



Sandwell Modern Slavery Action Plan and Strategy 2023-2026



INTRODUCTION

Modern slavery is both a global and local problem which impacts on communities and individuals in different ways. Over the last 12 months work has been undertaken to improve the data and develop an understanding of how modern slavery is presenting in different parts of the community, and define the differing needs of victims and survivors, particularly in relation to gender and ethnicity.

Modern slavery requires local action to underpin international and domestic legislation and requires the community to work together to respond. Through the active partnership work taking place across Sandwell it has been possible to create a system-wide overview of modern slavery, ensuring that effective mechanisms are in place to prevent modern slavery, pursue those who perpetrate modern slavery, disrupt those locations where this occurs and to help to strengthen resilience in survivors.

The modern slavery delivery plan for 2022-2026 is formed as part of [Sandwell Community Safety Strategy](#), where modern slavery remains one of its core priorities. Work is directed through the following two sub groups:-

- Prevention of Violence and Exploitation (PoVE) where the focus is on preventing modern slavery and child exploitation.
- Reducing Reoffending, Offending and Serious Organised Crime (RRSOC) where the focus is on serious organised crime and County lines.

[Sandwell's Multi-agency Exploitation Strategy 2022 – 2025](#) covers all the domains of child exploitation which remains a priority area for the Sandwell safeguarding Childrens Partnership (SCSP), with the mandate and activities directed and progressed through the Child Exploitation Board (CEB).

The government have refreshed the [Statutory Guidance for Modern Slavery](#), this will be reflected in the action plan as we ensure we are working to a level of best practice.

The Local Government association has developed a new [Council guide to tackling modern slavery](#). This revised modern slavery guidance provides an overview of modern slavery and the UK framework for tackling it, providing specific targeted sections for officers working within different council services to help them understand their specific responsibilities.

To support the LGA's updated council guide to tackling modern slavery, the LGA has developed a [Council modern slavery maturity matrix](#). The matrix provides a framework for assessing progress and planning future activity on modern slavery.

THE MAIN KEY OBJECTIVES FOR THIS PLAN ARE:

Objective 1: Protect - strengthening safeguards against modern slavery by protecting vulnerable people from exploitation

Objective 2: Prevent - preventing people from engaging in modern slavery

Objective 3: Prepare - reducing the harm caused by modern slavery through improved victim identification and enhanced support

Objective 4: Prepare - prosecuting and disrupting individuals and groups responsible for modern slavery

<p>Objective 1: Protect - strengthening safeguards against modern slavery by protecting vulnerable people from exploitation</p>	<p>Objective 2: Prevent - preventing people from engaging in modern slavery</p>
<ol style="list-style-type: none"> 1. Strengthen our approach to supporting victims of modern slavery 2. Review and refresh victim pathway and safeguarding responses for victims of modern slavery 3. Work with the modern slavery and human trafficking regional board to adopt a public health approach to modern slavery 	<ol style="list-style-type: none"> 1. Continue to deliver a range of modern slavery training 2. Working collaboratively across different parts of the council involved in commissioning, procurement and contract management to ensure a consistent approach and understanding across the life-cycle of the contract 3. Continue to use effective communications channels to raise awareness of modern slavery
<p>Objective 3: Prepare - reducing the harm caused by modern slavery through improved victim identification and enhanced support</p>	<p>Objective 4: Prepare - prosecuting and disrupting individuals and groups responsible for modern slavery</p>
<ol style="list-style-type: none"> 1. Develop resettlement pathways for survivors of modern slavery resettling in Sandwell working towards trusted assessor status with the Salvation Army 2. Join up council-wide activity and supporting mechanisms through a joint action plan and strategy 3. Further develop the Slavery-Free Ambassador Programme 	<ol style="list-style-type: none"> 1. Continue to use data and intelligence to respond to modern slavery, understanding the picture or risk, threat of modern slavery 2. Continue to build on operational disruption activity and partnership working 3. Continue to lead on the modern slavery response through the strategic Anti-Slavery Partnership

OBJECTIVE 1: PROTECT - STRENGTHENING SAFEGUARDS AGAINST MODERN SLAVERY BY PROTECTING VULNERABLE PEOPLE FROM EXPLOITATION

THE KEY AREAS OF FOCUS TO MEET THIS OBJECTIVE WILL INCLUDE:

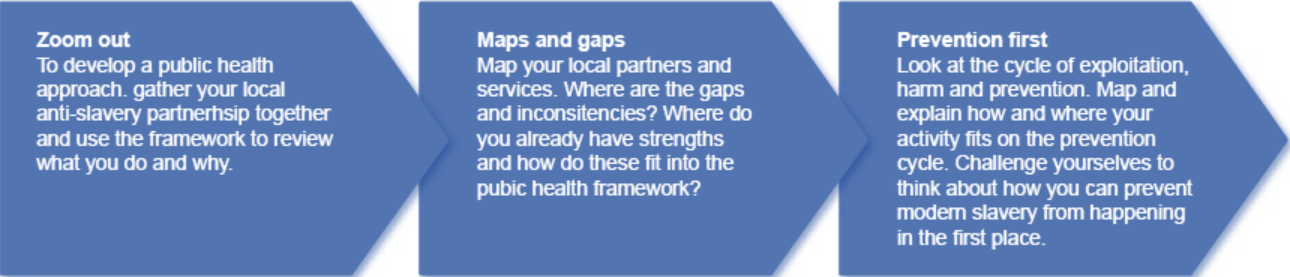
One of the main objectives that will run through every strand of this plan will be to strengthen the approach to supporting victims of modern slavery, the right support at the right time will be crucial and to ensure this is in place victim pathways need to be reviewed, refreshed and updated on the website, in training also to include professional development.

Work is ongoing with the Modern Slavery and Human Trafficking Regional Board to adopt a public health approach to modern slavery.

The [LGA guidance](#) and the work on serious violence recommends a review of the public health framework to consider how their work meets the principles set out in the local and service level factors.

[The guide for policy, strategy and local partnerships](#) suggests three steps to develop a public health approach, with supporting prompt materials and templates for each stage, see below :-

1. Strengthen our approach to supporting victims of modern slavery
2. Review and refresh victim pathway and safeguarding responses for victims of modern slavery
3. Work with the modern slavery and human trafficking regional board to adopt a public health approach to modern slavery



KEY PERFORMANCE INDICATORS AND MONITORING

- Victim pathways refreshed and published on modern slavery intranet and internet and within safeguarding processes.
- Monitoring and evaluation of resettlement pathways, building a key data set.
- Modern slavery strategy developed, communicated and published on internet.
- Data on SASCC cases and multi-agency meetings.
- Modern slavery maturity matrix completed.

STRATEGY	MILESTONES	LEAD AGENCY	LEAD OFFICER	DELIVERY DATE	UPDATE	RAG
1. Strengthen the approach to supporting victims of modern slavery	<ul style="list-style-type: none"> Use the LGA modern slavery guidance and maturity matrix to develop Cross-council coordination Build a Partnership-wide picture of activity on modern slavery Ensure multi-agency safeguarding arrangements have a clear strategy to tackle modern slavery for both child and adult victims 	SMBC	Wendy Sims Debbie Huxton And All partners	March 2025		
2. Review and refresh victim pathway and safeguarding responses for victims of modern slavery	<ul style="list-style-type: none"> Develop clear referral pathways for adult and child victims, taking a life course approach to modern slavery and exploitation Use the Human Trafficking Foundations slavery and trafficking care standards and Public health framework for modern slavery to adopt principles of working 	SMBC Sandwell Childrens Trust SSAB Adult social care WMASN VRP	Wendy Sims Debbie Huxton Andy Turvy Gillian Ming Deb Ward Rachel Cotterill Nick Walton Laura Isherwood	March 2024		

	<ul style="list-style-type: none"> • Further imbed the SASCC (Slavery and Adult Safeguarding Case Conference) 					
3. Work with the modern slavery and human trafficking regional board to adopt a public health approach to modern slavery	<ul style="list-style-type: none"> • Implement the LGA guidance on the public health approach to modern slavery • Review the public health framework to consider how Sandwell’s work meets the principles set out in the local and service level factors • Work with the anti-slavery partnership and the West Midlands Anti-slavery network to put the public health approach into practice 	<p>Anti-Slavery Partnership</p> <p>West Midlands anti-slavery partnership</p> <p>Police and Crime Commissioner</p>	<p>Wendy Sims</p> <p>Debbie Huxton</p> <p>Robin Brierley</p> <p>Harjeet Chakira</p>	March 2026		

OBJECTIVE 2: PREVENT - PREVENTING PEOPLE FROM ENGAGING IN MODERN SLAVERY

Preventing modern slavery is key. Good levels of analysis and mapping of modern slavery cases enable the partnership to target preventative and disruptive activity. Training and development is a large part of prevention, ensuring that all frontline workers understand the key indicators of modern slavery and how to effectively respond to these is crucial.

The [Skills for Care and Development: 'Training framework for the prevention, identification, support and care of victims and survivors of modern slavery and human trafficking'](#) provide an excellent basis to ensure training is aligned and targeted to the right audience.

Another key prevention strand is ensuring key services are working in collaboration, and are working together effectively to prevent modern slavery, protect potential victims, pursue perpetrators and disrupt locations.

Collaboration between the community safety partnership, statutory boards, the violence reduction partnership and police and crime commissioner are all key to preventative work. Sandwell anti-slavery partnership remains a best practice forum to share key work and ensure key partners and professionals can remain up to date with what works when preventing modern slavery.

Prevention activities and resources should be focused on informing and supporting those at risk to prevent modern slavery and reduce the levels of re-trafficking. Support and information should be readily available and offered in a timely manner to those who leave exploitation and those who might still be in exploitative circumstances. Safety and awareness resources including the helpline number, should be available in public places like parks and train stations so people know how to look out for those who might be targeting them.

KEY PERFORMANCE INDICATORS AND MONITORING

- Numbers of professionals trained with the number of training courses delivered.
- Annual review of modern slavery statement actively published online.
- Annual town profiles for modern slavery also presented at town tasking/borough tasking.

THE KEY AREAS OF FOCUS TO MEET THIS OBJECTIVE WILL INCLUDE:

1. Continue to deliver a range of modern slavery training
2. Working collaboratively across different parts of the council involved in commissioning, procurement and contract management to ensure a consistent approach and understanding across the life-cycle of the contract
3. Continue to use effective communications channels to raise awareness of modern slavery

STRATEGY	MILESTONES	LEAD AGENCY	LEAD OFFICER	DELIVERY DATE	UPDATE	RAG
1. Continue to deliver a range of modern slavery training.	<ul style="list-style-type: none"> Develop and Implement modern slavery training plan Launch a new E-learning programme to raise awareness of modern slavery across the LA and wider partners Regular modern slavery input with councillors and the champions for modern slavery 	SMBC	Debbie Huxton Louise Judge Wendy Sims	Ongoing		
2. Building collaboratively across different parts of the council involved in commissioning, procurement, and contract management to ensure a consistent	<ul style="list-style-type: none"> Imbed LGA guidance and maturity matrix for Commissioning and public procurement Ongoing revision and refinement of Modern Slavery transparency statement and 	SMBC	Wendy Sims Fiona McLaughlin	March 2026		

<p>approach and understanding across the life cycle of the contract.</p>	<p>associated policies and procedures</p> <ul style="list-style-type: none"> • Annual review of the modern slavery statement and publish on council website and on government website 					
<p>3. Continue to use effective communications channels to raise awareness of modern slavery.</p>	<ul style="list-style-type: none"> • Produce an annual modern slavery profile for each of the Sandwell Towns • Collate awareness raising materials in different languages for dissemination by frontline services • Develop a range of guides for professionals and update on website. 	<p>VRP SMBC</p>	<p>Debbie Huxton Wendy Sims Jo Tonks Dianne Gilbert Rameez Akhtar</p>	<p>Ongoing</p>		

OBJECTIVE 3: PREPARE - REDUCING THE HARM CAUSED BY MODERN SLAVERY THROUGH IMPROVED VICTIM IDENTIFICATION AND SUPPORT

Improving responses to victim identification is key, achieving this consistently across the whole council and wider partnership will help to raise awareness of the issue, and develop a clear understanding of the steps needed to take in respond.

The [statutory guidance](#) sets out the approach to supporting victims of modern slavery and principles of the MSVCC (Modern slavery Victim Care Contract) this is important that potential victims can be identified and the correct response put in place to enable victims to access the right support, this will include :-

- Access to Government funded supported through the MSVCC including accommodation, material assistance, financial support, translation and interpretation services, information, and advice.
- Outreach support if victims are already in safe and secure appropriate accommodation.
- Access to legal aid for immigration advice to return to their home country if not a UK national.
- Assistance with physical, psychological and social recovery, including appropriate and secure accommodation.

One of the key system changes is to build in sufficient time to their pathways and to work with victims in an appropriate way, not least to build trust and rapport that makes it less likely victims will disconnect with services. It is unlikely that a council (or any other first responder) could, within a few days, identify a victim, refer them into the NRM and secure a reasonable grounds decision while taking a trauma-informed approach that works sensitively with victims. There is a need to consider how victims' needs can be supported from the point at which they first come into contact with the authority, but before/until they are able to access NRM or other accommodation.

THE KEY AREAS OF FOCUS TO MEET THIS OBJECTIVE WILL INCLUDE:

1. Develop resettlement pathways for survivors of modern slavery resettling in Sandwell working towards trusted assessor status with the Salvation Army
2. Join up council-wide activity and supporting mechanisms through a joint action plan and strategy
3. Further develop the Slavery-Free Ambassador Programme

KEY PERFORMANCE INDICATORS AND MONITORING

- Key metrics around resettlement pathways
- Completed maturity matrix from key LA departments
- Number of training and awareness delivered to community groups
- Number of modern slavery champions/Slavery free ambassadors trained
- Engagement of different teams in modern slavery responses

STRATEGY	MILESTONES	LEAD AGENCY	LEAD OFFICER	DELIVERY DATE	UPDATES	RAG
1. Embed resettlement pathways for survivors of modern slavery resettling in Sandwell working towards trusted assessor status with the Salvation Army	<ul style="list-style-type: none"> • Further embed resettlement pathways for those exiting victim care contracts in Sandwell • embed pathway across BCWA, Salvation Army and Local Authority • Develop a resettlement tracker to review and monitor effectiveness of the pathway 	BCWA SMBC	Debbie Huxton Wendy Sims Mandy Amos Sara Ward	March 2023		
2. Join up council-wide activity and supporting mechanisms through a joint action plan and strategy	<ul style="list-style-type: none"> • Use the LGA guidance and maturity matrix across to review modern slavery activity across all LA departments • Ensure councillor champion for modern slavery is fully briefed on modern slavery work • Develop a council working group of operational leads to coordinate activity and develop cross-council 	SMBC – Community safety / ASC/ Housing / Regulatory/ environmental services	Wendy Sims Debbie Huxton Andy Turvy Sam Wandera Mandy Amos Tessa Mitchell Liz Nembhard Deb Ward Rachel Cotterill	March 2024		

	approach and processes to modern slavery					
3. Further develop the Slavery-Free Sandwell	<ul style="list-style-type: none"> • Develop 'Slavery-Free Sandwell' through continuing to raise awareness within Sandwell Council, with businesses and supply chains and with partners and local communities • Continue to give key messages to communities to help them to identify and respond to modern slavery. • Key updates and annual reports to report on progress. 	SMBC	Debbie Huxton Wendy Sims			

OBJECTIVE 4: PREPARE - PROSECUTING AND DISRUPTING INDIVIDUALS AND GROUPS RESPONSIBLE FOR MODERN SLAVERY

One of the key aspects of disrupting modern slavery will be coordination activity. This will continue to be facilitated through the Slavery and Human Trafficking Operational Partnership (SHOP), this enables a coordinated approach to be applied to every modern slavery concern. This means that we are able to adopt many preventative and early interventions to respond, for example: -

- Using housing regulations, renting laws and others to help reduce private homes being used as locations for exploitation.
- Use of key powers and Cease and desist orders can ensure early interventions are in place
- promoting the use of slavery and trafficking prevention orders (STPO) and slavery and trafficking risk orders (STRO).
- Undertaking short-term, targeted projects or programmes of work focusing on high-risk businesses in their local areas.
- Ensuring the right lead agency is adopted and fostering joint operations and investigations where required.
- following up modern slavery locations through delivering training and awareness and using reachable and teachable moments wherever possible.
- Using data and intelligence to respond to modern slavery, understanding the element of risk and what that looks like, the threat of modern slavery and target operations.

THE KEY AREAS OF FOCUS TO MEET THIS OBJECTIVE WILL INCLUDE:

1. Continue to use data and intelligence to respond to modern slavery, understanding the picture or risk, threat of modern slavery
2. Continue to build on operational disruption activity and partnership working
3. Continue to lead on the modern slavery response through the Strategic Anti-Slavery Partnership

KEY PERFORMANCE INDICATORS AND MONITORING

- Modern slavery dash boards
- Regular reports, analysis
- Deep dives at key meetings/forums and boards
- Key metrics of modern slavery referrals, responses and outcomes
- Anti-slavery partnership presentations and spotlight events
- Attendance at partnership meetings

STRATEGY	MILESTONES	LEAD AGENCY	LEAD OFFICER	DELIVERY DATE	UPDATES	RAG
1. Continue to use data and intelligence to respond to modern slavery, understanding the picture or risk, threat of modern slavery	<ul style="list-style-type: none"> Strive towards creating a shared set of modern slavery data across the partnership, and aim to build in modern slavery data collection across all relevant systems Develop a central corporate recording and reporting of NRM referrals and any modern slavery concerns/intelligence raised by council officers or services Undertake mapping and analysis of local trends and concerns to help target preventative and disruption activity 	SMBC	Wendy Sims Debbie Huxton	Ongoing		
2. Continue to build on operational disruption activity and partnership working	<ul style="list-style-type: none"> Develop an ongoing assessment of different disruption techniques and tools and most appropriate for each scenario 	WMP SMBC	Debbie Huxton Keeley Bevington Wendy Sims Gareth Hughes Jade Hibbert	Ongoing		

	<ul style="list-style-type: none"> Promote multi-agency planning meetings, debriefs and evaluation of disruption approaches and outcomes Continue to work with VRU and partners to take a regional approach to Operation Aidant, County Lines intensification weeks and NCA activity 					
3. Continue to lead on the modern slavery response through the Strategic Anti-Slavery Partnership	<ul style="list-style-type: none"> Maximise engagement in the regional modern slavery working groups and boards and support to develop approaches for working with councils/agencies on a cross-boundary basis Develop a forward plan of events to spotlight areas of modern slavery Recognise and celebrate good 	SMBC West Midlands Anti-Slavery Network PCC VRP	Wendy Sims Debbie Huxton Davina Woollery Nick Walton Harjeet Chakira Jade Hibbert Amy Cooper	March 2025		

	practice and use this to inform and educate professionals working inside and outside of the modern slavery arena					
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