

# Home Affairs Select Committee inquiry into modern slavery

A written submission from the Chartered Institute of  
Environmental Health

September 2018

About the Chartered Institute of Environmental Health:

As a **professional body**, we set standards and accredit courses and qualifications for the education of our professional members and other environmental health practitioners.

As a **knowledge centre**, we provide information, evidence and policy advice to local and national government, environmental and public health practitioners, industry and other stakeholders. We publish books and magazines; run educational events and commission research.

As an **awarding body**, we provide qualifications, events, and trainer and candidate support materials on topics relevant to health, well-being and safety to develop workplace skills and best practice in volunteers, employees, business managers and business owners.

As a **campaigning organisation**, we work to push environmental health further up the public agenda and to promote improvements in environmental and public health policy.

We are a registered charity with 8,000 members across England, Wales and Northern Ireland.

Any enquiries about this response should be directed to:

Tamara Sandoul  
Policy Manager  
Chartered Institute of Environmental Health  
Telephone 020 7827 5822  
Email [t.sandoul@cieh.org](mailto:t.sandoul@cieh.org)

## **Modern slavery and environmental health**

Our members work as part of environmental health teams within local authorities as well as within businesses to enable compliance. Proactive work on modern slavery is largely led by the police working in partnership with local authorities. Local authority environmental health teams inspect a variety of premises in order to do routine inspections for the purposes of regulation and in order to investigate complaints from the members of the public. Places visited by environmental health professionals include:

- residential premises, including privately rented accommodation and caravan sites,
- business premises, including nail bars, car washes and warehousing
- food premises, including manufacturing and retail
- any premises in relation to noise and nuisance complaints

All of the above could potentially reveal instances of modern slavery. Environmental health professionals working within a business, would usually do so in a compliance capacity. They may have oversight of business operations and safety, which should include managing supply chains and ensuring that occupational health and safety standards are being upheld.

To inform this submission, we have heard from our members and the wider environmental health community about a number of projects they have been involved in to tackle modern slavery.

### **Key points made in this submission**

- There should be a national helpline to aid the reporting of instances of modern slavery, for both members of the public and any professionals who have concerns.
- Local authorities should ensure that adequate resources are being made available to officers working in health and safety and occupational health, to enable them to do proactive visits to small businesses. The number of proactive visits have been rapidly declining over the past decade, which may be reducing the ability of officers to spot instances of modern slavery in the workplace.
- Close working and sharing of intelligence between police and local authority housing and environmental health teams seems to be a successful formula for discovering and tackling instances of modern slavery effectively.

### **The current scale and nature of modern slavery**

Modern slavery can take place anywhere in the country however, according to reports from our networks, it seems to be very prevalent in certain industries or types of premises. Modern slavery is typically uncovered in caravan sites or travellers' communities, within food premises, hand car washes, nail bars and in warehouses or illegal Houses in Multiple Occupation (HMOs).

One council has been involved in three separate raids on one travellers' site. Whilst modern slavery is often associated with recent migrants from Europe or further afield, there are also some instances of slavery associated with British citizens, where gangs and organised crime are involved.

Our members tell us that criminal activity is often concentrated in the same places: *"I have been in position to share intelligence with our Police and Border Force colleagues and, our Trading Standards teams. This intelligence may include information in relation to child exploitation as well as slavery, and the sale of other illegal goods. Such criminal activities are often all linked."*

The scale of modern slavery is still likely to be vast, despite recent efforts. Whilst some progress is being made, usually led by the police, to rescue victims of slavery, the signs are often difficult to spot. One environmental health professional (EHP) describes how her suspicions were alerted: *"He wasn't young and my awareness was raised when I saw food in his room realising if you are not allowed a meal during your shift, in a takeaway, something is definitely wrong."*

### **The impact of the Modern Slavery Act 2015**

The Modern Slavery Act is seen by most as a very positive addition to the powers that police have in dealing with these types of offences.

Many of the EHPs that contributed to this submission have received some kind of grant funding, such as from the Migration Fund. It is likely that there are other local authorities who have been less proactive due to limited local resources to focus work in this area. One EHP told us specifically that *"the biggest challenge for the Council is resourcing this type of work. I do not exaggerate when I say that I could employ officers full time working on this issue at this site alone, therefore our ability to tackle an issue like this on a wider basis is limited."*

Some of our members have told us that the Modern Slavery Act 2015 does not go far enough when it comes to making businesses accountable. It requires businesses with a turnover of £36m or more to adopt a statement and other measures to ensure that there is no modern slavery in their work or supply chain. One EHP told us: *"My thoughts are that a turnover of £36 million to produce an anti-slavery statement is too high. It should be much more encompassing of smaller businesses."* Another EHP told us: *"Most of the businesses we deal with are SMEs and awareness of any legal requirement, let alone Modern Slavery Act, in the non-compliant businesses, is exceedingly poor."*

Joint operations between the police and other agencies can ensure that all criminal activity related to modern slavery can be tackled by using a variety of powers available to different agencies. One operation in Leicester was done jointly with the police and the Border Agency, to investigate car washes in the area. Significant health and safety at work offences took place and formal action was taken by the local authority, where this was appropriate. Border Agency and police also took action. The combined effort ensured that everyone involved was prosecuted.

### **How to increase understanding and reporting of modern slavery offences**

There are a number of ways that the understanding and reporting of modern slavery can be improved, from the point of view of the environmental health profession. More public awareness is needed via all media and social media channels and one simple number for the public to report concerns.

The message coming consistently from our networks is that there needs to be one easy reporting mechanism and more joint working between different agencies. A national helpline to aid the reporting of concerns, from both members of the public as well as various professionals, should make the reporting of modern slavery easier for everyone. One EHP told

us that she could not immediately report her concerns to the police and the delay could contribute to victims being moved to different premises. *"What I would say is that when I left the business, the desk service at the local police station was closed. Reporting this issue was difficult. I then drove to the police station in the main town and nobody was available, an appointment was made for me the following morning. A national helpline would have been better or an email address to send evidence in. The police did attend, the gentleman was removed but the delays mean people disappear."*

There are also some areas that we feel might present a potential risk for the future, such as the reduced capacity within local authorities to effectively discharge their health and safety duties. We know that due to financial pressures within local authorities in recent years, the number of proactive health and safety inspections at many local authorities have been reduced, thereby potentially limiting the ability of officers in discovering instances of modern slavery at a workplace or business. This is especially significant as local authorities have responsibility for regulating health and safety in the vast majority of smaller business and work premises in their areas, including car washes, nail bars, restaurants and some warehousing. Victims of modern slavery or exploitation are often fearful of contacting the authorities. It is therefore vital that local authorities continue to fund health and safety focused posts locally and continue to invest in unannounced proactive visits to small businesses in order to uncover hidden criminality and slavery. The recent APPG on Occupational Safety and Health report *Local Authorities and health and safety* explores the issue of reduced capacity for health and safety at a local level in more detail.<sup>1</sup> We would be keen to see a renewed focus on this important role in regulating health and safety, which also happens to play a key part in uncovering modern slavery.

Identifying and tackling instances of modern slavery is dependent on good structures being set up locally to share intelligence and information between local authority environmental health, housing, trading standards and the police. Regular meetings to share information aids the building of relationships locally and means that different regulators invite each other on joint raids or inspections and are also using the best tools available to be able to gather necessary evidence for prosecution.

An EHP from Fenland DC told us that it can sometimes be tricky to find the best way to be able to prosecute someone for exploitation. Police can only prosecute under the rules of the Modern Slavery Act 2015 but exploitation of people can fit into a grey area, where for example, a person is being controlled by another, by finding the victim work, housing and controlling their bank account.

Local authorities housing teams will also be at the forefront of discovering instances of modern slavery. Victims often live in overcrowded housing being sub-let by a gang master. Increased targeting by housing teams might therefore also help to uncover instances of exploitation. *"On a more 'grass roots' level, here at Derby City Council the Housing Standards Team are regularly tasked with accompanying a multi-agency team to identify properties where the tenants may be subjects of modern slavery or to commercial premises, where there may be living accommodation attached to that business. Occasionally we come across tenants who are involved in modern slavery through being found jobs and accommodation that is tied to their employment."*

Furthermore, increasing understanding could come from tailored case studies and training that is relevant to EHPs. Whilst this has happened in many areas, not every professional whose job involves them being out in the community has had specific training.

---

<sup>1</sup> [Local authorities and health and safety](#), APPG on Occupational Health, July 2018.

## **The impact of 'county lines', and how this issue can be tackled**

'County Lines' is a term used by police that refers to a strategy employed by large gangs, which recruit young or vulnerable people in an area, using 'cuckooing' (using the victim's home to deal drugs). The links between private sector housing teams and the police are important to ensure that any suspicious activity picked up by housing officers on routine visits are relayed to the police for follow up. In Northampton, the private sector housing team work closely with the police as part of a Cuckooing Task Group and the private sector housing intelligence feeds into this work in order to disrupt these activities and crime networks. A combination of powers from the two partners are used to take formal action.

Furthermore, public awareness should be raised about what to look for and how to report any suspicious activity from a neighbouring property.

## **What success in tackling modern slavery would look like, and what benchmarks should be used to measure progress**

Success in tackling modern slavery has to lie in joint working and joint operations between different agencies. Numbers of prosecutions using Modern Slavery Act powers could be used as a benchmark to monitor ongoing progress.

We would also recommend that an informal review might be helpful to assess the effectiveness of the legislation itself. For example, this could happen in asking police and other agencies of any gaps or loopholes they have become aware of during operations to deal with modern slavery in practice.

## **Current levels of support for victims, and how it can be improved**

Most of our members are not directly involved in providing support services for victims of modern slavery. However, some environmental health professionals working at a more strategic level in the local authority have some experience of this.

*One EHP working for a local authority told us that "our support was intense and continual until [the victims] moved on to more permanent housing away from our area. Those that moved away were not supported enough or for long enough. Those that stayed in our LA area received ongoing support and assistance ongoing today and have rebuilt their lives." This highlights the variations in standards, preparedness, availability of support services and coordination between different local authority areas."*

## **How the police and immigration system's response to modern slavery offences could be improved**

Police are leading work on modern slavery and are the lead agency to use the powers in the Modern Slavery Act 2015. They also operate over a larger jurisdiction than local authorities and therefore have an important role to play to in bringing all the agencies and intelligence sources together. We have heard about some very good examples of joint working and sharing of intelligence locally, which is having a positive effect on uncovering instances of modern slavery and a host of other criminal activity. We would support a much closer working relationship between local authority housing teams and the police. For example, the police should establish joint regular meetings with all local authority leads in their areas and ensure they have relevant environmental health and housing representation at these meetings.

## **What the priorities for the new Independent Anti-Slavery Commissioner should be**

We would like to see the Commissioner concentrating on raising public awareness of emerging types of exploitation and the signs to look for. The development of a national helpline would aid this.

The commissioner should also ensure that all organisations and partner agencies are involved in joined up working. For example, obligations could be placed on each organisation by the Home Office so they fully understand their roles and responsibilities. Nominated leads within each organisation could also help to improve joint working

Staff from the public sector should have a better understanding of modern slavery with training provided by experts. Even the call centre staff at a council should be made aware of any suspicious signs and how to report them within the council.

### **To inform this submission, we have received information from environmental health professionals working at the following councils:**

Bolsover District Council & North East Derbyshire District Council  
Central Bedfordshire Council  
Derby City Council  
East Hampshire District Council  
Hastings Borough Council  
Leicester City Council  
London Borough of Islington  
Northampton Borough Council  
West Lindsey District Council  
Wiltshire Council

Whilst it has not been possible to distil all the case studies and information we received from our environmental health networks, if the Committee would be interested in finding out more information, we would be happy to put them in touch with the relevant leads at these councils.