

Trafficking and Exploitation Strategy

- Fourth Annual Progress Report

“ I am grateful to TARA service, they helped me a lot when I was in a difficult situation, gave me hope and made me smile. I don't want anything to change at TARA.”

“ I know now I can trust people, there is light at the end of the tunnel for me. I feel so blessed and I now feel like I have hope.”

“ I found Migrant Help support beneficial. You provided me with food, provided me with books and also helped me with financial support. FareShare food donations have been a great help.”



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Included throughout this progress report are illustrative examples of collaborative work in Scotland to address human trafficking and its impacts, as well as quotations from survivors of trafficking which have been provided via Migrant Help, Trafficking Awareness Raising Alliance (TARA) and The Anchor Service.

Foreword

Minister for Community Safety



Ash Regan MSP
Minister for
Community Safety

In 2017, we published Scotland's first Trafficking and Exploitation Strategy and in doing so set out a range of outcomes and actions to tackle this horrific behaviour. The development of the Strategy and subsequent implementation has been delivered through a process of partnership working across all Action Areas and the Child Trafficking Strategy Group. The publication of the fourth annual progress report highlights the collective effort of all Strategy partners.

We published a review of the Strategy last year, in line with our statutory duty, concluding that it remained fit for purpose in the short term and provided an effective framework for continuing improvement. This framework has been key to the progress made during the period of this report, as the challenges presented by COVID-19 have required significant flexibility from all partners in order to maintain support to victims and ensure an appropriate law enforcement approach to existing and emerging risks.

I want to thank all partners involved in delivering the Strategy for the progress they have made during this very difficult period. Some, but not all, of this work is set out within this report. Both Migrant Help and the Trafficking Awareness Raising Alliance have gone above and beyond to maintain support provision, reacting to changing circumstances and putting in place new operational models at pace in order to prioritise support and assistance. Similarly, Police Scotland responded to the challenges of COVID-19 proactively, delivering regular partner updates to share information, working with businesses to improve their resilience against labour exploitation and continuing to disrupt those who trade in human beings.

Looking forward, we know there is much more we can do to improve victim support pathways and rid Scotland of human trafficking and exploitation. We will look to encourage use of the National Referral Mechanism (NRM) toolkit amongst First Responder organisations and use our existing powers to mitigate the influence of wider changes that may affect victims of human trafficking and exploitation.

Section 1

Action Area 1 – Identify victims and support them to safety and recovery

Victims of trafficking endure unimaginable horrors and have been recovered in all areas of Scotland. Action Area 1 focuses on ensuring effective support provision for trafficking victims, empowering victims to seek support and assistance and on public and professional awareness of human trafficking.

Action Area 1 brings together key partners from across Scotland and beyond, meeting on a quarterly basis, chaired by COSLA.

Membership of the group includes:

- Convention of Scottish Local Authorities (COSLA)
- Crown Office and Procurator Fiscal Service (COPFS)
- Independent Anti-Slavery Commissioner's office
- Justice and Care
- JustRight Scotland
- Migrant Help
- NHS Greater Glasgow and Clyde (The Anchor)
- Police Scotland
- Public Health Scotland
- Scottish Business Resilience Centre
- Scottish Community Safety Network
- Scottish Government (human trafficking policy, homelessness policy)
- Scottish Guardianship Service
- Scottish Refugee Council
- Survivors of Human Trafficking in Scotland (SOHTIS)
- TARA (Trafficking Awareness Raising Alliance)

Looking back

The COVID-19 pandemic had a significant impact across all parts of our communities. Large numbers of people were made more vulnerable by the wider harms of the pandemic and regular methods of identifying and supporting victims were challenged. The impact occurred within the context of referrals to the National Referral Mechanism (NRM) in Scotland increasing significantly in 2019 and the third annual progress report set out the following areas for focus in 2020/21:

- Analysis of the factors and trends driving increased NRM referrals;
- Understanding the demographic groups driving referrals, and the internal and external factors behind this;
- Use guidance (such as the NRM toolkit) to develop local practice;
- Develop awareness of support services amongst victims and also within professional settings;
- Develop further policy interventions at local and national level that can strengthen the fight against trafficking and support victims, including in response to the COVID-19 pandemic and the UK's decision to leave the European Union;
- Consider how survivor engagement can be maintained and strengthened to facilitate direct contributions to local and national policy and decision making.

Further detail can be found within this chapter.



Key outcome: people who encounter victims understand signs, know what to do and have access to specialist advice and support

Providing professionals and the wider public with the necessary tools to recognise indicators of human trafficking and exploitation and understanding how to respond appropriately continues to be a key outcome. Victims may not recognise their situation as one of exploitation and may not seek assistance, for a number of reasons.

Developing public awareness is an ongoing process and media campaigns have been delivered by the Scottish Government and Police Scotland in previous years. In March 2021, Police Scotland launched a national campaign “**Break the Chain**” through a webinar hosted by the Scottish Business Resilience Centre (SBRC). The event featured speakers from the Modern Slavery Organised Immigration Crime Unit, Police Scotland, SBRC and Brightwork Recruitment. The campaign focused on labour exploitation and associated indicators and was supported by a dedicated webpage¹ where additional information was made available to businesses and the wider public.

The third annual progress report set out plans to explore the development of regional partnerships. Action Area 1 considered this model, which has proven effective in other parts of the UK in coordinating groups of local authorities,

police, health and other partners to focus more deeply on the particular issues of a local area.

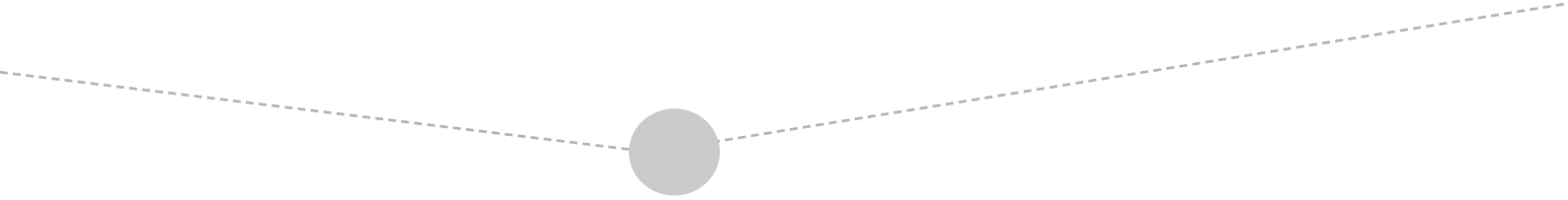
Following discussions with key stakeholders, the group, led by COSLA, decided that further consideration of a regional approach is required. Ensuring clear referral pathways are in place for potential victims of trafficking is vital and embedding the **NRM toolkit**² (see below) may provide an opportunity to explore this in practice. Action Area 1 will continue to reflect on a regional approach as the group explores more localised data across Scotland.

As noted in the third annual progress report, several Action Area 1 partners and First Responder organisations in Scotland met in early 2020 to commence work on the development of a NRM toolkit. The working group, led by TARA, continued to engage virtually throughout the pandemic.

The toolkit provides First Responder organisations and their frontline teams with the local and global human trafficking and exploitation context, the legislative framework, the purpose of the NRM, guidance on how to best complete an NRM referral and advice on what to expect once a referral is submitted. The toolkit also takes a trauma-informed approach to identifying vulnerable adults and children and provides helpful advice on how to provide a safe environment to encourage potential victims to disclose their experiences.

1 <https://endlabourexploitation.co.uk/>

2 <http://www.migrationscotland.org.uk/uploads/National%20Referral%20Mechanism%20Toolkit%20March%202021.pdf>



With the support of Glasgow City Council, the toolkit was developed in an interactive format, with a key focus on ease of use and being able to support frontline teams at their point of need. The toolkit launched via social media in March 2021 and was distributed to all local authorities in Scotland and throughout professional networks. However, publication of the toolkit is only the first step to embedding awareness of support pathways. It will be important to use the toolkit to develop local practice and process. The resource will be reviewed regularly and Action Area 1 will identify and agree any required updates in relation to the NRM process or to reflect Scotland's evolving response to the identification and protection of victims.

The third annual progress report noted that, in 2019, COSLA published guidance³ for frontline local authority staff and managers to support them in their local area. The pandemic has made clear that this guidance, while still appropriate, requires updating to reflect the changing circumstances of the last 18 months and to take into account the evolving demand for a sophisticated response. COSLA plan to review and update this guidance to ensure it meets the needs of local authority staff.

Referrals of UK nationals to the NRM from Scotland, while increasing, remain disproportionately low compared to trends in other areas of the UK. Led by COSLA, Action Area 1 has developed a working group which will assess available data and trends and consider what further information could be accessed to provide a more holistic picture of the scale and nature of the issue and inform future policy interventions within Scotland.

The Crown Office and Procurator Fiscal Service continues to apply the **Lord Advocate's Instructions** to ensure that victims of trafficking, slavery, servitude and forced or compulsory labour who have been compelled to commit criminal offences as a consequence thereof are not prosecuted. In response to the decision of the European Court of Human Rights in *VCL & AN v United Kingdom* the Lord Advocate's Instructions have been updated to make explicit that:

- Prosecutors should direct Police Scotland to refer all potential victims of trafficking or exploitation to the NRM (although for adults this is only possible if they consent to the referral) if not already done so; and
- Prosecutors should await the outcome of the NRM process, i.e. the Conclusive Grounds Decision, before making final decisions about prosecution of potential victims of trafficking or exploitation unless there is no alternative.

3 <http://www.migrationscotland.org.uk/resources/human-trafficking-exploitation-guidance>



The Lord Advocate's Instructions are complemented by a clearly defined structure to ensure consistency and expertise in decision making. When prosecutors suspect that an accused person may be a victim of trafficking or exploitation they are instructed to submit a report to the National Lead Prosecutor for Human Trafficking and Exploitation. Those reports address whether the test in the Lord Advocate's Instructions is met and what further steps are appropriate in light of that conclusion. The number of reports submitted to the National Lead Prosecutor has risen year on year since the implementation of the Human Trafficking and Exploitation (Scotland) Act 2015.

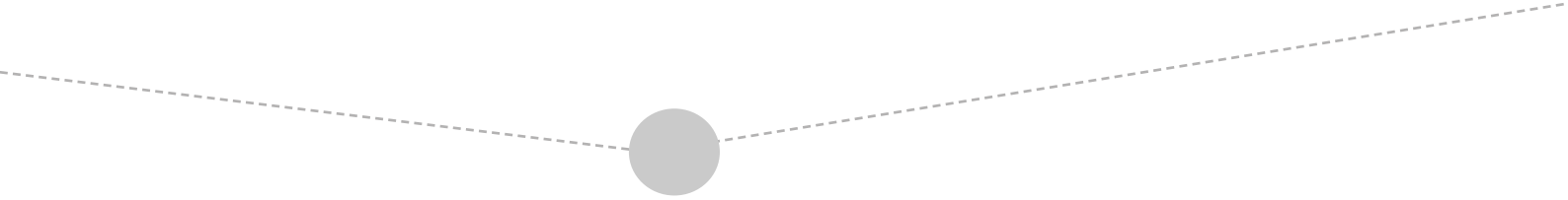
The National Lead Prosecutor, a highly experienced High Court prosecutor, carefully considers the facts and circumstances of each individual case and makes the final decision on whether the test in the Lord Advocate's Instructions has been satisfied. In cases in which the test is satisfied, the National Lead Prosecutor directs that "No Action" or "No Further Action" be taken by prosecutors. If the National Lead Prosecutor considers that further information is required before making a final decision, she may direct that the accused person be invited to apply to the court for bail, if he or she is remanded, pending the outcome of further inquiries.

Between 1 April 2020 and 31 March 2021:

- 48 cases involving 70 accused persons were reported to the National Lead Prosecutor for human trafficking for consideration of taking no action or discontinuing proceedings on the basis of the Lord Advocate's Instructions; and
- To date, no action or no further action was taken in respect of 7 of those accused persons on the basis that the test within the Lord Advocate's Instructions was met.

Training events during the reporting period were carried out virtually due to public health measures. Experience in early 2020 demonstrated an ability to take forward multi-agency sessions with national reach and with high levels of representation from more remote areas of Scotland. Attendees noted that online accessibility was a key enabler in attendance, with location previously a key barrier to participation due to time constraints and expense. It was noted that difficulties attending in-person events can lead to exclusion from professional networks and result in the underrepresentation of island and rural communities.

TARA produced a short paper reviewing their training offer, including consideration of a Scotland-wide approach. Following discussion across all Strategy implementation groups, a training group, drawn from each Action Area and the Child Trafficking Strategy Group, has been identified. The group will take forward analysis of



existing training/resources and consider the development of a strategic approach to training and awareness raising in this area.

Key outcome: coherent person/child-centred support process that enables victims to recover and build resilience

After identification, it is essential that specialist support and assistance is available to underpin victims' recovery from the physical, psychological and social harms that they may have experienced.

The Scottish Government provided support for victims of human trafficking and exploitation through continued funding of TARA and Migrant Help. TARA supports female victims of trafficking for commercial sexual exploitation, reflecting the particular impacts on this group of survivors, and Migrant Help supports all other adult trafficking victims.

As noted in the third annual progress report, TARA and Migrant Help received a significant uplift in funding for 2020/21 to reflect the increasing number of trafficking victims requiring support in Scotland and they will share over £1.4 million in 2021/22. The pandemic presented numerous challenges for both support providers as they maintained a 24/7 crisis response and ongoing support to clients. A system of rota-based office and home working was implemented to ensure that as a vital frontline service, clients continued to have access to essential services such as secure accommodation, food banks, crisis counselling sessions and access to staff when required.

TARA worked closely with numerous local and national organisations to ensure comprehensive support. TARA also provided vital telephone support and women have since expressed how important this was for their wellbeing, particularly during the most restrictive lockdown periods. TARA utilised donations from the Tumbling Lassie Committee to purchase televisions for very isolated women and their children, leading to improvements in wellbeing whilst in lockdown.

With the easing of restrictions in summer 2020 and growing concerns regarding women's social isolation, TARA arranged outdoor social events for service users and their children.

Migrant Help maintained their partnership with Brightwork Recruitment to provide employment opportunities to survivors of human trafficking and exploitation. Although many victims do not have the necessary status to work in the UK, Migrant Help have had notable success in supporting several clients into the workplace through their partnership with Brightwork, who have provided significant support. Accessing employment can be a major step in the journey of a survivor toward greater independence and improved overall wellbeing.



Access to digital technology

The early phase of the pandemic highlighted the difficulties in maintaining service provision while pivoting to a remote support model. Digital exclusion was a significant issue, affecting survivors supported by both TARA and Migrant Help. Devices were initially accessed through the Connecting Scotland Fund and following this, the Scottish Government worked closely with both organisations to ensure funding was available to purchase smartphones or other digital devices for all survivors. This helped to remove barriers to recovery and enable face to face communication between client and support provider.

Provision of devices has also facilitated remote psychological support delivered by The Anchor and access to online English for Speakers of Other Languages (ESOL) classes, which can play a vital role in assisting victims of trafficking to integrate within communities.

In early 2021, TARA conducted a retrospective snapshot survey with 52 clients. The survey aimed to capture women's views at various stages of the pandemic. This qualitative feedback demonstrated the provision of digital devices coincided with improved understanding of COVID-19 public health guidance, increased feelings of wellbeing and mood, reduced feelings of social isolation, and improved access to TARA and other support services.

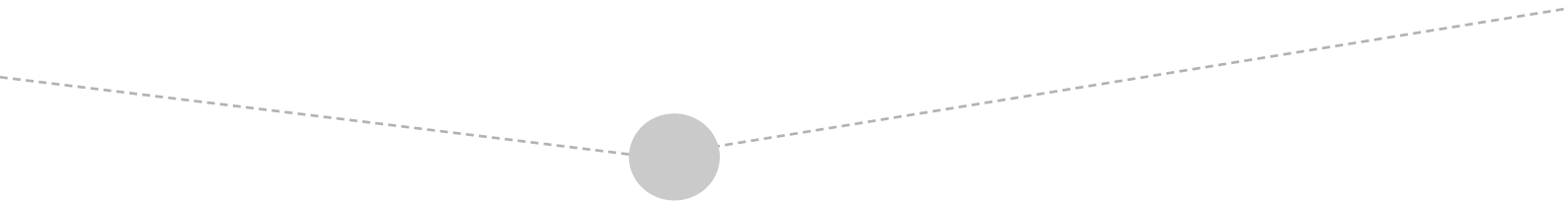
Access to digital devices also significantly improved TARA's response to the small number of women who decline access to their safe accommodation but require support and are staying outside of the Glasgow area. Strong relationships have been formed during periods of public health restrictions and TARA have been able to work with the Encompass Network or Violence Against Women Partnerships to ensure women are able to access local, in-person supports alongside TARA's specialist service.

Through Scottish Government funding, both TARA and Migrant Help continue to provide clients with digital devices.

In consultation with the Scottish Government, the Modern Slavery and Human Rights Policy and Evidence Centre⁴ has developed a research proposal which will assess the provision of such devices and help inform longer-term policy decisions.

“ When I arrived in Glasgow, I did not know anything and now I feel happier and safe. Thank you to my worker for all of your help/support and all of the staff at TARA.”

4 <https://modernslaverypec.org/>



The Scottish Government significantly increased support in 2021/22 for **NHS Greater Glasgow and Clyde Psychological Trauma Service (The Anchor)** to reflect the increase in referrals. The Anchor continues to provide psychological assessment, treatment and legal reports for adult victims, alongside regular consultation with TARA and Migrant Help. In response to the COVID-19 pandemic, The Anchor have adapted services to meet mental health needs. Psychological assessments continue to be offered alongside the delivery of safety, stabilisation and other trauma-focused psychological interventions. A range of methods have been deployed to deliver this support, including telephone appointments and videoconferencing.

The Anchor have also adjusted their psycho-education information session to make it suitable for video, including translating into different languages so it is accessible to a wide range of clients. Service users can watch online at a time that is convenient to them and then arrange an appointment with a clinician to discuss. Remote group intervention work has been successfully delivered.

Where an individual aged 16 and over is known or believed to be at risk of harm in terms of the Adult Support and Protection (Scotland) Act 2007, a referral should be made to the local authority or Health and Social Care Partnership. Where Health Boards, Councils, Police Scotland, Mental Welfare Commission, Healthcare Improvement Scotland, Care Inspectorate and the Office of the Public Guardian know or believe an adult is at risk of harm

they have a duty to report the facts and circumstances of the case to the local authority for the area in which it considers the person to be. The above public bodies have a statutory duty to make a referral when they know or believe an adult to be at risk of harm, but an Adult Protection referral can be made by any source. Where the person is 16 or 17 years of age, advice should be sought locally as to whether they should be referred in terms of adult or child protection. An adult is defined as being at risk of harm where they are:

- unable to safeguard their own well-being, property, rights or other interests;
- are at risk of harm; and
- because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected.

All three elements of the definition must be met.

In this context, an adult is at risk of harm if another person's conduct is causing (or is likely to cause) the adult to be harmed, or the adult is engaging (or is likely to engage) in conduct which causes (or is likely to cause) self-harm. This report will be shared with Adult Protection Committees to ensure they remain informed of human trafficking policy developments and to raise awareness with all partners of the potential connection between the two policy areas in practice.

As noted in the third annual progress report, JustRight Scotland participated



in a two-year EU Asylum, Migration and Integration Fund project “**ASSIST: Gender-Specific Legal Assistance and Integration Support for Third Country National Female Victims of Trafficking for Sexual Exploitation**”, which concluded in December 2020.

The project focused on the integration of trafficked women recovering from sexual exploitation, taking into account the gender dimension of trafficking in Europe and the gender-specific harms and trauma associated with trafficking for sexual exploitation. Legal advice was provided, alongside information and support in accessing material assistance (social and financial).

The project concluded with a national dissemination event where JustRight Scotland and key partners discussed the importance of focusing on medium to long term outcomes for those identified as victims of trafficking in Scotland and launched the Know Your Rights booklet⁵ as well as a Best Practice Report on Assisting Trafficked Women.⁶ Building on these resources, a suite of accessible **factsheets**⁷ for all adult third-country nationals who have experienced trafficking, covering a wide range of topics, such as identification of trafficking, immigration, compensation, legal, health, housing, education, and employment have been developed.

5 https://www.justrightscotland.org.uk/wp-content/uploads/2021/03/JRScot_leaflet_English-1.pdf

6 https://www.justrightscotland.org.uk/wp-content/uploads/2021/03/R1_JRScot_ASSIST_Report-FINAL.pdf

7 <https://www.justrightscotland.org.uk/learn-more/legal-factsheets/>

Action Area 1 has taken a strong interest in the proposals contained within the UK Government’s New Plan for Immigration and the Nationality and Borders Bill. The group will continue to focus on ensuring support processes in Scotland are accessible and victim-centred.

Key outcome: victims are aware of support and trust it enough to ask for help

Engaging victims of human trafficking and exploitation with support services can be a challenge given the nature of their experiences. Traffickers may utilise concerns about immigration status or other vulnerabilities to dissuade victims from seeking to exit their situation. Once identified, it is therefore vital for services to develop trust with victims so they feel comfortable reaching out to those who can provide help.

In March 2021, TARA coordinated the first meeting of their Advisory Group. The aim of the Group is to enable women’s views, lived experiences and expertise influence a range of issues including review and development of the TARA Service, policy and legal developments and other frontline responses.

Early legal advice remains a key intervention in supporting victim recovery. During 2020/21, **28 women** accessed the **legal advice clinic** operated by TARA and JustRight Scotland. Advice was provided on a variety of issues including entering the NRM, immigration and asylum, EU Settlement Scheme, Criminal Injuries Compensation and the criminal justice system.



TARA and JustRight Scotland legal advice clinic

Korina was trafficked to Scotland for the purposes of commercial sexual exploitation from an Eastern European country. Korina had just exited a situation of commercial sexual exploitation and was referred to the TARA Service in the autumn of 2019. Korina had co-operated with Police Scotland and was intensively supported by TARA in their crisis accommodation. However, she wished to return to her home country immediately.

TARA explained to Korina about the weekly legal clinic and arranged for her to meet with a lawyer from JustRight Scotland (JRS). At the legal clinic, Korina was given advice on her immigration position, return to her home country, the NRM, the criminal justice process and compensation.

Korina would not have received such wide-ranging holistic advice about her rights if the legal clinic did not exist or was not so accessible within TARA. It is unlikely she would have arranged an appointment with a solicitor to discuss these matters as her pressing concern was to return home. Even if she had, the capacity of solicitors and resultant waiting times for an appointment would have made this very difficult within the short window of time that existed in this case.

TARA also arranged for her to speak to an international specialist Non-Governmental Organisation so she could learn more about the support available on her return to Eastern Europe. Korina agreed to be referred to the NGO and TARA conducted a return risk assessment with her and Police Scotland and supported her to return.

JRS and TARA continued to engage with Korina after she left Scotland in partnership with a specialist NGO in her home country. JRS continued to provide advice and representation in relation to the NRM identification process, the criminal justice process and they submitted an application for criminal injuries compensation.

JRS proactively engaged with the NRM process, on Korina's behalf, to ensure that a decision was forthcoming. There was a risk that one would not have been made as she had left the UK. JRS and TARA also engaged with Police Scotland around this case, including the bail conditions of the accused and the return of property taken in evidence.

Korina received compensation in late 2020 as a result of her experiences. This was an important outcome because on return to her home country, her family disowned her and due to difficulties with the economic situation as a result of COVID-19, she was in a position of vulnerability again making the risks of further exploitation higher. The compensation Korina received was life changing, giving her the ability to obtain



longer term secure accommodation and have options for her future. It provides an opportunity for Korina to start again thus acting as a significant preventative measure. This would not have happened without JRS being able to meet her at the TARA legal clinic as well as being able to engage and work in partnership with TARA, Police Scotland and the international specialist NGOs throughout.

Migrant Help have continued their partnership with JustRight Scotland throughout 2020/21 to ensure **fortnightly legal clinics** were available for service users. The clinics initially provided clients with advice on compensation, but expanded to include a wider range of topics. Over 60 Migrant Help clients accessed the legal clinics and through Scottish Government funding the clinic will run weekly in 2021/22.

Survivors of Human Trafficking in Scotland (SOHTIS) is a Scottish charity committed to the recovery of victims of trafficking and the long-term wellbeing of survivors in Scotland. SOHTIS has **equipped approximately 500 frontline staff** in organisations who support vulnerable groups at risk of human trafficking, such as those accessing homeless accommodation, to identify potential victims. This has resulted in increased identifications enabling individuals to be brought to safety. During the pandemic SOHTIS developed crucial links with providers of emergency homeless accommodation improving victim engagement and carried out a partnership investigation into potential forced begging in Edinburgh.⁸

During 2020/21, SOHTIS assisted Local Authorities and other statutory services in the development of local human trafficking strategies and responses through “Project Light.”⁹

Research has shown that the journey from victim to survivor is one that few people are able to make alone and that long-term support is vital in ending the cycle of exploitation and preventing re-trafficking. SOHTIS launched Project Integrate in January 2021 with the aim of strengthening independent living, reducing vulnerability and empowering survivors to regain control of their lives. Acknowledging the transgenerational effects of human trafficking, the Project also includes a professional birthing year support service for women who are pregnant. SOHTIS has received 45 referrals to this service in the first three months of opening.

“ My favourite time was when I could attend the art class where I spent a good time and made a few friends. I cannot think of any suggestion regarding the support, everything was perfect.”

8 <https://sohtis.org/research/>

9 <https://sohtis.org/project-light/>



Looking forward

A key area of focus will be ensuring current resources are deployed as effectively as possible. That means refreshing and reviewing our guidance, training, learning and awareness raising resources, and targeting them more effectively. The rapid transition to remote working provided an effective way of communicating with a geographically dispersed range of professionals and this should be harnessed to expand the accessibility of learning opportunities.

Linked to this, Action Area 1 will play a key role in the development of a strategic approach to training and awareness raising, which will include representation from the other Action Areas and the Child Trafficking Strategy Group.

We will take forward a small working group to analyse a range of data sources, including those published by the Home Office in relation to Scotland. This group will look to identify trends or patterns to human trafficking and exploitation across the country and which may inform the development of a strategic training approach.

Action Area 1 will continue to assess the UK Nationality and Borders Bill, prioritising a victim-centred and trauma-informed approach to identification and support.

Section 2

Action Area 2 – Identify perpetrators and disrupt their activity

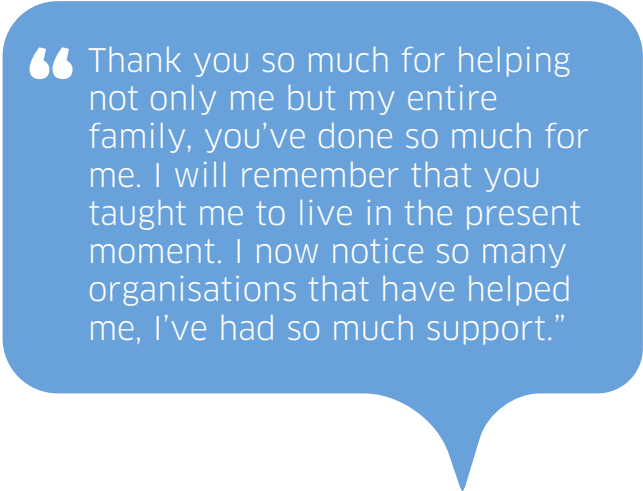
Action Area 2 focuses on the identification of perpetrators of human trafficking and exploitation with the intention of disrupting their criminal activity. Key areas of focus include contributing to the successful development of a duty to notify process for public bodies, the development of local, national and international intelligence sharing and utilising all available powers at the disposal of prosecuting authorities to bring offenders to justice.

In 2020 Action Area 2 membership was split into strategic and tactical groups to more effectively deliver key work streams. The strategic partners group includes representatives from:

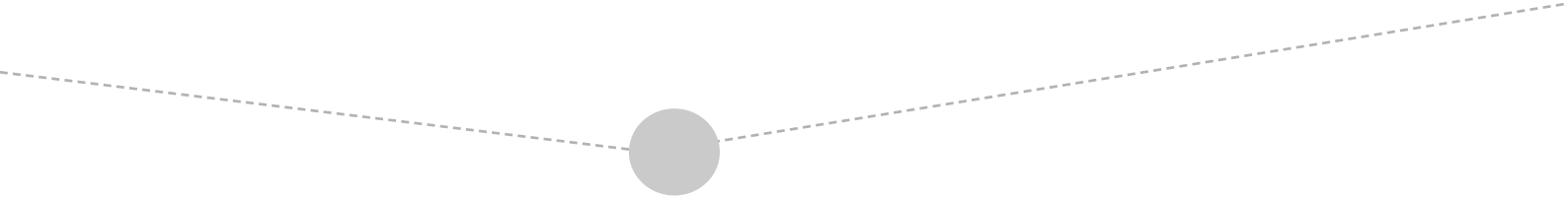
- Border Force
- British Transport Police (BTP)
- Convention of Scottish Local Authorities (COSLA)
- Crown Office and Procurator Fiscal Service (COPFS)
- Gangmasters and Labour Abuse Authority (GLAA)
- Glasgow City Council Health and Social Care Partnership
- Her Majesty's Revenue and Customs (HMRC)
- Home Office Immigration Enforcement (HOIE)
- Justice and Care
- Migrant Help
- National Crime Agency (NCA)

- Police Scotland
- Scottish Business Resilience Centre (SBRC)
- Scottish Government (human trafficking policy, organised crime policy and Marine Scotland)
- Scottish Prison Service (SPS)
- Trafficking Awareness Raising Alliance (TARA)

The group has continued to meet by video conference throughout the COVID-19 pandemic, taking a partnership approach with member agencies as well as sharing information on current trends and enforcement. The group directs action to ensure a consistency of approach across Scotland for enforcement agencies, third sector bodies and support organisations to ensure the strategic aims of Action Area 2 are met.



“ Thank you so much for helping not only me but my entire family, you’ve done so much for me. I will remember that you taught me to live in the present moment. I now notice so many organisations that have helped me, I’ve had so much support.”



The Police Scotland tactical group (including BTP) is made up of the National Human Trafficking Unit, Divisional Human Trafficking Champions from enforcement agencies including Ports and Borders, National Human Trafficking Threat Desk, Organised Crime and Counter Terrorism Unit and the Senior Investigating Officers of large scale human trafficking investigations. They lead investigations, raise awareness of human trafficking and exploitation and develop local partnership working. They are supported through specialist training and interactive forums to ensure a robust and consistent national approach. The tactical group advise the strategic group on current trends and enforcement action.

Looking back

The reporting year proved challenging for Action Area 2 with changes in working practices as a consequence of COVID-19 restrictions. Engagement between partners was recognised as a priority at the outset of the pandemic to tackle increased risks as visibility in the community and legitimate work opportunities decreased. Monthly briefings, including information and organisational learning from Action Area 2 partners and champions, are published and distributed to the group. The briefings were devised at the beginning of the pandemic as a method of drawing together 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.

Key outcome: public bodies and others report concerns appropriately

Section 38 of the Human Trafficking and Exploitation (Scotland) Act 2015 places a duty on specified public bodies to notify the Chief Constable of Police Scotland about a person who is, or appears to be, the victim of human trafficking or of slavery, servitude and forced or compulsory labour. Once in force, it will allow for the collation and processing of wider information about trafficking activity in Scotland not currently collected through the NRM or the criminal justice system. The implementation of section 38 has been delayed due to the ongoing response to COVID-19 and the continuing impact on public services.

The heads of the prosecuting authorities in the UK are committed to improving collaboration and sharing best practice. In September 2020 and October 2021, in furtherance of the commitments signed by the Lord Advocate and the other heads of UK prosecuting authorities in 2016, prosecutors from Scotland, Northern Ireland, England and Wales met to discuss current issues using video conferencing technology. COPFS has maintained its internal structure of local lead human trafficking prosecutors and has updated guidance for prosecutors where appropriate.



The National Human Trafficking Unit (NHTU) was created within Police Scotland to provide an overview of human trafficking and to manage NRM's allocated for investigation in Scotland. The Unit supports divisional activity, engages regularly with partners in terms of the Trafficking and Exploitation Strategy and develops policy and strategy in this area. The NHTU has enhanced its investigative capability and now comprises a number of dedicated officers, including a detective chief inspector, two detective inspectors, four detective sergeants and ten detective constables. A dedicated human trafficking unit has also been established within Greater Glasgow Division.

Additional officers are seconded to assist and bring specialist skills to particular investigations as required. This has included police officers with linguistic skills, intelligence analysts, cybercrime and financial specialists. The NHTU forms part of the Public Protection Command, 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. This structure feeds into the Action Area 2 Tactical Partners Group and supports a localised threat and intelligence led response to human trafficking and exploitation across Scotland.

Over 80% of all Police Scotland officers have completed online human trafficking training and a number of specialist trained officers support the network of over 40 human trafficking champions throughout Scotland. Awareness raising is an ongoing process with training delivered to probationary constables, newly promoted sergeants, senior investigating officers, advanced detective officers and sexual offences liaison officers. The training is augmented by messages on Police Scotland's intranet site available to all officers and staff along with a dedicated web page of information, guidance and access to the digital NRM platform.

Awareness raising in the reporting period proved challenging due to COVID-19 restrictions; however, this was mitigated by the use of technology. Online meeting platforms and webinars allowed delivery of presentations to a wide audience including universities, businesses, local authority staff, third sector and national and international partners. Audiences were targeted in response to specific threat assessments. This ensured the profile of human trafficking in Scotland was maintained and increased the number of human trafficking calls to Police Scotland by 62% in 2020 compared to 2019. Businesses were also contacted directly to make them aware of the threat of human trafficking, particularly during challenging operating conditions, increasing their resilience to the recruitment of exploited labour within their supply chains.



Police Scotland media campaigns and news releases promote the use of the Modern Slavery and Exploitation Helpline¹⁰ to businesses and members of the public as a reporting mechanism for concerns about human trafficking and exploitation. More information on Police Scotland's 2021 national media campaign "**Break the Chain**" can be found on page 5.

Human trafficking and exploitation was also highlighted through the development of national, local and social multi-media releases to coincide with Anti-Slavery Day on 18 October 2020 and the 16 Days of activism against gender-based violence between 25 November and 10 December 2020. Police Scotland's 2020 National Human Trafficking conference was postponed due to COVID-19 restrictions. It is anticipated the conference will be rescheduled for autumn 2022.

In partnership with the Modern Slavery and Exploitation Helpline, Police Scotland provided officers with access to the Unseen App¹¹ via their mobile devices from Anti-Slavery Day 2021 on Monday 18 October. The App will support officers when they suspect someone may be a victim of human trafficking or exploitation, providing guidance on the indicators of human trafficking, outline the various types of exploitation and ultimately make it easier for officers to identify potential victims.

Police Scotland worked closely with partners in Action Area 1 to develop and publish a NRM toolkit to support First Responders, enabling improved victim engagement and trauma-informed information gathering from Potential Victims of Human Trafficking (PVoT). More information can be found on pages 5 and 6.

Significant action has been taken to tackle County Lines and raise awareness among officers and staff of the potential for trafficking and exploitation offences against vulnerable people including cuckooing and drugs supply. Monthly intelligence summaries are published and circulated amongst Divisional County Lines Champions, human trafficking updates are provided to the bi-monthly County Lines meetings held across Police Scotland, bespoke training is provided to specialist officers, the County Lines Coordinators and Analysts assess and manage all intelligence related to County Lines to ensure a proactive and appropriate response. Enforcement intensification periods have also taken place over the last year.

“ I mean really I've got no complaints on my part. I loved the whole co-ordination of everything. You did a really good job of putting me back on my feet. It is a really good service you provide.”

10 <https://www.modernslaveryhelpline.org/>

11 https://www.unseenuk.org/about-modern-slavery/download-the-app/?gclid=EAlaIQobChMI85bpmav39AIV2N_tCh1MkADsEAAyASAAEgL3Z_D_BwE



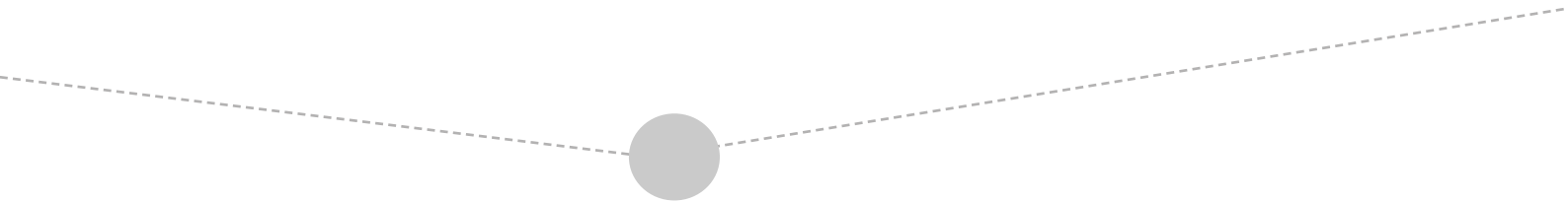
The NHTU forms part of the UK Modern Slavery and Organised Immigration Crime (MSOIC) Unit which focuses on intelligence sharing and directed activity tackling and disrupting the activities of organised crime groups, responsible for Organised Immigration Crime (OIC). The NHTU, as part of a UK wide effort to standardise the response to an OIC incident, is developing a response plan with internal and external partners.

Key outcome: intelligence is shared so that local areas and/or other countries are aware of patterns

Following the application of COVID-19 restrictions, Police Scotland closely scrutinised trends in the number and characteristics of NRMs to ensure an appropriate and effective response. The number of individuals entering the NRM fell by over 50% in the early stages of the pandemic which coincided with threat assessments from the Modern Slavery Police Transformation Unit (now the Modern Slavery Organised Immigration Crime Unit) and Human Trafficking Threat Desk that a combination of factors including COVID-19 restrictions and the UK leaving the European Union would effectively make victims of trafficking less visible. Threat assessments also identified that organised crime groups may diversify their activity and move into labour exploitation within agriculture, food processing and fishing as traditional industries such as nail bars and car washes closed.

To mitigate the threat, risk and harm, Police Scotland's response included:

- External communications via the Scottish Business Resilience Centre (SBRC) to those businesses involved in food supply/delivery and retail chains reminding them of the importance to undertake due diligence when hiring workers or agency staff and recognise the signs of potential trafficking or exploitation; the SBRC reached an audience of businesses with a combined staff of around 1.4 million;
- Liaison with the Gangmasters and Labour Abuse Authority (GLAA) to seek information/intelligence in respect of the impact of COVID-19 on Potential Victims of Trafficking (PVoT) involved in labour exploitation and to consider concerns raised over potential exploitation stemming from the use of recruitment agencies without adequate oversight and due diligence checks due to the speed and nature of resourcing needs;
- Daily liaison with Border Force and Home Office Immigration Enforcement to assess change in travel numbers/trends entering Scotland and the wider UK from source countries;
- Operation ENCOUNTER - a daily assessment by the Human Trafficking Threat Desk of available intelligence submitted via the Scottish Intelligence Database;
- Regular liaison with the National Crime Agency to understand the current situation in the wider UK and international developments to inform the current threat;

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- Liaison with divisional Human Trafficking Champions requesting proactive work undertaken locally to widen intelligence gathering;
 - Liaison with support services including TARA and Migrant Help to utilise their involvement with PVoT within the NRM process;
 - Establish from local authorities 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 local authorities, with subsequent dissemination to Housing Officers;
 - Engagement with Police Scotland Safer Communities (now Partnerships, Prevention & Community Wellbeing Division) to ensure awareness within homeless services and charities of the potential for PVoT using their services;
 - Engagement with Rural Community Policing Teams, including tasking them with visiting businesses to ensure COVID-19 guideline compliance, ascertain their knowledge and assist with intelligence requirements;
 - Request via appropriate landlords associations information on occupancies and knowledge of what their premises are being used for;
 - Regular distribution of the fortnightly Partners COVID-19 briefing; and
 - Execute Operation PERCEPTIVE which directly targeted labour exploitation in the agriculture, forestry and fishing sectors. Officers visited over 50 premises, covering more than 5,000

staff, gathering information on 26 gangmasters to seek out PVoT and potential exploiters. Three follow-up multi-agency visits in association with the Gangmasters and Labour Abuse Authority resulted. The visits also served to improve the intelligence picture around labour requirements, sourcing and human trafficking indicators.

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

Referrals received by Police Scotland in 2020 from contacts to the Modern Slavery and Exploitation Helpline decreased by 20% in comparison to 2019. However, those contacts that were received added significantly to the picture of human trafficking and exploitation in Scotland during the pandemic and resulted in a number of inquiries into labour exploitation in the farming and food production industries and sexual exploitation for the purposes of prostitution.

Police Scotland has continued to encourage investigating officers to consider Trafficking and Exploitation Prevention Orders (TEPOs) or Trafficking and Exploitation Risk Orders (TEROs) where appropriate and where legal thresholds have been met. Delays within the criminal justice system over the past year due to COVID-19 have proved challenging; however, there are a number of TEROs currently under consideration for human trafficking-related operations.



Action Area 2 has detected emerging threats and identified crime trends for human trafficking and exploitation using the following methods:

- NRM;
- National Human Trafficking Threat Desk Monthly threat assessments;
- Monitoring of specific contact and control (STORM) codes for emergency and non-emergency calls to Police Scotland;
- Calls to the Modern Slavery and Exploitation Helpline; and
- Participation with, and analysis from, the Modern Slavery Organised Immigration Crime Unit Joint Slavery and Trafficking Analysis Centre.

Action Area 2 joint operations have included five Project AIDANT enforcement intensification periods led by the NCA. Project AIDANT activity in Scotland in 2020 saw 20 PVoTs identified, 5 NRM's submitted, 146 sites/premises investigated, 8 arrests and 6 new investigations instigated. Themes during the reporting period included:

- Labour Exploitation;
- Child Trafficking; and
- Criminal finances linked to modern slavery and human trafficking.

Three further joint operations are planned for 2021/22 with the themes of:

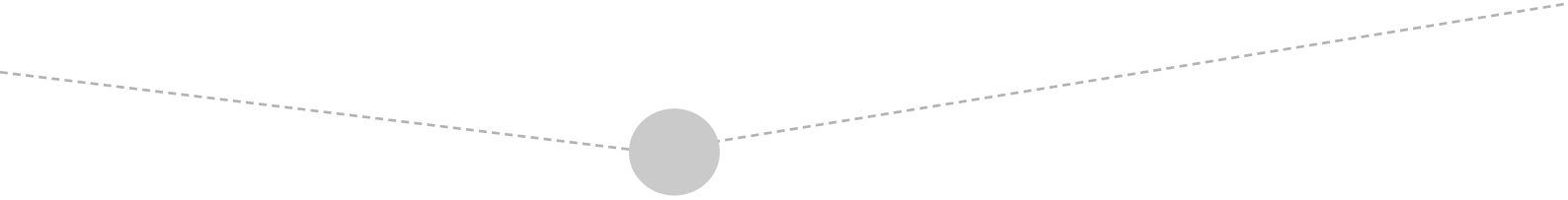
- Child Trafficking;
- Sexual Exploitation; and
- Illicit Finances.

Operation BEAR

Police Scotland has continued to pursue the perpetrators of human trafficking and exploitation across national and international boundaries, including through several joint investigation teams (JIT) with other European Law Enforcement agencies and Europol. A recent example of this is Operation BEAR, a complex major enquiry targeting sexual exploitation for prostitution of Romanian females, involving a joint investigation team (JIT) with Romanian Law Enforcement Authorities and Europol. This tackled a serious and organised crime group who were operating in Scotland, England and Romania.

On 9 September 2020 a coordinated executive day of action in Romania, Scotland and England resulted in the arrest of 27 Romanian nationals. Romanian and Scottish prosecutors have agreed that all accused will now be prosecuted in Romania.

During the investigation in excess of 30 PVoT were identified throughout Europe. Despite COVID-19 interrupting the secondment of Romanian officers to Police Scotland, cooperation has continued and been strengthened by participation in JITs such as Operation BEAR and other ongoing investigations into the trafficking of Romanian nationals for sexual and labour exploitation.



Since 2014, Vietnamese nationals have been the largest nationality grouping within the NRM in Scotland. Although impacted by COVID-19 restrictions, Vietnamese PVoT accounted for 24% of all NRMs received in 2020.

Following detailed discussions between Police Scotland, the Foreign, Commonwealth and Development Office (FCDO), the Home Office (HO), National Crime Agency (NCA) and the Vietnamese Ministry of Public Security over an 18-month period, two Vietnamese officers from the Ministry of Public Security were seconded to Police Scotland in October 2020 for a period of 6 months. The secondment built upon the 2018 Memorandum of Understanding between the UK and Vietnam on human trafficking to enable greater collaboration around supporting victims, intelligence sharing and prevention work. The secondment became increasingly significant following the deaths of 39 Vietnamese nationals in Grays, Essex, in October 2019.

“ I am so glad that I was able to be able to be part of your support system, I have enjoyed, I have learnt a lot and thank you. We have felt loved and appreciated, how I wish this would have continued. I will miss all of your great team. Thanking you once more. God bless you and take care.”

Despite a number of challenges, including COVID-19 restrictions which limited opportunities for the officers to travel and engage with other law enforcement professionals, the insight into Vietnamese culture, travel and migration patterns that the officers provided has proven invaluable. The initiative provoked enquiries from many sources including media, third sector partners, statutory bodies, local authority elected members and Members of Parliament around planning for the secondment and deployment of the officers. The secondment provided Police Scotland with a unique learning experience and provides opportunities for further such exchanges in the future.

Over the reporting period the GLAA have continued to receive a steady number of referrals both via the Modern Slavery and Exploitation Helpline and directly to their own confidential reporting line. In response to this, a number of visits have been undertaken throughout Scotland, focusing on allegations of labour exploitation and worker welfare. In addition, two LMEU's (Labour Market Enforcement Undertakings) and six Enforcement Notices in relation to unlicensed trading have been issued.



GLAA engagement on shellfish gathering

Over the last year the GLAA has seen a significant increase in the number of reports regarding shellfish gathering in the UK. These reports not only suggested an increase in gathering activity but also unsafe working practices and potential exploitation within the sector.

In response, and consistent with the objectives of Project Aidant, the GLAA worked with partner agencies to increase awareness of human trafficking and encourage engagement from gatherers and members of the public. High visibility patrols by GLAA officers, Police Scotland, East Lothian Council and Fife Council were conducted over a single weekend and more than 50 gatherers were spoken with.

All were handed leaflets outlining their employment rights and how to spot the signs of modern slavery and human trafficking. They were also given guidance on the amount of shellfish they could collect from the sands for their own personal use.

While no offences were identified during the activity, the operation successfully focused on the welfare of the workers encountered by the teams. In addition to speaking to the gatherers, there was positive engagement with local residents who were keen to help ensure that their neighbourhoods remain free from exploitation and dangerous working practices.

The GLAA have also launched a Scotland specific section within their website.¹² This highlights the way the GLAA works within Scotland and signposts users to the various partners and support services who operate within Scotland. The GLAA is committed to protecting vulnerable and exploited workers and continues to look for opportunities to work alongside partners to achieve this common goal.

HMRC resources have been reallocated to COVID-19 support schemes and to revenue collection, which has resulted in a reduced operational focus on trafficking in the reporting period. However, labour exploitation remains a major issue in specific sectors, including restaurants/takeaways, car washes, construction, agriculture/fisheries and beauty (nail bars). Labour exploitation can impact on the correct assessment of a range of income and business taxes as well as national minimum wage compliance.

Accordingly, HMRC will continue to support joint operational activity with law enforcement partners where an HMRC risk has been identified and where capacity allows. HMRC intelligence and data will be shared with partners to support their wider objectives and specific operations, legal gateways permitting. HMRC will continue through an organised taskforce programme to target specific trade sectors involving labour exploitation and trafficking risks.

12 <https://www.gla.gov.uk/who-we-are/what-we-do/scotland/>



Key outcome: police, prosecutors and courts use all powers and take robust action as appropriate

COVID-19 restrictions reduced border movements and the visibility of PVoT, resulting in fewer individuals entering the NRM or reporting crimes recordable in Scotland. A review of compliance with the Scottish Crime Recording Standards also changed the way human trafficking offences are recorded.

There was a 56% reduction in human trafficking related crimes recorded by Police Scotland in 2020 and a similar reduction in the number of immigration related crimes recorded. Despite the fall in recorded crimes, there was a 13% increase in the reporting of sexual exploitation crimes. Over the reporting period, Police Scotland undertook a number of difficult and complex investigations including:

- Operation BEAR – a two year investigation into sexual exploitation of Romanian females which resulted in 27 arrests and has been reported to Romanian Law Enforcement authorities for consideration of prosecution in Romania (see page 21 for more details);
- Operation DROOVE – investigations into drug production offences. Between November and December 2020, 8 Vietnamese males and a female were arrested and 10 PVoT were identified and entered the NRM;

- Operation BOBFLOAT – in September 2020, two males and a female were arrested in connection with human trafficking for sexual exploitation offences; and
- Operation CEEMAX – commenced in the autumn of 2020 and saw three Romanian nationals arrested in connection with sexual exploitation for prostitution.

Between implementation of the Human Trafficking & Exploitation (Scotland) Act 2015 and 31 March 2021, COPFS has received 61 cases from Police Scotland which have included charges in terms of the 2015 Act.

In 35 of those 61 cases, prosecutors have taken action in relation to charges in terms of the 2015 Act. (Action has been taken in respect of other charges in some of the other 26 cases.)

- In 4 of those 35 cases, 5 individuals have been convicted of charges in terms of the 2015 Act; and
- In 5 of those 35 cases, the accused person(s) was acquitted of a charge in terms of the 2015 Act.

In total, 9 people have been convicted of relevant offences, as defined in section 16 of the Human Trafficking and Exploitation (Scotland) Act 2015, since TEPOs came into effect. Of those individuals, 8 have been made subject to TEPOs.



Looking forward

COVID-19 posed many challenges in pursuing those who perpetrate human trafficking and exploitation crimes. This did not stop enforcement work and there are several ongoing major enquiries relating to trafficking and exploitation including for sexual exploitation, labour exploitation and domestic servitude in Scotland.

As we progress through the pandemic and look to the future, it is hoped to concentrate on those work strands which have necessarily been delayed, including progressing applications of TEPOs and TEROs, developing new ways of working with our international law enforcement and third sector partners, improving victim engagement and advancing Police Scotland's Partner's Intelligence Portal (see page 43).

The secondment of a Justice and Care Victim Navigator to the NHTU is enabling early contact with PVoT, supporting them through their journey to improve their experience and assist them to engage with the criminal justice process where they wish to do so. The Victim Navigator is also gathering good practice from the network of other Navigators around the UK and disseminating this within Police Scotland. The secondment is enabling the exploration of new ways to engage with potential victims of trafficking.

As noted on page 5, a media campaign entitled "Break the Chain" was launched by Police Scotland in March 2021. Early indications are that the campaign has resulted in two major enquiries into labour exploitation including Operation BARRAMUNDI which, through multi-agency joint working, resulted in 4 arrests for labour exploitation of Romanian nationals in farming, with 3 individuals charged with offences under the Gangmasters (Licensing) Act 2004. Operation BARRAMUNDI is the largest labour exploitation safeguarding operation undertaken by Police Scotland to date and it is hoped that increased reporting of labour exploitation will continue as the campaign messages resonate with the target audience.

Project AIDANT intensification periods will continue to involve multi-agency coordination.

Section 3

Action Area 3 – Address the conditions that foster trafficking and exploitation

Action Area 3 focuses on addressing the conditions that can enable human trafficking to take place. The implementation group has a focus on a number of key issues, including:

- awareness of trafficking;
- engagement with and the role of businesses and other communities in preventing trafficking; and
- addressing the wider conditions, including poverty and inequality, which make trafficking possible and profitable.

Action Area 3 is chaired by the Scottish Government and met once during the reporting period.

Membership of the group includes:

- Anti-Trafficking Monitoring Group
- Brightwork Recruitment
- Gangmasters and Labour Abuse Authority (GLAA)
- Hope for Justice
- Independent Anti-Slavery Commissioner's office (IASC)
- International Justice Mission (IJM)
- Police Scotland
- Renfrewshire Council
- Scottish Government (human trafficking policy, procurement policy, homelessness policy, organised crime policy, equality policy)
- University of Stirling Centre for Child Wellbeing and Protection

Looking Back

The third annual progress report identified five different strands of work that Action Area 3 would continue to deliver and take forward during 2020/21, further detail of which can be found in this chapter. These were:

- Following the Home Office's consultation on strengthening Transparency in Supply Chain (TISC) requirements, the Scottish Government will work with partners to ensure effective implementation in Scotland;
- The group will build on the work already done to raise public awareness, including consideration of how awareness raising activity can make the greatest impact on stopping trafficking and helping victims;
- The group will consider further opportunities to target support and interventions towards those at most risk of trafficking;
- On research, CATRiS at the University of St Andrews has made a positive start towards drawing together existing research activity related to trafficking; the group will work with CATRiS to make more effective use of research and consider where further research may be required; and
- The international roundtable hosted by the Cabinet Secretary for Justice identified where some further work could be taken forward in strengthening international links and considering in-country work to prevent trafficking.



Key outcome: people know about the extent of trafficking in Scotland

Identifying the full extent and nature of human trafficking in Scotland is a significant challenge. While data from the NRM provides part of the picture, trafficking is often a hidden crime, with perpetrators going to great lengths to maintain their control without raising suspicion. It is vital that victims can be identified and helped to access the support that they require. We all have a key role to play in recognising potential signs of trafficking and reporting any concerns to Police Scotland or the Modern Slavery and Exploitation Helpline. This can be crucial in detecting and recovering individuals from exploitative situations, ensuring the necessary support is available and bringing traffickers to justice.

In spring 2021 the Scottish Government commissioned a fifth annual **public awareness study** to build on evidence from previous years on whether awareness is improving and what aspects continue to prove challenging.

In line with public health restrictions, the 2021 survey was conducted solely online. A sample of 1,000 adults were interviewed from 17-24 March 2021.

As noted in the third progress report, the results of the online survey cannot be directly compared with previous surveys carried out using face-to-face methodology. However, the online data gathered in 2020 and 2021 are comparable.

The trend for respondents to view human trafficking as less of an issue the nearer to home the question relates continued in 2021. More than one in two respondents viewed human trafficking as an issue to a great extent in the rest of the world, with this reducing to 45% of respondents in relation to Europe. This trajectory continues with 15% believing it is an issue “to a great extent” in Scotland compared to 8% in their local area.

Respondents were also asked to spontaneously name the activities/industries that might involve adult victims of trafficking in Scotland. Results were broadly consistent with 2020, with 49% identifying the sex industry/prostitution, followed by catering/hospitality (18%), farming (17%) and beauty industry/nail bars (14%). Overall, there were signs of slightly lower awareness around human trafficking. While the reasons for this reduction were not explored, it may be linked to a focus on the pandemic, with subsequently less space for messaging around human trafficking. A significant proportion of respondents (38%), did not know when unprompted which industries and activities in Scotland might involve children who are victims of trafficking.

When respondents were asked what they would do if they suspected someone had been trafficked and was being exploited, responses were broadly the same as 2020, with 82% saying they would report it to police.

More detail on the findings of the survey can be found in the report which is available online.¹³

The Scottish Government promotes the UK-wide **Modern Slavery and Exploitation Helpline** (08000 121 700) in marketing materials and communications activity, encouraging members of the public to report any concerns they may have through the phone line, website or app. The helpline has published quarterly reports covering 2020 and their annual report was released earlier this year. The reports reflect a slight decrease in the total number of referrals to the helpline from Scotland – from 190 in 2019 to 178 in 2020. Raising concerns with the Helpline through the online facility remained broadly consistent at around a third of all referrals. Enabling alternative referral routes through which the public can report concerns is a key commitment in the Strategy.

As set out in last year's progress report, the Scottish Government planned a **marketing campaign** to raise public awareness of human trafficking, following on from the successful campaign in autumn 2017. The campaign was initially scheduled to launch in May 2020, but given the impact of the COVID-19 pandemic the decision was taken to push this back to later in 2020. However, as focus remained on the pandemic throughout winter 2020/21, we elected to pause the campaign until such times as it will achieve maximum impact.

The Scottish Government and partners have continued to make use of opportunities for coverage of human trafficking issues, including the publication of the Independent Anti-Slavery Commissioner's annual reports in September 2020 and July 2021, the secondment of Vietnamese officers to Police Scotland, Anti-Slavery Day in 2020 and 2021 and the launch of the NRM toolkit in March this year. The **joint communications planning group** was relaunched in March 2020 and has continued to liaise remotely to improve coordination and effectiveness of messaging. This group includes Police Scotland, the Independent Anti-Slavery Commissioner's office, TARA, Migrant Help, COPFS and others.

“ The time with TARA was just right, I have been supported by TARA for over a year and I feel safe and confident now.”

13 <http://www.gov.scot/ISBN/9781802017717/documents/>



The **Consortium of Anti-Trafficking Researchers in Scotland (CATRiS)**, was created two years ago through the collaboration of independent researchers of trafficking-related areas of study throughout Scottish Higher Education Institutions. It was deliberately placed at the nexus between these researchers, the Scottish Government, Police Scotland and the third sector in Scotland. It also, uniquely in the UK, brought together those researching “trafficking” more widely – such as human, arms, drugs and wildlife, with an expanding field of shared intelligence to offer to those designing policy or policing efforts. Just prior to COVID-19, student groups throughout Scotland voiced a wish to create a student wing of CATRiS to raise awareness of trafficking issues and this was in the process of being established mirroring the partnership working between institutions.

CATRiS has reached a point where further development funding is required. The will of the researchers remains, across Scotland they have been working throughout the pandemic and continue to be keen to collaborate on trafficking issues (especially based on what can be learnt from the lack of routine movements during lockdown periods) but funding is critical if CATRiS is to move forward. Funding opportunities will be explored, where time allows, and the goodwill of the CATRiS steering group members will remain until a way forward is found.

The Scottish Government has developed strong links with the **Modern Slavery and Human Rights Policy and Evidence Centre¹⁴ (Modern Slavery PEC)**. This engagement has enabled the Modern Slavery PEC to utilise evidence from Scotland when developing research proposals and both the Scottish Government and Modern Slavery PEC are committed to working together to design and support research that will lead to improved outcomes for survivors of human trafficking and exploitation.

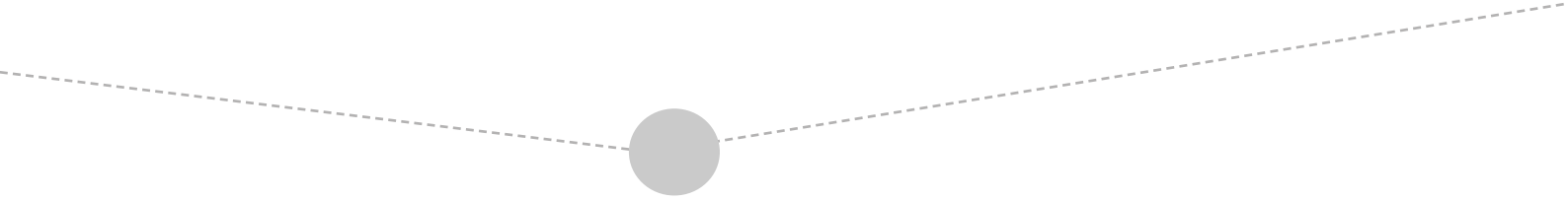
Key outcome: people and businesses are aware of how what they do and buy can contribute to this crime

Action to identify, tackle and prevent human trafficking requires a response from across society. The corporate sector has a key role to play and as part of plans to develop our engagement in this area, the Scottish Government has supported the creation of Scotland Against Modern Slavery¹⁵ (SAMS) alongside Shan Saba, a director with Brightwork Recruitment. SAMS was created to inform and share best practice about human trafficking and exploitation throughout the business community in Scotland.

“TARA have helped me in so many ways, thank you to my worker for all of your support.”

14 <https://modernslaverypec.org/>

15 <https://www.scotlandagainstmmodernslavery.co.uk>



As part of the launch, the former Cabinet Secretary for Justice participated in a SAMS podcast, highlighting risks to businesses and the steps they can take to mitigate them both in their own operations and wider supply chains. Further podcasts have included the Independent Anti-Slavery Commissioner and the detective superintendent leading Police Scotland's National Human Trafficking Unit.

Following the Independent Review of the UK Modern Slavery Act 2015, the Home Office held a public consultation from July-September 2019 around reforms to the requirements on businesses to produce and publish **Slavery and Human Trafficking Statements**. In September 2020, the Home Office published its response to the consultation¹⁶, committing to a significant strengthening of legal requirements for businesses with a turnover of £36m or more, including legislative change to:

- mandate reporting topics that Trafficking and Exploitation Statements must cover;
- introduce a single reporting deadline of 30 September by which all statements must be published;
- require organisations in scope of the legislation to publish their statements to the government-run modern slavery statement registry; and

- extend the transparency in supply chain requirements to public bodies in England and Wales with a budget of £36m or more.

The Scottish Government welcomed the strengthening of requirements for large businesses and is committed to exploring separately in Scotland about the extension of transparency in supply chain requirements to Scottish public bodies.

The Home Office also committed to consider enforcement options alongside the development of the Single Enforcement Body (SEB) for employment rights and issue a further update in due course.

On 12 January 2021 the UK Government announced plans to introduce financial penalties for organisations who fail to meet their statutory obligations to publish annual modern slavery statements. The new SEB for employment rights will have powers to impose the financial penalties against non-compliant organisations. Along with the wider package of changes to section 54 announced in the consultation response, the introduction of financial penalties will require legislative change and we understand will be introduced when parliamentary time allows.

Another important area in addressing human trafficking risks is **public procurement**. An online platform¹⁷ has been developed to provide easier access for buyers across the public sector in

16 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/919937/Government_response_to_transparency_in_supply_chains_consultation_21_09_20.pdf

17 <https://sustainableprocurementtools.scot/>



Scotland to the national sustainable procurement tools. The Scottish Government launched the platform in June 2020 and have continued to promote and support its use. So far over 105 Scottish public sector bodies have registered, as well as public, third sector and private organisations in other parts of the UK and further afield. The tools are designed to help Scottish public bodies comply with policy and legislation and to help them identify and achieve economic, social and environmental outcomes through their procurement activity.

The guidance for practical application of sustainable procurement is also on the platform enabling buyers to more easily access and reference information on how to take an ethical approach in their procurement activity including the consideration of human trafficking and exploitation risks.

Key outcome: people at most risk get help to increase their resilience against trafficking

A two-year Seasonal Agricultural Workers Pilot Scheme (SWP) was announced by the UK Government in 2018 in response to concerns raised by farmers about possible labour shortages in advance of, and after, the UK had left the European Union (EU). The ending of freedom of movement means workers who enter the UK to work in the horticulture sector must do so via the pilot.

In the third annual progress report it was noted that the Scottish Government had agreed to provide funding of £48,000 to Focus on Labour Exploitation (FLEX) over 2019/20 and 2020/21 towards an anti-trafficking and exploitation project aimed at workers participating in the pilot.

The research was conducted by FLEX and Fife Migrants Forum (FMF) between March 2020 and February 2021 and collected 146 responses from seasonal worker visa holders (non-European Economic Area citizens) and non-seasonal worker visa holders (European Economic Area citizens exercising free movement) in order to evidence their experiences of seasonal agricultural work in Scotland. Although the focus of the research was on the lived experience of workers, detailed interviews were also carried out with employers, sector bodies, labour providers and trade unions.

In 2020, labour exploitation was the largest indicator in referrals from Scotland to the National Referral Mechanism. During 2020, 387 referrals were made to the National Referral Mechanism in relation to Scotland. Labour exploitation was indicated in 228 of those cases. The research contributed directly towards two outcomes in the Trafficking and Exploitation Strategy:

- People at most risk get help to increase their resilience against trafficking; and
- Victims are aware of support and trust it enough to ask for help.



The report¹⁸ was published in March 2021 and highlighted a number of issues with key recommendations for both the Scottish and UK Governments. The Scottish Government is committed to taking all steps within its existing powers to address the relevant recommendations.

In partnership with JustRight Scotland, FLEX and FMF have developed factsheets covering the rights of agricultural workers on the seasonal workers visa in Scotland¹⁹ and, separately, European Economic Area seasonal agricultural workers who hold settled or pre-settled status²⁰ through the UK Government's EU Settlement Scheme. These have been routinely updated to include information on COVID-19 regulations.

The Scottish Government has commissioned a research project to address a number of critical data gaps around migrant workers including:

- number of seasonal jobs in the agricultural sector; and
- demographics of migrant workers, living conditions, wage rates, types of contract, and visa concerns.

The work will also contribute to a wider knowledge base on rural community wellbeing, fair work practices, migration issues, and equalities concerns in the agriculture sector. The data will contribute to our targeted action to develop an evidence-based case for an approach to migration, consistent with the new national population strategy.

Child Poverty

Tackling child poverty remains a key priority for Scottish Ministers, in line with the ambitious targets within the Child Poverty (Scotland) Act 2017. It is estimated that in 2020/21, the Scottish Government invested around £2.5 billion in funding to support low income households, £983 million of which was targeted directly at children in low income families.


Scottish Ministers published the third annual progress report due under the Child Poverty Act in June 2021,²¹ reflecting progress in implementing the Tackling Child Poverty Delivery Plan. The progress report outlined that all 66 of the actions previously reported on are either in progress or delivered.

18 <https://labourexploitation.org/publications/assessment-risks-human-trafficking-forced-labour-uk-seasonal-workers-pilot#overlay-context=publications/assessment-risks-human-trafficking-forced-labour-uk-seasonal-workers-pilot>

19 <https://www.justrightscotland.org.uk/wp-content/uploads/2021/04/Guidance-Seasonal-migrant-workers-EnglishSWP-March-2021.pdf>

20 <https://www.justrightscotland.org.uk/wp-content/uploads/2021/04/Guidance-Seasonal-migrant-workers-EnglishEEA-March-2021.pdf>

21 <https://www.gov.scot/publications/tackling-child-poverty-third-year-progress-report-2020-2021/>



During 2020/21 the Scottish Government continued to deliver progress as part of the Tackling Child Poverty Delivery Plan, but also introduced a wide range of additional support to protect people and communities through the response to COVID-19. Key action taken includes:

- Introducing the Scottish Child Payment for eligible children aged under 6 on 15 February 2021, worth £10 a week per child to low-income families – significantly ahead of the timetable set out in the Delivery Plan. Awards totalling £3.6m were made by 31 March 2021, which are estimated to have benefitted 78,775 children; on 29 November 2021, the Scottish Government announced it would double the value of the Scottish Child Payment to £20 per week per child from April 2022 which will help to lift a further 20,000 children out of poverty in Scotland;
- Investing over £56 million in the continuation of Free School Meal provision for low income families during school closures, periods of online learning and school holidays – helping to tackle food insecurity and benefitting around 156,000 children and young people by the end of summer 2020;
- Delivering over 36,000 devices through our Connecting Scotland programme which aims to eradicate digital exclusion in Scotland, benefitting over 17,000 families with children and 4,000 young care leavers;

- Providing over £100 million of additional investment in third sector and community organisations to enable them to respond to local and community need – including to tackle food insecurity and promote wellbeing; and
- Allocating considerable resource to local authorities to tackle food and financial insecurity through a cash-first approach, including an additional £22 million for the Scottish Welfare Fund, £8 million for Discretionary Housing Payments, £30 million to tackle food insecurity and £40 million to tackle financial insecurity – helping to ensure families received the help they needed.

Scottish Ministers will continue to report annually on progress made in relation to both the targets set and delivery of actions committed. We will outline further measures to tackle child poverty in our next Delivery Plan, to be published in March 2022.

“ The workers at TARA were great and I felt supported during the past year and especially during lockdown period.”



Refugees, asylum seekers and migrants

The second New Scots refugee integration strategy²² was published in January 2018. It is led by a partnership of the Scottish Government, COSLA and the Scottish Refugee Council and involves a wide range of partners across different sectors. The New Scots vision is for a welcoming Scotland where refugees and asylum seekers are able to rebuild their lives from the day they arrive. The strategy sees integration as a long-term, two-way process, involving positive change in both individuals and host communities, leading to cohesive, diverse communities. It recognises that refugees and asylum seekers may have been trafficked on their journey to Scotland and can be vulnerable to exploitation by traffickers and others as they seek safety.

In 2020 the New Scots partnership secured EU funding and in August 2021 the award of £2.8 million in grants to refugee projects which support New Scots was announced. In total 56 projects are receiving funding to deliver initiatives designed to help New Scots settle in their new communities by promoting employability, education, health and social and cultural connections.

On 24 March 2021, the Scottish Government and COSLA published **Ending Destitution Together**,²³ a joint strategy to improve support for people subject to No Recourse to Public Funds (NRPF) living in Scotland. NRPF is a highly complex area. An NRPF condition can apply to anyone who is in the UK on a visa, who has applied for asylum or protection, who is an adult dependent relative of a British citizen or person with settled status, or who doesn't have permission to remain in the UK. Some people who are subject to NRPF can be vulnerable to exploitation and trafficking.

The Ending Destitution Together strategy aims to align with work to support trafficking victims and to prevent anyone who is subject to NRPF being pushed into destitution, as well as supporting people to find routes out of destitution. The strategy will be delivered in partnership with third sector, public services and local authorities over the next three years.

“ I cannot thank Migrant Help enough, I have been in some very bad places in my life, and this service has been a shining light for me to move forward and begin to be able to hope that I can see my children again.”

22 <https://www.gov.scot/publications/new-scots-refugee-integration-strategy-2018-2022/>

23 <https://www.gov.scot/publications/ending-destitution-together/>



Homelessness

We are committed to preventing and ending homelessness and rough sleeping in Scotland through our Ending Homelessness Together Action Plan,²⁴ which was updated in October 2020 in light of the COVID-19 pandemic. The plan sets out how we are acting together across public services to implement shared solutions to these challenging issues. This is backed by a further £50 million for our Ending Homelessness Together Fund this parliamentary term. Given the crucial role of getting people into settled housing as quickly as possible, we are investing £37.5 million to support local authorities to prioritise settled accommodation for all through the implementation of rapid rehousing transition plans and the upscaling of Housing First for those facing the most challenges.

We have also seen what is possible when we respond collectively and urgently with an inclusive and human rights-based approach to tackling homelessness. Since March 2020, the Scottish Government has provided over £1.5 million to third sector organisations to enable them to acquire emergency hotel accommodation for people experiencing, or at risk of experiencing homelessness such as rough sleepers and people with no recourse to public funds.

We are committed to ensuring there is no return to night shelter type accommodation. We supported our partners to modify night shelter provision in Edinburgh and Glasgow in winter 2020/21 by contributing to the cost of rapid rehousing welcome centres. The centres will operate again this winter, supported by Scottish Government funding. The centres offer hotel room accommodation and built on good practice to provide under-one-roof multi-agency assessment and support for people at risk of rough sleeping.

A range of measures were put in place to ensure tenants remained safe in their homes during the pandemic, including introducing extended notice periods and an eviction ban for areas subject to certain restrictions. Rapid rehousing and Housing First will be at the centre of our COVID-19 recovery strategy.

²⁴ <https://www.gov.scot/publications/ending-homelessness-together-updated-action-plan-october-2020/>



Violence against women and girls

The Scottish Government remains committed to tackling violence against women and girls and this work continues within the framework of the Equally Safe Strategy. Equally Safe, Scotland's strategy for preventing and eradicating violence against women and girls, is ambitious and encourages us all to be bold in prioritising actions which will eliminate systemic gender inequality that lies at the root of violence against women and girls. Equally Safe adopts the position that prostitution is a form of gendered violence.

Female victims of trafficking are disproportionately likely to be exploited for the purposes of sexual exploitation and we are committed to challenging the systemic inequality which drives this form of violence against women. Against that background, in September 2020 the Scottish Government took forward Scotland's first national consultation 'Equally Safe: Challenging Men's Demand for Prostitution, working to reduce the harms associated with prostitution and helping women to exit'²⁵ to discuss our future approach to this vital issue within the context of how women and girls should be treated in an equal society.

The response to the consultation²⁶ was published in June 2021 and the Scottish Government has committed to developing a model for Scotland to tackle this form of violence against women and consider how aspects of international approaches which seek to challenge men's demand for prostitution could best be applied in Scotland. A Short Life Working Group of key stakeholders, including public sector and third sector representatives, has been convened to develop fundamental principles. This group will be informed by a reference group, with membership across government, the wider public sector and third sector.

In addition to a focus on challenging men's attitudes towards the purchase of sex, the Scottish Government is taking forward engagement with those with direct or lived experience to shape services and design measures which will protect them from harm and provide the support they need, including helping them exit prostitution where they are ready to do so.

25 <https://consult.gov.scot/violence-against-women-team/equally-safe-reduce-harms-associated-prostitution/>

26 <https://www.gov.scot/publications/equally-safe-challenging-mens-demand-prostitution-working-reduce-harms-associated-prostitution-helping-women-exit-scottish-government-response/>



Sustainable Development Goals (SDG)

The 2030 Agenda for Sustainable Development provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. As part of this, the Sustainable Development Goals (SDGs) are a universal call to action. Scotland's National Performance Framework (NPF) integrates the 17 SDGs alongside the 11 National Outcomes and is an important part of Scotland's localisation of the SDG agenda. The NPF provides a platform for collaboration based on delivering the National Outcomes and the SDGs. Action is required on both the Outcomes and SDGs simultaneously.

A review of Scotland's progress towards the SDGs was published in July 2020.²⁷ The report was developed collaboratively between the SDG Network Scotland, Scottish Government and COSLA and includes sections on violence against women and girls (target 5.2 of SDG 5: gender equality), modern slavery and human trafficking (target 8.7 of SDG 8: decent work and economic growth) and human trafficking and sexual exploitation (targets 16.1, 16.2 and 16b of SDG 16: peace, justice and strong institutions). This review supplements the 2019 UK Government Voluntary National Review, the main mechanism by which UN nations are expected to report on their performance towards the SDGs.

In December 2020, the Scottish Government and COSLA jointly published an analytical report which provided evidence on the ways that the pandemic had affected progress towards Scotland's National Outcomes.²⁸ A key feature of the evidence is that COVID-19 impacts have been (and are likely to continue to be) borne unequally. COVID-19 has acted in a way that is expected to widen many existing inequalities and produce disproportionate impacts for some groups that already face particular challenges. These include households on low incomes or in poverty; low-paid workers; children and young people; older people; disabled people; minority ethnic groups and women.

“ I really cannot add anything else. I think that TARA were so nice to me and I had really good support from them. Everything was perfect and I will miss the staff.”

27 <https://www.gov.scot/publications/scotland-sustainable-development-goals-national-review-drive-action/>

28 <https://nationalperformance.gov.scot/scotlands-wellbeing-impact-covid-19>



International action

Action Area 3 remains committed to exploring prevention opportunities in relation to international aspects of trafficking. Police Scotland has continued to work closely with international partners, including through the ground-breaking secondment of officers from the Vietnamese Ministry of Public Security and this is set out in detail on page 22 within the Action Area 2 section.

Forward Look

Action Area 3 will continue to raise awareness of and compliance with the Modern Slavery Act 2015 amongst businesses in Scotland. Working closely with Scotland Against Modern Slavery, the group will look to develop the private sector response to human trafficking and exploitation, including the creation of pathways to employment where appropriate.

The group will support the consideration of the extension of transparency in supply chain legislation to Scotland.

Following the the fifth public survey on awareness of human trafficking and exploitation in 2021, Action Area 3 will assess the ongoing benefits of a public awareness survey and, if beneficial, whether the question set should be revisited.

Section 4:

Child Trafficking

The Child Trafficking Strategy Group (CTSG) brings together the specific elements of the three action areas which relate to children who are, or may be, victims of human trafficking and exploitation. For the purposes of the Human Trafficking and Exploitation (Scotland) Act 2015, a child is defined as a person under 18 years of age.

The CTSG meets on a quarterly basis, however over the pandemic these meetings were paused and the group was convened in March 2021. There is cross-membership between the Child Trafficking Strategy Group and the three Action Area Implementation Groups to facilitate the co-ordination and sharing of information.

Membership of the group includes:

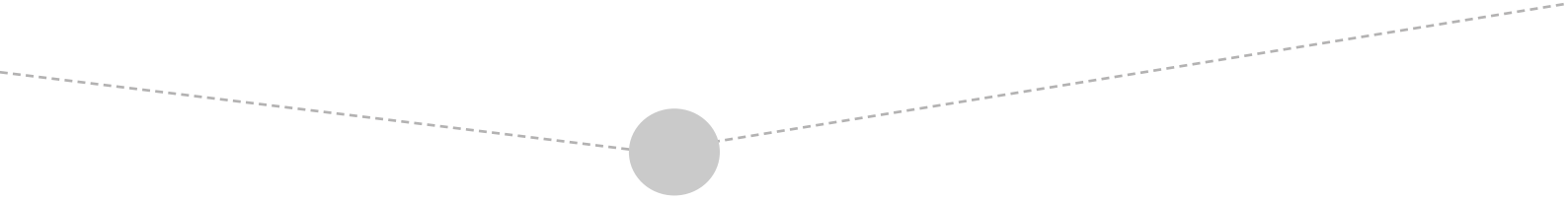
- Barnardo's
- Child Protection Committees Scotland
- City of Edinburgh Council
- Convention of Scottish Local Authorities (COSLA)
- Crown Office and Procurator Fiscal Service (COPFS)
- Every Child Protected Against Trafficking (ECPAT)
- Glasgow City Council (Glasgow City Health and Social Care Partnership)
- Home Office
- JustRight Scotland
- NHS Greater Glasgow and Clyde (NHS GGC)
- Police Scotland
- Scottish Children's Reporter Administration (SCRA)

- Scottish Government (Child Protection policy, Human Trafficking policy)
- Scottish Guardianship Service (Aberlour and Scottish Refugee Council)
- UNICEF UK
- University of Stirling Centre for Child Wellbeing and Protection

Looking Back

The third annual progress report identified a number of areas that the CTSG would continue to deliver and take forward. These included:

- addressing barriers to unaccompanied and trafficked children accessing good quality interpretation services, legal advice and further education;
- exploring the increase in trafficking of children who are UK nationals and are potential victims of child criminal exploitation by engaging with Scotland's Serious Organised Crime Strategy;
- consider the recommendations from research commissioned by the Scottish Government on the routes into trafficking for children; as well as exploring the delivery of workshops to raise awareness about trafficking and exploitation with practitioners;
- deliver training on the implementation of the revised age assessment guidance;
- deliver Scotland's National Action Plan on Internet Safety for Children and Young People with a particular focus on deterring perpetrators from committing abuse online; prioritise action to tackle Child Sexual Exploitation in Scotland; and

-
- 
- work to develop the Independent Child Trafficking Guardians service, and the incorporation of the United Nations Convention on the Rights of the Child into domestic law.

More information on the actions above and other work streams of the CTSG will be set out in this section. New areas of focus for the period ahead will also be highlighted, taking into account the impact of COVID-19 and wider considerations which may arise from the UK Government's New Plan for Immigration and Nationality and Borders Bill.

Action Area 1: identify victims and support them to safety and recovery

Work continues on the implementation of Section 11 of the Human Trafficking and Exploitation (Scotland) Act 2015 to launch the statutory **Independent Child Trafficking Guardian** (ICTG) service for unaccompanied asylum seeking children, where there is reason to believe they might have been, or are at risk of being, trafficked.

To assist with the development of the new service, the Scottish Guardianship Service (SGS) hosted two focus groups on behalf of the Scottish Government in September 2020 to hear first-hand from current guardians and young people who have received support from a guardian.

As part of the commercial tendering process, an informal exercise took place in January 2021 for potential suppliers to note their interest in delivering the new service. **A commitment was subsequently made in the Scottish Government's**

Programme for Government 2021/22²⁹ to launch the service in the summer of 2022.

The next phase of work will be to launch the commercial tender and lay regulations for the new service. Whilst this work is underway the Scottish Government will continue to fund the SGS to provide a guardian to trafficked and unaccompanied children throughout Scotland.

Funding for the SGS to provide additional legal and practical support to unaccompanied children and young people, who are victims, or at risk, of trafficking has continued. Last year the service celebrated its **ten-year anniversary**, and to mark the occasion a members' debate was held in November 2020 at the Scottish Parliament. The debate was an opportunity for the Minister for Children and Young People, alongside fellow MSPs, to pay tribute to the service and the outstanding work it has delivered over the past 10 years, reaching over 700 children and young people across 29 local authorities.

“ I am truly grateful to TARA for their support to me and I feel it is the time to say goodbye. I wish the team all the best and I know that I can phone in the future if I have any questions.”

29 <https://www.gov.scot/publications/fairer-greener-scotland-programme-government-2021-22/>



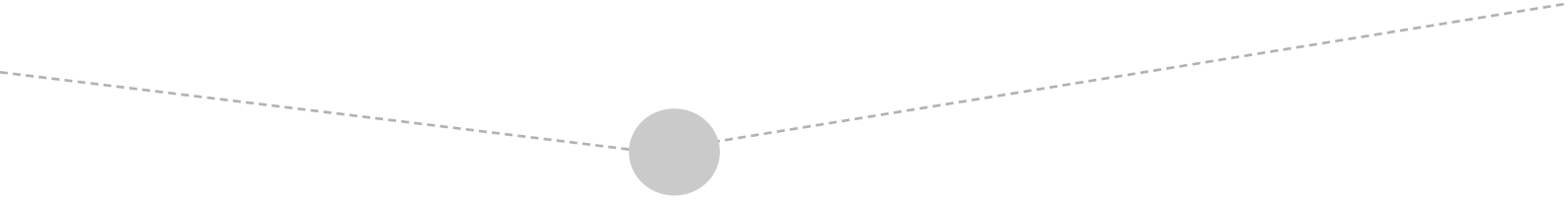
The SGS have also been successful in securing additional funding through the EU Asylum, Migration and Integration Fund (AMIF). The AMIF project **“Integrating Unaccompanied Asylum-Seeking and Trafficked Children into Scottish Communities”** has enhanced the service by increasing the number of Guardians available to deal with the escalating level of new arrivals and ongoing caseloads, extend integration support and deliver participation activities. This has included the expansion of the SGS **befriending service** which matches unaccompanied children and young people with a trained volunteer befriender to help support their recovery and reduce social isolation.

The AMIF fund has also enabled the growth of a **mental health project** to meet the needs of young people supported by the SGS in partnership with existing mental health services. In addition, newly arrived young people are also given supplementary support through two new **support workers** to help orientate vulnerable young people with their local area and promote integration.

A Home Office pilot programme **to devolve child decision-making within the National Referral Mechanism was launched earlier this year**. The Scottish Government and COSLA, alongside other key partners, have been working closely with Home Office on the roll-out of the pilot in Scotland. The purpose of the pilot is to test whether determining if a child is a victim of trafficking within existing child protection structures is a more appropriate model for making trafficking decisions for children.

Pilot sites were identified via a competitive process, which was open to all local authorities in the United Kingdom with responsibility for children’s social care. A diverse range of local authority areas across the UK were selected to be part of the pilot programme, allowing the model to be tested in different settings. **Glasgow City Council is one of ten selected pilot sites** and will be the only Scottish local authority involved. The Home Office has offered a package of support to each site which includes funding, training and technical expertise. A strategic working group has been created by the Scottish Government to support Glasgow City Council and operational partners with the roll-out of the pilot. The programme will be subject to a rigorous evaluation which is being overseen by an independently chaired evaluation panel.

NHS Greater Glasgow and Clyde Psychological Trauma Service (NHSGCC PTS) continued to provide **specialised mental health support to victims** and through the pandemic this moved to remote delivery. Further to this, the mental health Allies Group project has continued to be delivered remotely for another year in partnership with NHSGCC Psychological Trauma Service and SGS. This project has been developed to build individual and community resilience, providing young people who have been victims of trafficking with coping strategies to help them manage symptoms of trauma.



A range of training on identifying and supporting victims of trafficking was delivered remotely over the course of the last year. The Scottish Government funded the delivery of a series of training sessions for first-line practitioners on the updated **age-assessment practice guidance**.³⁰ The sessions were developed in partnership with COSLA and delivered by JustRight Scotland and Immigration Social Work Services. Six sessions were delivered over the course of the year and given their success, work is ongoing to deliver a similar series of training this year.

Following a public consultation, the Scottish Government published **National Guidance for Child Protection in Scotland 2021**,³¹ replacing the previous 2014 version. The guidance includes advice on identifying and supporting victims of child trafficking and exploitation and reflects learning from recent cases. Following publication, local areas are beginning to consider how to adapt and change local processes, procedures and practice and then subsequently implement those adaptations and changes. The Scottish Government has established a national implementation group to support this phase of work.

The Scottish Government continues to take forward work to implement **the United Nations Convention on the Rights of the Child** (UNCRC). In March 2021, the Scottish Parliament unanimously passed the UNCRC (Incorporation) (Scotland) Bill (the “Bill”) to incorporate the UN Convention on the Rights of the Child into Scots law to the maximum extent of the Scottish Parliament’s powers, signalling a revolution in children’s rights in Scotland.

On 12 April 2021, a reference of certain provisions of the Bill was made by the Attorney General and the Advocate General for Scotland to the UK Supreme Court. A hearing before the UK Supreme Court took place on 28 and 29 June 2021. On 6 October 2021, the Supreme Court ruled that certain parts of the Bill fall out with the competence of the Scottish Parliament. While the Supreme Court judgment means that the Bill cannot receive Royal Assent in its current form, the Scottish Government is urgently and carefully considering the most effective way forward for this important legislation.

30 <https://www.gov.scot/publications/age-assessment-practice-guidance-scotland-good-practice-guidance-support-social/>

31 <https://www.gov.scot/publications/national-guidance-child-protection-scotland-2021/>



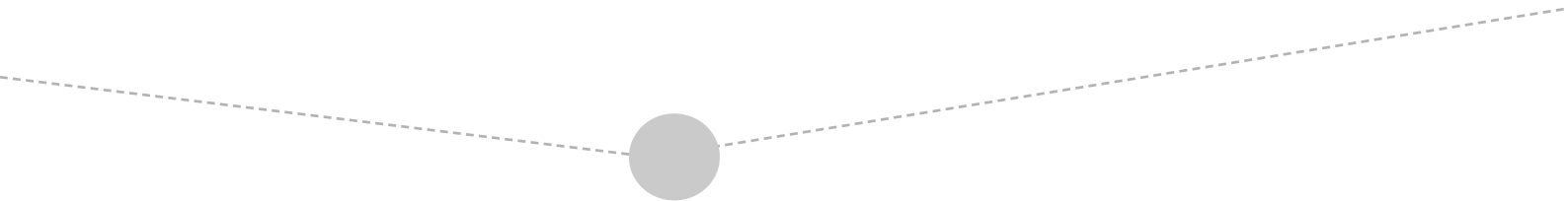
Action Area 2: identify perpetrators and disrupt their activity

Tackling human trafficking requires a multi-agency response. Police Scotland are continuing to develop the **Partners Intelligence Portal**, previously known as External Partners Portal, for Intelligence Collection, which is a secure and confidential electronic system that enables key partners to share important information they receive during the course of their work. As mentioned in the third annual progress report, the first pilot took place in the Highland and Islands, with training for the pilot provided to Barnardo's Scotland and Scottish Women's Football. After a review of the pilot and feedback from external and internal partners, training for the Portal will be improved and made available to other agencies.

Police Scotland, alongside Barnardo's, have also established a **Child Exploitation Operational Working Group** to improve training for frontline police officers to recognise the signs, risks and vulnerabilities of children and young people who have been, or are at risk of, being exploited. To help build a more accurate picture of child exploitation across Scotland, Police Scotland have developed a **data collection tool**. The information collected will be subject to analysis and good practice in managing and supporting children who have been exploited across Scotland and the rest of the UK will be shared with agencies.

The Scottish Government continues to fund and work with justice and social work agencies to improve the quality and process for **Joint Investigative Interviews (JIIs)** with vulnerable child witnesses. During 2020/21 a number of Sheriffdoms piloted the **new Scottish Child Interview Model** for JIIs. This new model is both trauma-informed and achieves best evidence through more robust planning and interview techniques.

The Divert Strand of Scotland's Serious Organised Crime Strategy aims to prevent exploitation of children and young people by serious organised crime and provide opportunities to divert them from such involvement. As part of this work, Action for Children's **Serious Organised Crime Early Intervention Service** is now operational in Edinburgh. The service aims to divert young people on the cusp of serious organised crime from a life of criminality and uses peer mentors to work with vulnerable young people to encourage them to make positive life choices. Plans are in development for the service to be expanded to Dundee.



In 2020 the Scottish Government published the final delivery report of the 2016 **National Action Plan to Prevent and Tackle Child Sexual Exploitation**.³² It set out the achievements and activity delivered over the last four years, in partnership with statutory and voluntary organisations, to strengthen Scotland's response to child sexual abuse and exploitation. The report also noted the range of ongoing efforts through Government-led and Government-supported work streams, in tackling these forms of child abuse. In particular, the report highlighted the impact and value of workshops and training delivered across Scotland since 2017 to raise awareness of child trafficking and encourage practitioners to share key learning in relation to local approaches to the care and protection of young people at risk of exploitation and trafficking.³³

“ I am feeling good. I want to give my deepest thank you for taking care of me, for listening to me and for guiding me.”

32 <https://www.gov.scot/publications/national-action-plan-prevent-tackle-child-sexual-exploitation-final-delivery-report/>

33 <https://www.celcis.org/knowledge-bank/search-bank/national-child-sexual-exploitation-workshops-evaluation-report>

Police Scotland have been working with Barnardo's Scotland on the **Reducing the Risk of Sexual Exploitation (RISE) project**. The partnership is working towards reducing risk, harm and impact of abuse and exploitation for children and young people. RISE supports police and partner agencies to identify, protect and support children and young people who have experienced abuse/exploitation or who are at risk of being harmed as well as the provision of direct support to children, young people and their families.

The Scottish Children's Reporter Administration (SCRA) and Barnardo's Scotland published research and a policy paper '**Sexual Exploitation of Children Involved in the Children's Hearings System**'³⁴ in October 2020. The research was the first national study on child sexual exploitation in Scotland. It reported on the prevalence and pathways of children into child sexual exploitation, as well as exploring whether child sexual exploitation is considered in the decision making by Children's Hearings for children who are victims of sexual exploitation. One of the recommendations from the report was for the Scottish Government to take responsibility for the recommendations in this report and assign their delivery to an appropriate national working group (either new or existing) with appropriate strategic oversight and accountability processes.

34 <https://www.scra.gov.uk/wp-content/uploads/2020/10/CSE-research-report-published-October-2020.pdf>



Following on from the research, in January 2021, SCRA and Barnardo's Scotland established the **Understanding Child exploitation in Scotland** (UCES) Group to raise awareness of all forms of child exploitation, gather the evidence base, increase collaboration, and influence and strengthen decision making. There is a wide range of membership from third sector, academics, operational partners and the Scottish Government. To mark child exploitation awareness day on 18 March 2021, a publicity campaign was launched by the group based around case studies highlighting different forms of child exploitation and the interconnections between them.³⁵

Action Area 3: address the conditions that foster trafficking and exploitation

The Trafficking and Exploitation Strategy identified the need to better understand routes into trafficking and exploitation for children in Scotland. In January 2018, the University of Stirling was awarded a Scottish Government proposal to undertake research on the routes into trafficking for children in Scotland. Ahead of Anti-Slavery Day 2020, **research on Child Trafficking in Scotland**³⁶ was published. The report examined the routes and circumstances of children and young people who had been identified as victims of trafficking in Scotland and the response by professionals to support and care for

them. Importantly, the research included interviews with trafficked children and young people in Scotland and these first-hand accounts will inform how Scotland continues to improve the support and services available for child victims.

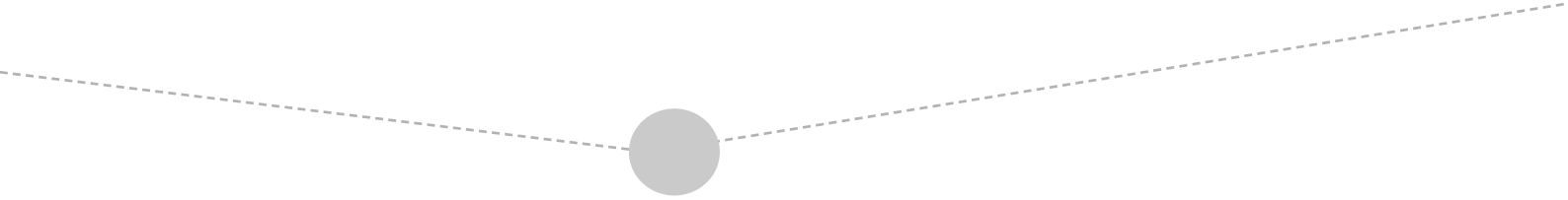
Response to COVID-19

The responsibility for child trafficking victims remained with local authorities throughout the pandemic. Collaboration was developed across education, health, social work and the third sector. Local partnerships reviewed local child protection processes whilst quickly adapting and re-prioritising services. Chief Officer Groups oversaw local public protection arrangements and the assessment and response to risk, vulnerability and protection across the 32 local partnerships. In addition, strong connections have been maintained with individual families through the Family Nurse Partnership Programme and our Health Visiting workforce.

“ The TARA Team have been amazing and I have felt so supported during my darkest moments – thank you!”

35 <https://www.scra.gov.uk/2021/03/child-sexual-exploitation-awareness-day/>

36 <https://www.gov.scot/publications/child-trafficking-scotland-research/>



To help ensure vulnerable children, including child victims of trafficking, received appropriate support and protection the Scottish Government published the Coronavirus (COVID-19) **Supplementary National Child Protection Guidance**³⁷ and made provisions in emergency legislation. The guidance is intended to support child protection leadership and provides advice about streamlining current processes to take account of challenges without compromising actions to protect children.

This guidance is complemented by the work of the **COVID-19 Children and Families Collective Leadership Group**³⁸ (CLG) which brings together national and local government and a range of other partners across Children and Families Services, Health, Education, Justice and the Third Sector. The Group's work primarily focuses on children, young people and families experiencing vulnerabilities and those on the edges of becoming vulnerable.

The Scottish Government has aimed to develop a holistic, evidence-based approach to the needs of children and young people who are at risk during the pandemic. Regular data collection provides intelligence to CLG, bringing together intelligence from the 32 Chief Officer Groups and national agencies and delivery partners including the third sector, Police Scotland and the NHS. The dataset includes key data on what is happening to support children and young people on the child protection register, those looked after and those on the edge of care. A second data set covering a range of aspects of adult protection has been established to help provide a broader picture on related issues such as domestic abuse, substance misuse and specific vulnerable populations.

Throughout this period, the Scottish Government has continued to work with the Home Office, COSLA, and other key stakeholders to address emerging issues for children and young people who have been a victim, or are at risk, of trafficking. Part of this engagement has included exploring quarantine arrangements within local authorities; travel and social-distancing arrangements; and tackling digital inclusion issues for young people. The SGS has continued to support young people in-person and remotely to help ensure sufficient support was in place.

37 <https://www.gov.scot/publications/coronavirus-covid-19-supplementary-national-child-protection-guidance/>

38 <https://www.gov.scot/groups/covid-19-children-and-families-collective-leadership-group/>



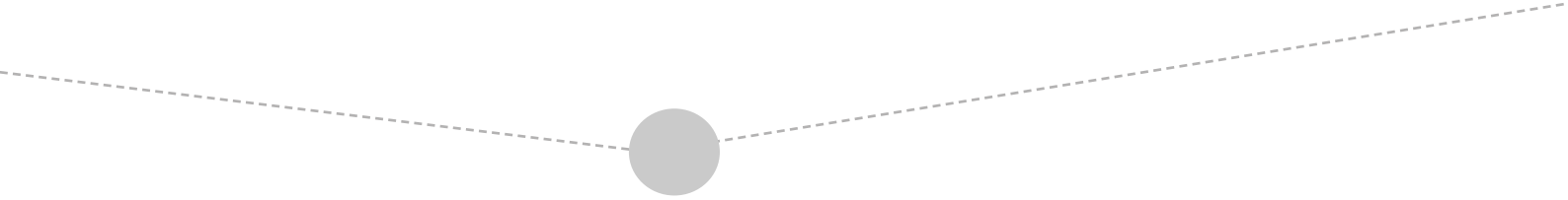
Digital inclusion was a priority for this cohort of vulnerable young people since access to a digital device was key to ensuring appropriate support online from essential services and enabled many to attend online classes or remote appointments. To support our digital inclusion efforts, the Scottish Government invested £15 million as part of Phase 2 of the **Connecting Scotland programme** to help 23,000 households, including care leavers up to the age of 26, get online. With regard to school-aged learners, the Scottish Government invested £25 million to tackle digital exclusion when learning from home, and for post-school learners, a £5 million **Digital Inclusion Fund** was launched through the Scottish Funding Council.

This fund was specifically for further education students experiencing financial hardship and aimed to assist them purchasing additional equipment for studying remotely. Early in 2020, the Scottish Funding Council relaxed its guidance on the use of bursary funding, to allow colleges to use these funds to address digital poverty. An additional £5 million was announced as part of the allocation of student support in February 2021, which colleges can use to provide more students with IT equipment and technology as well as other student support-related purposes.

The pandemic has led to children and young people spending increasingly more time in the digital environment for learning and socialising. This led to an increased governmental focus on **online risks and ways in which young people could be exploited online**.

A range of activity to support children and young people, their parents, carers and professionals working with children in being more resilient online had been ongoing prior to COVID-19. In early 2020 the Government rapidly increased efforts to support **awareness raising of online risks** and signposting to resources, guidance and materials with partners including Young Scot, Crimestoppers, Barnardo's Scotland, Education Scotland, Police Scotland and the National Crime Agency. A **coronavirus hub was launched on the Parent Club webpages**, providing help, advice and guidance to parents and carers, as well as launching a marketing campaign promoting messaging through channels including TV, radio and digital.

In March 2021 the **Scottish Government invested in renewed awareness raising activity focussed on online risks to children and young people**. This included a Government-led campaign focused on better identifying signs of child exploitation, supporting a Child Protection Committees (CPC) Scotland campaign aimed at parents and carers to be actively interested in their children's online activity and supporting Police Scotland enforcement activity, which included a campaign targeting potential



perpetrators.³⁹ Evaluation of this public messaging activity revealed that the Scottish Government's digital and social media adverts were seen 8.4 million times; the reach of CPC Scotland content on social media channels led to 180,000 views on Facebook, 226,000 on Twitter and Instagram posts seen 6,000 times; while Police Scotland's TV activity resulted in an estimated 10 million impressions.

Looking forward

The CTSG will continue to build on the progress made throughout this year and will prioritise responding to emerging trends from the COVID-19 pandemic.

Part of this work will include developing a series of workshops for practitioners to help raise awareness on child exploitation and trafficking in Scotland; funding training on implementation of the revised age assessment guidance; working with COSLA and the Home Office on the scaling up of the National Transfer Scheme; and continuing to work with the Home Office on the roll-out of pilots across the UK, including Glasgow, to test the devolution of NRM decision-making for children to local authorities, and the wider implications for Scotland.


The CTSG will continue to strengthen links with the Divert Strand of the Serious Organised Crime Strategy and the upcoming Youth Justice Vision to address child exploitation in a more holistic way. A briefing paper is planned for dissemination to practitioners on criminal exploitation of children, young people and adults which will open up a national conversation on child criminal exploitation.

A joint campaign between Barnardo's Scotland, Fearless and Police Scotland regarding child criminal exploitation will be promoted. Using real-life anonymised case studies provided by Barnardo's Scotland, the campaign will tell the story of how three young people were exploited.

Review the findings from the Council of Europe's Group of Experts on Action against Trafficking in Human Beings (GRETA) Third Evaluation Report on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings in the UK, including in Scotland.

The new Independent Child Trafficking Guardians service will launch in summer 2022 and as part of this the Scottish Government will be taking forward a commercial tender and laying the necessary regulations.

³⁹ <https://csethesigns.scot/>



The Scottish Government remains committed to the incorporation of the United Nations Convention on the Rights of the Child to the maximum extent possible as soon as practicable⁴⁰ and the majority of work in relation to implementation of the UNCRC can proceed and is continuing at pace.

Through the implementation of the UNCRC the rights of all children should be fully realised and protected. Between now and March 2024 we will invest £4m per year over three years to support the delivery of a fundamental shift in how children's rights are considered and implemented in Scotland, including for child victims of trafficking. Respecting, protecting and fulfilling children's rights is central to our commitment to #KeepThePromise and to Getting It Right For Every Child (GIRFEC), which will continue to underpin how we love, care for, and support all children and young people in Scotland.

The CTSG will continue to closely assess the UK's New Plan for Immigration and Nationality and Borders Bill as it continues its parliamentary passage. We will consider the impact on devolved age-assessment competencies and wider reforms on modern slavery which may impact child victims of trafficking and exploitation in Scotland.

“Your service is excellent. I cannot think of anything to help you improve your service.”

40 <https://www.gov.scot/news/pledge-on-childrens-rights/>

Section 5

Measures

Measure	Definition	2020/21 data
Identify victims and support them to safety and recovery		
Number of potential victims identified	All victims (adults and children) who entered the NRM and (in due course) those identified through the 'duty to notify' process	<p>The full 2020 annual report was published by the Home Office Single Competent Authority in March 2021, including a breakdown of referrals from Scotland:</p> <p>https://www.gov.uk/government/statistics/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2020</p> <p>Key figures for Scotland in 2020:</p> <p>Total referrals: 387</p> <p>59% of all cases reported to the National Referral Mechanism in 2020 in relation to Scotland included indicators of labour exploitation.</p> <p>The most common nationality of victims was Vietnamese (96), UK (41) and Chinese (37).</p>

Measure	Definition	2020/21 data
Identify victims and support them to safety and recovery		
Number of adult victims provided with support	Reports from the support provider	<p>TARA supported 95 women over the course of 2020/2021, of those 57 were newly identified during the year.</p> <p>26 women were provided with crisis accommodation and no women were repatriated due to COVID travel restrictions. However, 3 women were supported to return or relocate elsewhere in the UK.</p> <p>On the 31 March 2021 TARA had:</p> <ul style="list-style-type: none"> • 58 open cases; • All women had been referred into the NRM and granted a positive Reasonable Grounds (RG) Decision; • 6 had received a positive Conclusive Grounds (CG) Decision but still required ongoing support; • 52 CG Decisions outstanding; and • 37 cases were closed during 2020/21 <p>The average length of support for the 58 open cases was 9 months with support times ranging from 20 months to a few days. The average length of support for the 37 closed cases was 13 months with support times ranging from 24 months to less than a month.</p> <p>Scottish Government funding enabled TARA to directly provide 43 women with unlimited internet data for 12 months and to issue 35 'smart' phones. TARA also supported 20 women to access a Chrome Book or iPad with 12 months unlimited data via the Connecting Scotland fund in June 2020 and successfully applied on behalf of 30 women for smart devices (phone/laptop/tablet) with unlimited data for 12 months via the Victim Support Scotland fund throughout the year. This means that a total of 93 women using TARA's service have been enabled to access online supports such as legal advice, health appointments, ANCHOR services, AMMA birth companions, ESOL classes and support access to education for children, along with accessing other formal and informal support groups during periods of lockdown.</p>

		<p>Women have told TARA digital access has significantly improved their access to services (including TARA), helped reduce social isolation and improved their feelings of well-being and safety. The TARA team report that more women initiate contact with TARA and the use of emojis or online translation apps mean that their confidence to proactively communicate with TARA has increased.</p> <p>Migrant Help supported 388 clients during 2020/21, including 259 new clients,</p> <ul style="list-style-type: none"> • 22 cases where a positive CG Decision was made; • 3 cases where a negative CG Decision was made; • 6 cases where a negative RG Decision was made; • 4 cases where the client decided to leave Scotland; • 13 cases where the client absconded; • 3 cases where the client was repatriated; • 61 cases where the CG Decision was outstanding and the support level was low; • 49 cases where the CG Decision was outstanding and the support level was high. <p>The average length of support provided in 2020/21 was 202 days, which was substantially longer than 2019/20 (138 days) and can be attributed to additional support measures put in place as a consequence of COVID-19.</p>
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Measure	Definition	2020/21 data
Number of trafficked or exploited children supported through the child protection system	This will be based on the returns already provided to the Scottish Government by local authorities	In March 2021, the Children's social work statistics: 2019 to 2020 - gov.scot (www.gov.scot) were published. The publication outlines the latest data on children and young people who are looked after, on the child protection register or in secure care in Scotland. The number for the child trafficking indicator is grouped within the "Other Concerns" category in the publication.
Number of children who are allocated an independent child trafficking guardian (ICTG)	Number of children who receive the support of an ICTG	<p>The Scottish Guardianship Service provides additional support for children and young people who have been trafficked, and for whom no-one in the UK holds parental responsibilities.</p> <p>At 31 March 2021, the Scottish Guardianship Service was supporting 290 young people across Scotland. Between 1 April 2020 and 31 March 2021, 94 children and young people were referred to the service, including 9 through the National Transfer Scheme.</p> <p>The Scottish Government's Programme for Government 2021/22 included a commitment to launch the Independent Child Trafficking Guardian (ICTG) service in the summer of 2022.⁴¹</p>

41 <https://www.gov.scot/publications/fairer-greener-scotland-programme-government-2021-22/>

Measure	Definition	2020/21 data
Identify perpetrators and disrupt their activity		
Number of individuals convicted for the offences	Persons convicted in that year under section 1 and section 4 of the Act and also under earlier legislation (section 22 of the Criminal Justice (Scotland) Act 2003, section 4 of the Asylum and Immigration (Treatment of Claimants etc.) Act 2004 and section 47 of the Criminal Justice Licensing (Scotland) Act 2010	Nil
Number of individuals convicted of offences with a human trafficking background	Convictions using the aggravations set out in sections 5, 6 and 7 of the Act in that year	Nil
Number of orders made under Part 4 of the Act	Orders made in that year using the powers in Part 4 of the Act	Nil

Measure	Definition	2020/21 data																																										
Identify perpetrators and disrupt their activity																																												
<p>Public awareness of the issue of human trafficking and exploitation</p>	<p>Questions in public survey conducted annually</p> <p>The research in the first four waves was conducted using a face-to-face, in-home, CAPI Omnibus survey – the Scottish Opinion Survey (SOS) – as the method for data collection. Six waves of research have now been conducted:</p> <ul style="list-style-type: none"> • Wave 1 (2017) A sample of 1,025 adults aged 16+ was interviewed across Scotland between 1 and 26 March 2017. • Wave 2 (2018): A sample of 1,008 adults aged 16+ was interviewed across Scotland between 28 February and 2 April 2018 • Wave 3 (2019): A sample of 1,082 adults aged 16+ was interviewed across Scotland between 20th February and 20th March 2019. • Wave 4 (2020) A sample of 317 adults aged 16+ was interviewed between 4th and 10th March 2020 • Wave 5 (2020) A sample of 1,006 adults interviewed online between 2nd and 6th April 2020 • Wave 6 (2021) A sample of 1,000 adults interviewed online between 17th and 24th March 2021 	<p>Percentage of respondents stating that Human Trafficking is a problem ‘to a great extent’ in each area:</p> <table border="1" data-bbox="788 443 1469 891"> <thead> <tr> <th></th> <th>2017 %</th> <th>2018 %</th> <th>2019 %</th> <th>2020 F2F %</th> <th>2021 Online %</th> <th>2022 Online %</th> </tr> </thead> <tbody> <tr> <td>Europe</td> <td>53</td> <td>59</td> <td>58</td> <td>60</td> <td>41</td> <td>45</td> </tr> <tr> <td>Rest of the world (not including Europe)</td> <td>63</td> <td>69</td> <td>67</td> <td>72</td> <td>60</td> <td>57</td> </tr> <tr> <td>The UK</td> <td>30</td> <td>34</td> <td>30</td> <td>35</td> <td>23</td> <td>25</td> </tr> <tr> <td>Scotland</td> <td>14</td> <td>16</td> <td>13</td> <td>13</td> <td>14</td> <td>15</td> </tr> <tr> <td>Your local area of Scotland</td> <td>5</td> <td>4</td> <td>5</td> <td>4</td> <td>8</td> <td>8</td> </tr> </tbody> </table> <p>The full 2021 survey report can be found at http://www.gov.scot/ISBN/9781802017717/documents/.</p>		2017 %	2018 %	2019 %	2020 F2F %	2021 Online %	2022 Online %	Europe	53	59	58	60	41	45	Rest of the world (not including Europe)	63	69	67	72	60	57	The UK	30	34	30	35	23	25	Scotland	14	16	13	13	14	15	Your local area of Scotland	5	4	5	4	8	8
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Measure	Definition	2020/21 data
Infrastructure and partnership working		
<p>Numbers of statutory bodies that have specific referral mechanisms for human trafficking and exploitation within their organisation and using them</p>	<p>Self-reporting through the Strategy Implementation Group</p>	<p>Section 38 of the Human Trafficking and Exploitation (Scotland) Act 2015 places a duty on Scottish public authorities to notify the Chief Constable of Police Scotland about a person who is, or appears to be, a victim of an offence under the Act. Notifications must not contain any information which could identify individuals unless consent has been given to do so.</p> <p>The public consultation in respect of the duty launched on 16 June 2019 and ended on 6 September 2019.</p> <p>The analysis report for the public consultation on section 38 of the Human Trafficking and Exploitation (Scotland) Act 2015: Duty to notify and provide information about victims, was published on 30 April 2020. The report can be accessed at the link below: https://www.gov.scot/isbn/9781839606908/</p> <p>The implementation of section 38 has been delayed due to the ongoing response to Covid-19 and the continuing impact on public services.</p>
<p>Number of organisations (statutory and non-statutory) within Scotland that have action plans or similar that contribute to delivering the overall aims of the Strategy</p>	<p>Self-reporting through the Stakeholder Forum arrangement</p>	<p>Slavery and Human Trafficking Guidance for Businesses was published by the Scottish Government in October 2018 in order to help organisations identify and prevent human trafficking and exploitation across their operations.</p> <p>Following the Independent Review of the UK's Modern Slavery Act 2015, the Home Office held a public consultation from July-September 2019 around reforms to the obligation on businesses to produce and publish Slavery and Human Trafficking Statements. The Scottish Government supported this process, including hosting a joint session with the Home Office and Scottish stakeholders to ensure their views were captured.</p> <p>The Scottish Government has supported the creation of Scotland Against Modern Slavery (SAMS) alongside Shan Saba, a director with Brightwork Recruitment. The development of SAMS will help inform and share best practice about human trafficking and exploitation throughout the business community in Scotland.</p>



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