

Chair  
Public Accounts Committee

By email

10 July 2020

Dear Chair,

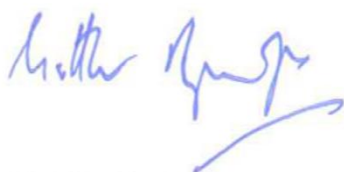
I am writing to you with an update on the work the Home Office has delivered in implementing the Public Accounts Committee's (PAC) recommendations in its report 'Reducing Modern Slavery'.

The Home Office last issued an update by way of a Treasury Minute in February 2020. The Department has made significant progress in implementing the PAC's seven recommendations. Two recommendations have now been fully implemented, with the others on track to be finalised later this year or to be included in longer-term strategic work programmes.

With this letter I am attaching a summary of our achievements in taking forward this work, and - for those recommendations which we continue to deliver - a summary of the steps taken to date and information about our plans to finalise implementation.

I hope this letter provides reassurance on how seriously the Department takes the PAC's report and our commitment to create lasting change through our modern slavery response. I look forward to updating you further in due course.

Yours sincerely,



**Matthew Rycroft**  
**Permanent Secretary**



## Update on the implementation of recommendations

**1: PAC recommendation:** *In order to effectively track whether its Modern Slavery Strategy is working and prioritise funding and activities, the Department should set targets, actions, a means of tracking resources, and clear roles and responsibilities within the programme and report back to the Committee by December 2018.*

**Target implementation date:** Summer 2020

**Original implementation date:** December 2018

**The Department has taken significant steps to address this recommendation. We will work to finalise implementation by Winter 2020.**

To date, the Department has implemented a number of the recommended deliverables, such as:

- We published statutory guidance under Section 49 of the Modern Slavery Act 2015, in March 2020, providing a clear framework of support for some of the most vulnerable people in our society. **The guidance clarifies the roles and responsibilities of public services, frontline staff and local stakeholders** and sets out the support victims are entitled to and how this is accessed.
- The Department's **Modern Slavery Unit has delivery plans for all areas of the modern slavery response, including key milestones and activities**. The Unit also monitors its expenditure on all areas of delivery and targets resources to address priority deliverables.
- There has been a focus on being able to **collect much more granular and robust data as part of the new Modern Slavery Victim Care Contract (MSVCC)** which was awarded in June 2020, for example on performance measures and the needs of victims. In addition, three of the Key Performance Indicators in the new contract will be published, demonstrating our commitment to increased transparency around the contract.

To finalise the implementation of this recommendation, the Department will continue to work with other government departments (OGDs) to develop an enhanced performance framework for the modern slavery strategy. We will work to implement this by **Winter 2020**.

**2: PAC recommendation:** *The Department should continue its work to gain a better understanding of the crime, the victims and the perpetrators, in order to target its prevention work effectively. It must take account of the potential impact of other factors such as the exit from the EU.*

**Target implementation date:** Spring 2020

**Original implementation date:** Spring 2019

**I am pleased to confirm that we have fully implemented this recommendation.**

The Department is committed to improving evidence about the nature and scale of modern slavery to inform our response to preventing modern slavery from taking

place. We have taken significant steps since the PAC report to deepen our understanding of the crime and use this knowledge to target prevention effectively. For example:

- In July 2019, HMG announced it would **invest £10 million to establish a new Modern Slavery Policy and Evidence Centre**. The Centre will bring together and commission new research to enhance the evidence base and improve understanding. The Centre will pool expertise and accelerate progress, working closely with policy makers to target resources to key risks and vulnerabilities. The Centre has launched two research calls: the first looks at the current support system for victims and survivors of modern slavery, and the second is a rapid response call on the impact of COVID-19 on modern slavery.
- The former Modern Slavery Police Transformation Unit (MSPTU) facilitated **increased information exchange between NGOs and police**. This year, the Home Office has provided further funding of £1.4 million through the Modern Slavery and Organised Immigration Crime Programme (formerly the MSPTU) to support the police response to modern slavery, which includes improving the awareness and identification of victims.
- The Joint Slavery and Trafficking Analysis Centre (JSTAC) has **improved the intelligence picture** and the National Crime Agency (NCA) has committed to resource JSTAC for at least three years commencing April 2019.
- We also **continue to build the evidence base through our international programmes**. The Modern Slavery Fund works in high risk countries from where we know victims are regularly trafficked to the UK, and the Modern Slavery Innovation Fund tests innovative approaches to build the evidence base on what works. Building on the lessons learned from these programmes means we are able to target our prevention activities effectively.
- We are currently **undertaking user research, engaging directly with survivors to better understand their recovery needs** and their experience in the National Referral Mechanism. Our aim is to better understand the survivors' journey through our current support system and their interactions with other services. The findings of this research will provide a strong evidence base for any improvements we introduce to our support system in the future.
- We will **continue to work with European partners to eradicate modern slavery** no matter what shape our relationship with the EU takes. We continue to discuss with the EU future arrangements on law enforcement and judicial cooperation in criminal matters. This includes cooperation through agencies such as Europol and Eurojust, where we are committed to working with EU partners to tackle a range of threats, including human trafficking.

We remain committed to furthering our understanding modern slavery, its victims and perpetrators, and will continue this work as part of our 'business as usual' approach going forward.

**3: PAC recommendation:** *The Department should take immediate action to ensure that its Transparency in Supply Chains legislation is more effective. It needs to drive up compliance, by actively administering and monitoring compliance and should write to the Committee by April 2019 setting out what progress it has made and its latest estimate of compliance and demonstrating how this is improving transparency. The*

*Department should consider publishing itself a list of companies who have complied and not complied with the legislation, rather than relying on NGOs to police the system.*

**Target implementation date:** Spring 2020

**Original implementation date:** Spring 2019

**I am pleased to confirm that we have fully implemented this recommendation.**

The UK is the first country in the world to require businesses to report on the steps they have taken to tackle modern slavery in their operations and global supply chains, and the Home Office has taken great strides to drive up compliance with this agenda. Since the PAC report, the Department has made significant progress including:

- Through its campaign of approximately 16,000 letters, **the Home Office has written twice to the CEOs of businesses identified as being in scope of the legislation**, with clear information about how to meet their obligations. The Department has also undertaken an audit of compliance against these organisations and is considering its next steps towards organisations which have not demonstrated compliance.
- The Department has **consulted on options to strengthen the transparency provisions in the Modern Slavery Act** and level the playing field for responsible businesses. The consultation sought views from businesses, public sector organisations, NGOs and other affected stakeholders. The Government will publish its response this summer.
- In March 2020 we became **the first country to publish a Government Modern Slavery Statement** setting out the steps we have taken to identify and prevent modern slavery in our own supply chains. Individual ministerial departments will publish their own annual statements from 2021 onwards.
- **Work is underway to create a free online central reporting service for businesses' modern slavery statements.** This will make it easier for consumers, NGOs and investors to scrutinise the action businesses are taking to prevent modern slavery in their supply chains. The service is likely to launch in early 2021.

While we consider this recommendation to be implemented, we are continuing to drive forward and cement our global leadership in this space, including through launching the central registry and responding to the public consultation.

**4: PAC recommendation:** *By January 2019 the Department should ensure that the reformed NRM system enables it to collect and analyse data to understand the crime, the businesses and the sectors where prevalence is highest, and, where victims consent, to understand what happens to victims after they leave the NRM.*

**Target implementation date:** Spring 2020

**Original implementation date:** Summer 2019

**The Department has taken a number of steps to address this recommendation and will continue to prioritise robust data collection.**

The Home Office has delivered significant reforms to the National Referral Mechanism (NRM) which have enabled us to collect data to better inform us of the crime and its victims. For example:

- In 2019 we **launched a new integrated digital system which is used by all caseworkers in the Single Competent Authority** when they make decisions on potential victims of modern slavery referred to the NRM. The system makes it easier for those on the front line to refer victims into support by providing a single point for referrals across the UK and seeks to support an effective and efficient case management process in enabling the identification of victims. It also aims to **provide richer data to better understand referrals** to inform future needs for the NRM system and our wider understanding of the threat from modern slavery.
- We will continue to ensure, through the recently established NRM Transformation Programme, that **victim identification and support processes enable effective data collection and analysis**.
- We are currently undertaking user research, engaging directly with survivors, to better understand their recovery needs and their experience in the NRM. As part of this research, we hope to reach out to survivors who have already received their positive Conclusive Grounds decisions, including those who have already exited the NRM, to **gain an insight on survivors' experiences** as they start reintegrating into local communities.

We will continue our work to strengthen our data and implement this recommendation by **Winter 2020**. This will include working with the Modern Slavery Policy and Evidence Centre and the wider modern slavery sector to encourage further research into longer-term outcomes for victims.

**5: PAC recommendation:** *Within six months, the Department should write to the Committee setting out what actions the competent authorities are taking to reduce the time potential victims wait for a decision, and how the reformed NRM will reduce decision making times further, including what the target time for a conclusive decision will be.*

**Target implementation date:** Spring 2020

**Original implementation date:** Spring 2019

**Work to reduce waiting times continues to be implemented, however, the challenges regarding decision making timescales are now being addressed as part of the recently established NRM Transformation Programme.** This programme will deliver a series of sequenced changes to optimise the current delivery system in order to bring decision-making timescales down, and to consider more fundamental changes to how we identify and support victims of modern slavery.

Key actions taken to date include:

- A new **Single Competent Authority (SCA)** was launched on **29 April 2019** to handle all NRM cases and provide high quality, timely decisions for victims.

- In August 2019 a **new digital referral form was launched** to make it easier for those on the front line to refer victims, and in January 2020 the digital case-working element of the system came online. This system has already transformed how all the caseworkers in the SCA do their jobs and has helped them **make decisions much more efficiently for victims** by reducing duplication of information, improving data sharing and supporting a more streamlined decision-making process. Continuous Improvement experts have also analysed, recommended and implemented improvements to the current NRM processes to create efficiencies within the system.
- There has been an unprecedented increase in the number of potential victims of modern slavery being referred into the National Referral Mechanism. In 2019, 10,627 potential victims of modern slavery were referred to the NRM; a 52% increase from 2018. In response, **we have surged resource into caseworking teams to ensure victims receive the decisions they need to access tailored support as quickly as possible**, when they need to do so. Wherever possible, we make initial decisions on referrals within five working days to enable vulnerable victims to access support quickly and in line with their needs.
- The Home Office has **increased the number of caseworkers working on NRM decisions and is continuing with plans to further increase this going forward**. A clear objective of the work in this area is to create a sustainable system which can handle the large increases in referrals seen in recent years. This will be achieved through optimisation of the current system as well as longer term transformation.

While the NRM Transformation Programme will address this work, we will write to the Committee providing further details of the specific arrangements being put in place to reduce decision-making times in the shorter term by **Autumn 2020**.

**6: PAC recommendation:** *The Department should, as a matter of urgency, put in place care standards for the current victim care contract. It should also contract for, or put in place itself, an inspection regime to ensure that all care reaches these standards.*

**Target implementation date:** Autumn 2020

**Original implementation date:** Spring 2019

**The Department has made significant progress in implementing this recommendation and we will have completed this by Winter 2020.**

To ensure that there are set care standards in place, the Home Office:

- **Has worked with the Care Quality Commission (CQC) to develop a framework based on CQC's five key lines of enquiry to assess the quality of support provided to victims in** England and Wales who are supported through the Victim Care Contract. This framework was developed with the input of stakeholders and support providers in the current Victim Care Contract and support providers interested in bidding for future contracts. In Autumn 2019, the Department and CQC piloted inspections based on this framework within the current MSVCC. This framework is now complete.

- The Home Office is currently working to **embed this regime in the new MSVCC**, with the intention to begin inspections as soon as the contract goes live in Winter 2020. An inspection regime will enable the Department to ensure accommodation provided through the Service, and the related support, is appropriate. The inspection regime will also inspect Outreach Services to ensure quality and consistency of provision.
- The MSVCC has been drafted to ensure that the Supplier must comply with the inspection regime and engage collaboratively with inspectors. The Home Office's inspection regime supplier will **provide individual reports for each accommodation and outreach inspection and will publish an independent annual report** summarising the overall findings on MSVCC support.

As further detailed above, the recommended inspection regime will be implemented from **Winter 2020**.

**7: PAC recommendation: *The Department needs to work with the National Crime Agency, the Crown Prosecution Service, the Independent Anti-Slavery Commissioner, Police and Crime Commissioners, local police forces and local authorities to urgently develop a set of clear, practical steps and good practice guidance to understand why there are regional variations in tackling the issue and how these can be reduced.***

**Target implementation date:** Spring 2020

**Original implementation date:** Spring 2019

**The Department has made significant progress in implementing this recommendation and we will have completed this by Winter 2020.**

The Home Office has undertaken extensive work with forces and cross-Government partners to standardise crime recording, for example:

- Work with forces resulted in the **introduction of a standardised form** to remove local variation in interpretation of crime recording standards. This will ensure greater confidence in crime statistics in the future.
- The Department continues to work with the NCA and NPCC Lead for modern slavery to **encourage a consistent approach across all police force areas**. Crown Prosecution Service (CPS) Area leads have been tasked with working more closely with local police forces to identify methods to drive referrals, including through review of performance data to pinpoint where support may be required.
- The former Modern Slavery Police Transformation Unit (MSPTU) supported police forces and Police and Crime Commissioners in **sharing good practice**. This included utilising Modern Slavery Coordinators based in Regional Organised Crime Units to provide specialist expertise in investigations and prosecutions. An aide memoire on initial actions that should be taken has been distributed to over 55,000 frontline officers and **twenty forces now have dedicated resource to respond or coordinate the response to modern slavery**.

- The MSPTU also produced and disseminated **guidance on effective investigations**, including sharing lessons learned to improve the quality of police investigations. In addition, the MSPTU undertook research to look at police force structures to identify gaps in the response and have provided forces with **recommendations on where improvements can be made to align the national response** and reduce force variations.
- The Home Office continues to **engage regularly with the Independent Anti-Slavery Commissioner and the Anti-Slavery Coordinator for Wales** to ensure that Government is held to account and delivers a comprehensive, joined up modern slavery response. For example, we facilitate quarterly meetings with the Devolved Administrations to ensure good practice is shared across the UK.
- This year the NCA has invested resources to set up a Slavery and Trafficking Targeting Centre to support efforts to **build a more efficient and coordinated operational law enforcement response** to modern slavery.

We will work to finalise the implementation of this recommendation by **Winter 2020**, at which point we will also be able to review the progress of the Slavery and Trafficking Targeting Centre.