cost in money and time that that implies.
- Hate crime data over the past years, including since the 2016 Referendum, suggests that rates of hate crime have grown more substantially in relative terms in rural areas than in urban areas. Victims of hate crime, correspondingly, find it more difficult to report hate crime

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<sup>15</sup> Nottingham University has identified a number of aspects of good practice for partnership working in this area. See <http://iascmap.nottingham.ac.uk/CollaboratingforFreedom.pdf>

<sup>16</sup> The researcher manages a national network, the Modern Slavery Research Consortium, which provides information, details of policy and legislative changes, and research briefings. Contact [gary.craig@garyc.demon.co.uk](mailto:gary.craig@garyc.demon.co.uk) for joining details.

<sup>17</sup> This is not the place to go into a long debate about the nature of rurality. The fact is that towns like Wisbech, however 'urban' the town may feel, are defined to be a part of rural areas by most formal definitions and the organic relationship between small market towns like Wisbech and their rural hinterlands should be regarded as a rural whole.

incidents both because of the distances to get to a reporting centre and because of the impacts of isolation from co-ethnic groups and absence of support groups, which makes victims more vulnerable. In this context, given the stresses placed on rural areas (which might hitherto have had small minority populations) by unplanned large-scale in-migration and the hostile misrepresentation by much of the mainstream media, public attitudes to the vulnerability of minorities are likely to be mixed at least and downright hostile at worst, making victims of modern slavery less likely to be identified and supported than they might be in more urban settings, and certainly less likely to seek help. This again stresses the need for organised responses to the impacts of 'race' hate, including through counter-publicity.

- It is significantly more difficult, even where agencies have the political will (which, as we can see is not always the case) for them to work together in effective partnership. This requires greater levels of investment in time and other resources and agencies have to find creative ways to build strong partnerships which address these kinds of issue. In areas such as Cambridgeshire, there are significantly fewer resources – NGOs, legal advocates, victim support agencies, activists – than in rural areas, which tends to place greater strains on those active in the area. It is difficult to contemplate seeking legal advice if this requires a journey to a distant urban centre, for example.

These, and other dimensions of rurality, suggest that those national fora working on issues of modern slavery should always have a strong element of their working agenda which explicitly raises issues of prime concern to rural areas. These agencies might include for example, the Office of the Anti-Slavery Commissioner, the All-Party Parliamentary Group on Modern Day Slavery, the Human Trafficking Foundation and its various special interest groups, and the Local Government Association. It would also be useful if those agencies training people to work with the public were able specifically to focus on the differences between rural and urban contexts.

