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Your Ref:

Our Ref: 128.20



**POLICE
SCOTLAND**

Keeping people safe

POILEAS ALBA

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Dear Mr Finnie,

Human Trafficking for Sexual Exploitation

I refer to your letter of 22 December 2020, requesting details of the work that Police Scotland is doing in liaison with partners, both nationally and internationally, to identify victims of human trafficking and exploitation and to bring the perpetrators of these crimes to justice.

Having considered the request, I offer the following by way of comment.

At the inception of Police Scotland in 2013, a National Human Trafficking Unit (NHTU) was established within the Specialist Crime Division to provide an overview of human trafficking and to manage the National Referral Mechanism (NRM) allocated for investigation in Scotland. The NHTU supports local policing activity, engages with partners in terms of the Scottish Government Strategy on Human Trafficking and develops policy and strategy in this business area. Over the past 8 years, given the significant increase in instances and complexity of human trafficking and exploitation, the NHTU has expanded to incorporate a dedicated investigative capability, overseen by a Detective Superintendent. The NHTU is also supported by the Human Trafficking Threat Desk, a specialised intelligence function which provides monthly reports focusing on exploitation types, victim analysis, emerging trends and strategic intelligence requirements.

Additional officers are seconded to assist and bring specialist skills to particular investigations as required.

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This has included police officers with linguistic skills, intelligence analysts, cybercrime and financial specialists. NHTU forms part of Public Protection business area of Specialist Crime Division and supports police officers, specialist investigators and a network of Human Trafficking Champions located across the 13 territorial policing divisions in Scotland. The above structure supports a localised threat and intelligence lead response to human trafficking and exploitation across the country.

As previously mentioned, Police Scotland are active participants in all Action Areas of the Scottish Government's Human Trafficking Strategy and lead in Action Area 2. Police Scotland work in a collegiate manner with other statutory bodies, agencies and third sector partners in Scotland to achieve the aims of identifying perpetrators and disrupting their activity. Despite the challenges of the Covid-19 pandemic, quarterly meetings of the strategic and tactical partners groups continue to be held remotely via Microsoft Teams. Police Scotland gather and share information from the group in a monthly briefing which includes partner's updates, emerging trends, guidance and news of current investigations. The briefing was devised at the beginning of the Covid-19 lockdown period as a method of drawing together scarce resources in terms of intelligence and information on the rapidly evolving situation and as a means of communicating intelligence requirements to inform a joined up response to identifying victims and pursuing perpetrators.

Police Scotland regularly liaise with national and international law enforcement agencies and third sector partners on matters of human trafficking and exploitation and organised immigration crime. UK Police Forces meet monthly via the Modern Slavery Organised Immigration Crime and Modern Slavery Intelligence Investigation Groups, Police Scotland is represented at these groups. The former group also co-ordinate Project AIDANT which is a European Multidisciplinary Platform against Criminal Threats (EMPACT). This saw Police Scotland undertake 5 themed periods of enforcement intensification in 2020 targeting Adult Services Websites, Labour Exploitation in the Food Packaging, Processing and Shellfish Sectors, Labour Exploitation in the Agriculture, Food Processing and Recruitment Sectors, Child Trafficking and Illicit Criminal Finances linked to human trafficking. Project AIDANT activity in Scotland in 2020 saw 20 Potential Victims of Trafficking (PVoT) identified, 5 NRMs submitted, 146 sites/premises investigated, 8 arrests and the initiation of 6 new investigations.

As a result of the global pandemic, 2020 saw unprecedented global challenges which had a direct impact on the human trafficking and exploitation picture in Scotland. Threat assessments from the Modern Slavery Police Transformation Unit and Human Trafficking Threat Desk assessed that Covid-19 and the UK leaving the European Union would effectively make victims of human trafficking and exploitation less visible. Threat assessments also identified that PVoT may be moved into labour exploitation in agriculture, food processing and fishing as traditional industries such as nail bars and car washes closed due to government restrictions.

In response to these assessments, Police Scotland instigated the following:

- External communications via the Scottish Business Resilience Centre (SBRC) to those involved in food supply/delivery and retail chains reminding them to undertake due diligence when hiring workers or agency staff and recognise the signs of potential human trafficking or exploitation. This reached an audience of businesses with a total staff compliment of around 1.4 million.

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- Liaison with Gangmasters Labour Abuse Authority (GLAA) to seek information and intelligence in respect of impact of Covid-19 on PVoT involved in labour exploitation and to flag concerns over potential exploitation stemming from use of agencies without adequate oversight and due diligence checks due to the speed and nature of their needs. 3 joint visits to premises of concern were also undertaken with GLAA. No crimes were identified and advice and guidance was issued to employers.
- Daily liaison with UK Border Force and Home Office Immigration Enforcement to assess change in travel numbers/trends of people travelling into Scotland from source countries.
- Operation ENCOUNTER- Daily assessment of available intelligence submitted via the Scottish Intelligence Database.
- Regular liaison with the Modern Slavery Human Trafficking Unit of the National Crime Agency Vulnerabilities Command to maintain a current picture of the wider UK and International picture and developments to inform the current threat.
- Liaison with divisional human trafficking champions requesting proactive work undertaken locally to widen intelligence gathering.
- Liaison with support services TARA and Migrant Help to utilise their involvement with PVoT within the National Referral Mechanism process.
- Establish from Scottish Local Authorities (COSLA) and Environmental Health Teams information available regarding houses of multiple occupancy. COSLA distributed a briefing produced by Police Scotland to the Chief Executives of all Scottish Local Authorities who then disseminated to local Housing Officers.
- Engagement with Police Scotland Safer Communities to liaise with homeless services and charities to be aware and mindful of PVoT using their services.
- Engagement with Police Scotland Rural Community Policing Teams and task them with visiting businesses to ensure Covid-19 guideline compliance and to ascertain their knowledge and make intelligence requirements.
- Request via appropriate landlords associations regarding concerns with occupancies and knowledge of what their premises are being used for.
- Regular distribution of the fortnightly Partners Covid-19 Briefing Paper
- Execution of Operation PERCEPTIVE which directly targeted labour exploitation in the Agriculture, Forestry and Fishing sectors. Officers visited over 50 premises, covering more than 5000 staff and gathering information on 26 Gangmasters to seek out PVoT and potential exploiters. 3 follow up multi-agency visits in association with the Gangmasters Labour Abuse Authority resulted. The visits also served to improve the intelligence picture around labour requirements, sourcing and human trafficking indicators.

The above actions helped to maintain the profile of human trafficking and exploitation in Scotland and informed the collective response to the unfolding situation.

From an international perspective, Police Scotland secured the secondment of Romanian Police Officers in 2018, to the NHTU in order to tackle the threat from Romanian Crime Groups assessed to be involved in human trafficking and exploitation.

Since 2014, Vietnamese nationals have been the most frequently encountered PVoT in the NRM in Scotland.

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This trend continued into 2019 where 222 cases (39%), more than a third, of the 563 NRM referrals processed by the Police Scotland's NHTU referred to Vietnamese nationals. In 2020 there were 104 cases (25%) of the 415 referrals, 10 of those reported sexual exploitation either on their journey to or within the UK.

To help address and understand the reasons for Vietnamese nationals being the most frequently PVoTs encountered in the National Referral Mechanism (NRM) in Scotland, 2 Vietnamese Police Officers were seconded to Police Scotland for a 6 month period following detailed considerations and discussions between Police Scotland, the Foreign and Commonwealth Office (FCO), the Home Office (HO), National Crime Agency (NCA) and the Vietnamese Ministry of Public Security over an 18 month period. The secondment builds upon the 2018 Memorandum of Understanding between the United Kingdom (UK) and Vietnam on human trafficking that will allow for greater collaboration around supporting victims, intelligence sharing and prevention work. This secondment took on more significance following the deaths of 39 Vietnamese nationals found in a refrigerated lorry in Essex on 23 October 2019. The intention was to further deploy the officers throughout UK Law Enforcement Agencies including Essex police however the Covid-19 pandemic significantly curtailed these plans.

Police Scotland continue to pursue the perpetrators of human trafficking and exploitation across national and international boundaries and have been involved in several joint investigation teams (JIT) with other European Law Enforcement agencies, Europol and Eurojust. A recent example of this is Operation Bear, a complex major enquiry targeting sexual exploitation for the purposes of prostitution of Romanian women. This investigation tackled a serious and organised crime group who were operating in Scotland, England and Romania.

An executive day of action on 9 September 2020 saw 23 addresses in Romania, 7 in England and a further 3 in Scotland entered by warrant. The action involved more than 130 UK and Romanian police officers deployed including members of Police Scotland's National Human Trafficking Unit, the National Crime Agency and Romanian Police's Directorate for Countering Organised Crime Trafficking in Human Beings Department. To date, 11 persons have been arrested in the UK for human trafficking and exploitation and related offences. 18 suspects have been arrested in Romania. The case has been reported to COPFS and prosecutors in Romania. The duration of the investigation and number of personnel involved demonstrates the complexity of cross border investigation of serious and organised crime groups involved in human trafficking and exploitation.

On 3 November 2020, Human Trafficking Action Area 2 partners met with international charity, International Justice Mission (IJM), to explore their work and ways that PVoT could be supported when repatriated to Romania. IJM have established a new office in Bucharest and this increases opportunities in the third sector for this area. This is particularly significant as many of the victims of trafficking for sexual exploitation reported in Scotland are Romanian females. Police Scotland and Justice and Care are currently in discussions looking at ways to improve victim engagement. PVoT and in particular those involved in prostitution are often reluctant to acknowledge that they are victims and do not wish to cooperate with law enforcement and support agencies. It is hoped that closer working with Victim Navigators will provide the confidence and support to PVoT and improve their outcomes.

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In 2020 Police Scotland capitalised on opportunities to highlight human trafficking and exploitation indicators, operations and intelligence requirements to businesses, the public, partners and their own officers over the past year. Activities included the following.

- In February 2020 journalists from the Daily Record accompanied police officers in Greater Glasgow on Operation Altercation which saw a number of raids on properties targeting sexual exploitation for prostitution.
- June 2020 saw Police Scotland issue media releases in four rural areas on the issue of labour exploitation in agriculture, fisheries and forestry and to highlight the work being done for Operation Perceptive. This was also picked up by national media including BBC Scotland News and the Daily Record.
- Social media channels were utilised in July 2020 for World Day against Trafficking with the NHTU giving an explanation of human trafficking and exploitation in Scotland.
- The executive day of action mentioned above for Operation Bear in September 2020 was widely reported in the media across Europe and generated significant interest from the public and partners. This resulted in a member of the public, who had legally purchased sexual services and thereafter suspecting that the sex worker had been exploited, reporting the circumstances of the purchase to the police quoting the media article.
- Anti-Slavery Day on 18 October 2020 saw the Minister for Community Safety Ash Denholm, ACC Judi Heaton and Bronagh Andrew from TARA provide interviews on human trafficking and exploitation which appeared on the STV, Daily Record and on social media. The Police Scotland Twitter account Tweet received over 5000 views and the Facebook post received over 14000 views. The Scottish Government also undertook a number of activities for Anti-Slavery Day including illuminating Edinburgh Castle and St Andrews House red.
- November 2020 saw reporting in the media of Operation Fasthold which saw 3 arrests around Glasgow for brothel keeping and human trafficking related offences. This coincided with the 16 Days of Activism for the abolition of violence against women and girls which focused on sexual exploitation on 1 December 2020.

Some of the media reporting as detailed above has yielded intelligence from the general public that has supported ongoing investigations

In 2020, Police Scotland also relaunched its intranet site for Police Officers and staff with new guidance and information on trafficking and exploitation. Anti-Slavery Day was highlighted on the main Police Scotland Intranet page as the headline banner for several weeks. Over 14000 officers have completed specialist training on human trafficking and exploitation.

The forgoing is a brief summary of the activities that Police Scotland and its partners have undertaken, locally, nationally and internationally, to identify the victims of human trafficking and exploitation and to bring the perpetrators to justice. There are a number of other human trafficking investigations that are ongoing across Scotland. The response has focussed on activities in 2020 and will form part of the submission to the Scottish Government Human Trafficking Strategy fourth annual review.

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I trust this information is of assistance.

Yours sincerely,

A handwritten signature in blue ink that reads "Judi Heaton". The signature is written in a cursive, flowing style.

Judi Heaton
Assistant Chief Constable
Major Crime, Public Protection & Local Crime

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