

Northumberland Modern Slavery, Trafficking and Exploitation Concept of Operations

(Including Victim Reception Centre Guide to Operation)

Agreed by:

Northumbria Police	Northumberland County Council	Northumberland Clinical Commissioning Group
British Red Cross	Cumbria, Northumberland, Tyne and Wear NHS Foundation Trust	Northumberland Safeguarding Adults Board

Purpose of the Plan

1



Aim and Objectives	2
Multi-agency strategic aim	2
Northumbria Police working strategy	2
Multi-agency operational objectives	2
Roles and Responsibilities	3
Northumbria Police	3
Hope for Justice	4
Salvation Army	4
British Red Cross	4
NHS England	4
Northumberland County Council	5
MDS Procedural Framework	6
Implementation	7
Definitions	7
Decision making	8
Working strategy	8
Access to services	8
Council considerations	10
Escalation process	12
Response level criteria	13
Identify options and contingencies	14
Appendix A - Consider powers, policies and procedures	19
Appendix B	25
NHCFT Flowchart response to Modern Day Slavery (MDS) and Human Trafficking (accompanies multi-agency guidelines)	25
Appendix C - Joint Decision Making Model	26
Appendix D - Joint understanding of risk	27
Appendix E –The National Referral Mechanism	28
Appendix F- Key Contacts	28
Appendix G Victim Reception Centre Guide to Operation (DRAFT)	30

Purpose of the Plan

The purpose of the Northumberland Modern Slavery, Trafficking and Exploitation (MSTE) Concept of Operations (ConOps) is to provide a framework that supports a

multi-agency approach to supporting people who have been subject to slavery, trafficking and exploitation.

The ConOps will:

- Describe agreed single and multi-agency aims and objectives;
- Consider the response to MSTE within Joint Decision Model processes;
- Identify appropriate powers, policies and procedures;
- Describe access routes to agency services;
- Provide an indicative menu of council services available to victims of MSTE;
- Support the activation and staffing of a Victim Reception Centre; and
- Ensure multi-agency organisations incorporate this within their own emergency plans.

Aims and Objectives

Multi-agency strategic aim

To respond to offences of Modern Slavery, Trafficking and Exploitation (MSTE) within the Northumbria Police Area through the delivery of a multi-faceted and targeted response.

Northumberland County Council (NCC) strategic aim

NCC strategic aim is to provide appropriate support to people who have been identified as having been victims of MSTE within Northumberland and fulfil appropriate statutory duties.

Northumbria Police working strategy

The strategic aims for Modern Slavery Operations are based on the intention to:

- Investigate and prosecute individuals who exploit people by means of modern slavery and support those who are its victims. To achieve this, operations will:
- Rescue and safeguard victims
- Respond in such a manner as to increase the opportunities for evidential accounts and improve their lives significantly through the provision of an appropriate humanitarian response

Multi-agency operational objectives

The multi-agency objectives are to:

1. Formulate and deploy a multi-agency approach that minimises the risks faced by as yet unidentified victims of MSTE through:
 - a. Effective safeguarding
 - b. Support of initial and on-going welfare needs

- c. Collection of evidence and a comprehensive investigation
 - d. Ensure that the victims most basic needs are met; this may mean accessing money for clothes, a hot drink, food and other basic essentials
2. Develop and implement a victim strategy that will provide professional, and if appropriate specialist support to victims;
 3. Convene and support a Victim Reception Centre (VRC) if people cannot be housed within council emergency accommodation either because of their social needs or numbers;
 4. Coordinate and manage investigations, ensuring that relevant evidence, intelligence and information relating to those investigations is appropriately linked to maximise investigative opportunities;
 5. Identify and bring to justice offenders that are linked through evidence and analysis to victims of MSTE;
 6. Ensure the impact on communities resulting from reports of Modern Slavery are properly assessed and that supporting actions are put in place through a Community Tension Assessment and Engagement Plan to mitigate the identified risks;
 7. Ensure that effective response and communication plans are in place to manage any approaches to agencies from other victims, offenders, witnesses and concerned members of the public;
 8. Engage partner agencies to provide specialist advice and support;
 9. Ensure all agencies are properly briefed and kept updated;
 10. Develop and implement communication to address the requirements of the victims, the investigation, partner agencies, public reassurance and community confidence;
 11. Ensure that public confidence is maintained in the responding agencies through the deployment, conduct and professionalism of properly trained and suitably experienced staff;
 12. Ensure that organisational and individual learning is identified and disseminated at an appropriate juncture; and
 13. Ensure the response to MSTE is undertaken within legislative and policy framework and consider powers, policies and procedures ([Appendix A](#))

Roles and Responsibilities

Northumbria Police

- Overall lead of the operation and investigation
- Lead and manage the Victim Reception Centre
- Liaise within the Major Incident Room (if operational)
- Lead the Tactical Coordinating Group
- Ensure that regular briefings are made to update people as to what is happening

- Coordinate public messaging and community engagement
- Contact all members of the Joint Engagement Group with information relating to the incident to support the reassurance, enforcement and engagement process

Hope for Justice

- Provide appropriate support for people who have been subject of MSTE
- Inform the practice of all agencies providing services within the Victim Reception Centre

Salvation Army

- Responsible for delivery of the Modern Slavery Victim Care Contract (MSVCC) - will provide accommodation, support and outreach support services to adult victims of modern slavery and human trafficking and their dependents in England and Wales. It will ensure the safeguarding and protection of victims, providing flexible support tailored to individual recovery needs to those in the National Referral Mechanism.

British Red Cross

- Provide welfare, emotional wellbeing and first aid to victims within the Victim Reception Centre

NHS England

- Identify and activate appropriate health resources for the Victim Reception Centre (e.g. nurse practitioners, community nurses, GPs etc.)
- Address the immediate health needs of victims at the Victim Reception Centre
- Provide support in accessing replacement medication
- Liaise with the wider health economy and social care to support survivors as necessary, particularly those deemed to be more vulnerable

Northumbria Healthcare NHS Foundation Trust (NHCFT)

- Not all victims will require medical treatment if they attend hospital. However, in the event people come into the Emergency Hospital or Urgent Care Centre for emergency or urgent physical treatment then they will be medically treated accordingly.
- The trust has a Special Point of Contact and on-call managers are available
- The trust will report any cases to the police and ensure any victims stay within the department until police arrive (utilising side rooms and providing comfort). (See Flowchart at [Appendix B](#))

NHS Northumberland Clinical Commissioning Group

- Where it is identified that a victim requires support from a GP or other primary care providers the CCG will support access to an appropriate service

- The CCG has a Special Point of Contact within the Safeguarding Team
 - Contact number 01670 335160, between Monday to Friday 9am - 5pm.
 - Out of hours Northumberland OneCall 01670 536400.
- The CCG will support primary care providers to ensure that any cases are reported to the police and local guidance followed. Also ensure the victim stays within the location of the service until police arrive (utilising side rooms and providing reassurance and comfort).

Northumberland County Council

Adult Social Care/MASH

- Undertake an initial social care assessment for adults where necessary with referrals to Mental Health, Deprivation of Liberty Safeguards or Safeguarding Teams if required
- Adult Social Care would respond to human rights acts assessment for those who have no recourse to public funds and care act assessments for those who meet the threshold eg mental or physical impairment/condition or are elderly and an appearance of need (social care need not housing) or health.

Children's Services /MASH

- Undertake safeguarding and social care enquiries for children where necessary and to undertake an assessment of need if applicable

Media Team

- Coordination of an external media response in conjunction with the lead agency if appropriate
- Monitoring of social media

Community Safety Team

- Contact all members of the Community Tensions Monitoring Group with information relating to the incident to support the reassurance, enforcement and engagement process
- Depending upon the nature/severity of the issues, in conjunction with the police, undertake a Community Tension Assessment
- Identify how to provide feedback to communities and consider actions designed to improve community cohesion
- Coordinate the opening of a rest centre if required

Emergency Duty Team

- Provide the Council's out of hours social care service for both adults and children (OneCall)

Environmental Health Team

- Undertake environmental health inspections of private rented properties
- Initiate any actions with the Trading Standards Team around the proceeds of crime implications

Housing Services

- Provide free, confidential and impartial advice for people in housing need, in a potentially homeless situation or simply wishing to access different types of housing
- Identify appropriate accommodation for victims if required
- Liaise with Adult Social Care if there is no statutory provision for a Human Rights Assessment to be undertaken looking at additional rights that someone may have

Civil Contingencies Team (CCT)

- Activation of Northumberland County Council's (NCC) Emergency Community Assistance Plan (ECAP) in conjunction with any other relevant specific contingency plans (as required)
- Provide support to the on duty Corporate Leadership Team member
- Provide a central point of coordination on behalf of NCC
- Receive, co-ordinate and disseminate information regarding the emergency situation to responding organisations

The CCT operates a 24 hour out of hours scheme - Duty Civil Contingency Officer (DCCO)

The DCCO can be contacted any time through Fire Control on Tel **01670 627 599** (ask for the DCCO to be contacted)

If this fails the DCCO can be contacted through the Contact Centre on **0345 600 6400** (ask for the DCCO to be contacted)

As a last resort, if the above numbers fail, the DCCO can be contacted through Police Control on **03456 043 043** or **101** (ask for NCC DCCO to be contacted)

MSTE Procedural Framework

Gather information and intelligence

Preparation

Northumbria Police will lead on the gathering and analysis of intelligence relating to MSTe operations. This information will be shared with partner agencies in a timely and appropriate manner.

If other agencies become aware of information relating to MSTE during the course of their everyday activities, it should be reported to the Police Operation Sanctuary Hub on 101 x 62553 or 101 x 66442 or, **if in immediate danger, 999.**

During a Critical or Major Incident, or in the preparation phase of a planned operation, the Resilience Team will coordinate data and intelligence sharing between council services, partner agencies and Northumbria Police.

Implementation

When responding to an ad-hoc report of MSTE, information and intelligence will be shared and stored using business as usual processes.

During a planned operation, or following the declaration of a Critical or Major Incident, information and intelligence gathering from within the council will be coordinated by the COR and shared with S/TCGs through the Northumberland County Council Major Incident Coordinator (MIC).

Information sharing controls

Any information shared between agencies to support this operation will become the responsibility of the receiving organisation's Data Controller.

Assess risks and develop a working strategy

It is acknowledged that each responding agency sees, understands and treat risks differently therefore each must undertake a slow time risk assessment for their own staff in connection with MSTE. They must also develop their own mitigation processes.

If residual risks are left following agency level mitigation, the risk assessment should be shared with partners, enabling the development of joint control measures and contingency arrangements.

Definitions

If incidents occur as a result of MSTE action, agencies recognise that a Major Incident is defined as being:

An event or situation with a range of serious consequences which requires special arrangements to be implemented by one or more emergency responder agency

Agencies should maintain oversight of their staff risk exposure by:

1. Identifying hazards e.g. risks to personal safety, safety of other, property and equipment and agency reputation
2. Carrying out dynamic risk assessments and communicating these across the responding agencies

3. Ensuring actions undertaken by agency officers are within their area of personal expertise and agency responsibility
4. Working towards developing an environment where the risks people face are as low as reasonably practicable
5. Operating as part of a multi-agency
6. Recording decisions, and the information used to make them, contemporaneously within notebooks and/or incident logs
7. Reflecting the burden placed on staff within appropriate risk registers

Decision making

Single and multi-agency decision making will follow this general pattern of the Joint Emergency Services Interoperability Programme (JESIP) principles:

- Working out what's going on (situation)
- Establishing what needs to be achieved (direction)
- Reflecting on operational and agency values and purposes (ethics)
- Deciding what to do about it (action)

These activities will be supported by the Joint Decision Model (JDM) of the JESIP Framework ([Appendix B](#) and [Appendix C](#)).

Working strategy

The strategic aim for Modern Slavery Operations is based on the following intention:

- To investigate and prosecute individuals who exploit people by means of modern slavery and support those who are its victims

To achieve this operations will:

- Rescue and safeguard victims
- Respond in such a manner as to increase the opportunities for evidential accounts
- Support people who have been victimised and improve their lives significantly through the provision of an appropriate humanitarian response
- Collect evidence to support prosecutions

Access to services

People who have been subjected to MSTE are likely to require support from statutory agencies to transition from a position of exploitation towards regaining control of their decisions and actions. Each case is considered individually, and the type of support available to people from within and outside the European Economic Area will depend on whether they have access to support from the public purse.

Accessing Northumberland County Council Services

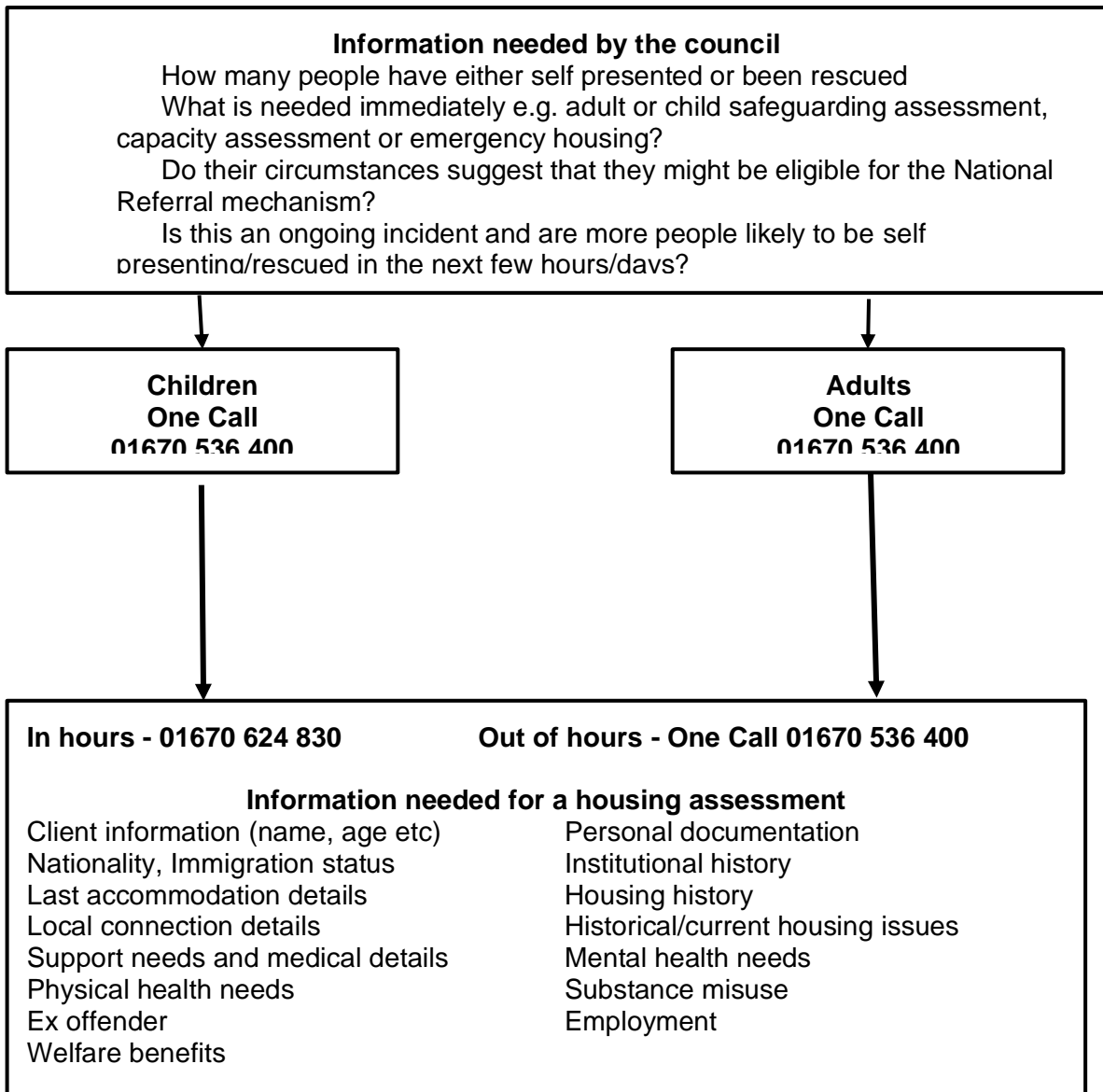
Victims of MSE may present in a number of different ways:

- Self-presentation to a statutory or voluntary agency

- Agency identification through their normal business activities e.g. Police investigations, environmental health visits to premises, concerns identified by visiting professionals
- Multi-agency road traffic collision response
- Supply chain transparency investigations
- Discovery during an organised Police strike

It is the responsibility of the presenting organisation to inform Northumbria Police of the situation through business as usual routes. If local authority support is required, the following contact processes should be used whether issues are reported during working hours, out of hours or as part of a Major Incident or Emergency Situation.

Accessing council support



Council considerations

Following a request for council support for people thought to be victims of MSTE, the point of contact within Initial Response Service, Adult Social Care or the Emergency Duty Team should consider the following issues:

1	How many people require support and what assistance is required?	
2a	Does the requested support require recipients to be eligible for access to the public purse?	
2b	If the victim doesn't have recourse to public funds, what support can be provided	

3	What timescale are Northumbria Police working to:	
3a	Evidence of trafficking and/or exploitation has been discovered during unrelated police activity and the victim (s) require immediate social care support – Immediate support is required	
3b	People have self-presented and require emergency housing and/or social care whilst investigations are on-going – Urgent support is needed, but people are in a place of safety	
3c	People have self-presented and their condition requires immediate health interventions and subsequent council support – Support is needed but people’s immediate needs are being met	
3d	An urgent police strike is expected to take place within the next few hours – Planned support is needed for potentially large numbers of people about whom little is known	
3e	A planned police strike is expected to take place within the next few days – Planned support is needed for potentially large numbers of people about whom some is known	
3f	For each service involved in the delivery of the requested actions consider the following questions Can the support be provided with currently deployed resources? If it can't:	
3fa	<ul style="list-style-type: none"> • where can additional resources be found 	
3fb	<ul style="list-style-type: none"> • who needs to agree to the reallocation or procurement or additional resource 	

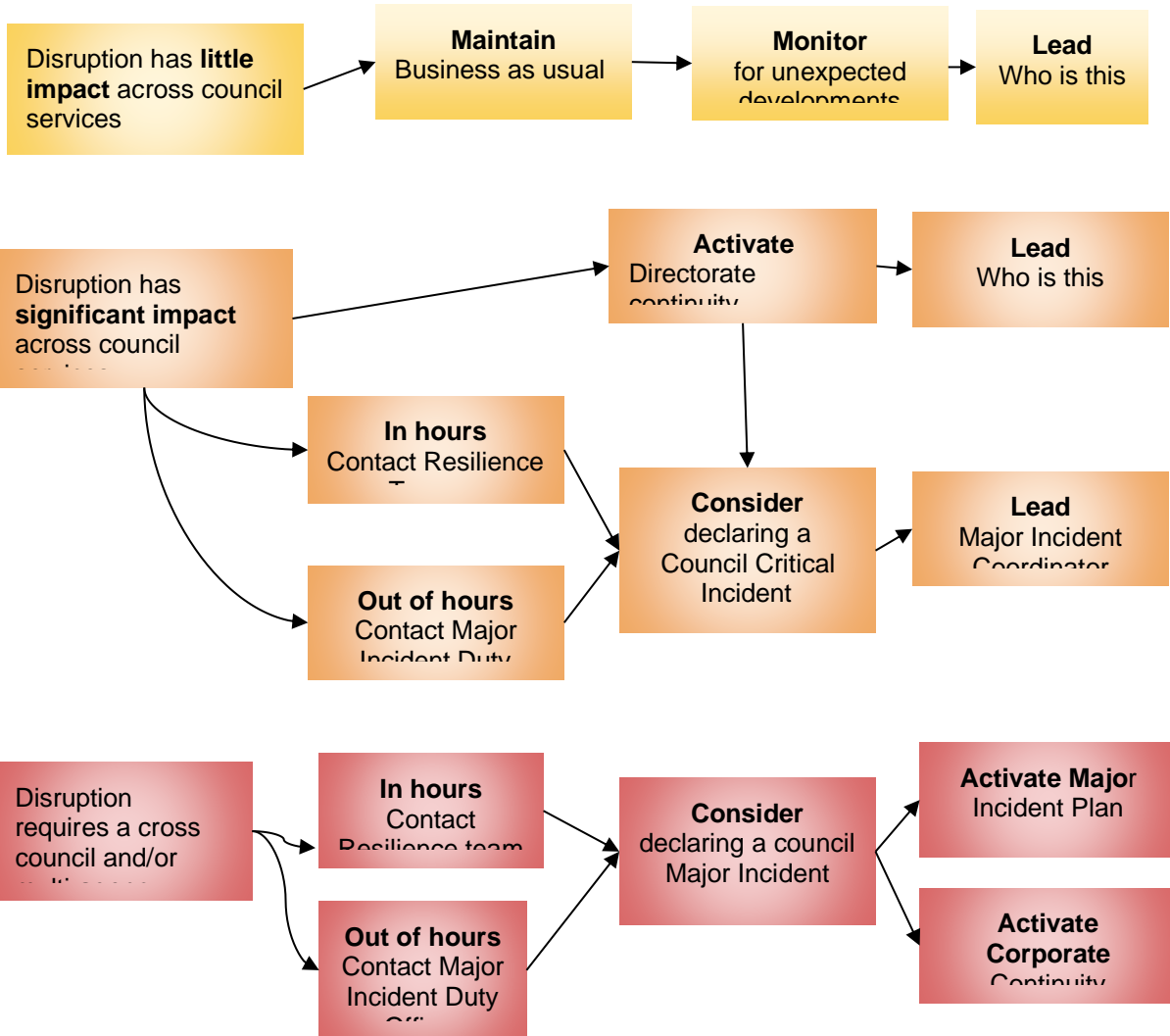
3fc	<ul style="list-style-type: none"> how long would it take for the resources to be made available 	
4a	What could be the impact on business as usual be if the requested level of support was provided?	
4b	If the impact is significant , consider whether existing continuity arrangements provide appropriate resources to maintain agreed service levels	
4b	Identify who can sign off the:	
	acceptance of a time limited reduction of council services in line with agreed continuity or surge plans	
	offer of reduced support that would not compromise our statutory obligations	
	refusal of requested support to Northumbria Police	
4c	Consider contacting the Major Incident Duty Officer to declare a Critical Incident if the support needed cannot be fulfilled by business as usual or a corporate response is required due to the size and nature of the request	
5	If the impact is moderate discuss the potential for the incident to escalate with Northumbria Police and service managers and consider preparing to provide for increasing or prolonged support	

Escalation process

The diagram below shows the council's modern slavery and trafficking response from business as usual to a major incident response. It does not apply to planned multi-agency operations.

Manager requested to respond to a report of modern slavery and/or

Assess the potential
 Number of victims; Speed of response required
 Resources needed to support those affected



Response level criteria

(Please read in conjunction with the Escalation Process)

To support decision making when deciding whether to declare a Critical or Major Incident, please consider the statement and criteria below.

To support people who have been rescued from trafficking or modern slavery

0 The council will respond using business as usual resources

1 The council's response could impact the delivery of a critical function or across two or more services

2 The council considers it necessary or desirable to act to prevent, reduce, control or mitigate the emergency's effect, or otherwise to action

3 The council is unable to act without changing the deployment of its resources or acquiring additional resource

Criteria 0	Business as usual
Criteria 1	Critical Incident (Continuity)
Criteria 1 and 2	Critical Incident
Criteria 1, 2 and 3	Major Incident

Identify options and contingencies

When making decisions about actions relating to people who are subject to MSTE, the following should be considered:

Decision making support

- a) Does the decision fit with the agency's strategic aim and objectives?

Northumberland County Council Aim

To provide appropriate support to people who have been identified as having been victims of MSTE within Northumberland

The objectives for Northumberland County Council are to:

- Lead the humanitarian response to offences of MSTE within the county
- Identify appropriate accommodation for victims who do not wish to remain at their current address
- Support Northumbria Police to operate a Victim Reception Centre(VRC) ([Appendix G](#)) if needed

- Provide Environmental Health support to carry out inspections if needed
- Undertake Safeguarding action where needed
- Liaise with partner agencies to deliver appropriate support services

b) Can the decision be enacted with the resources that are currently available?

c) Is the decision legal, morally defensible and justifiable?

Decision making controls

Decision makers should use the following decision controls to ensure that the proposed action is the most appropriate

1. Why are we doing this?
 - a. What goals are linked to this decision
 - b. What is the rationale and is that jointly agreed
 - c. Does it support working together, saving lives and reducing harm

2. What do we think will happen
 - a. What is the likely outcome of the action; in particular what is the impact on the objective and other activities
 - b. How will the incident change as a result of these actions, what outcomes do we expect

3. In light of these considerations, is the benefit proportional to the risk
 - a. Do the benefits of proposed actions justify the risks that would be accepted

4. Do we have a common understanding and position on
 - a. The situation, its likely consequences and potential outcomes
 - b. The available information, critical uncertainties and key assumptions
 - c. Terminology and measures being used by all those involved in the response
 - d. Individual agency working practices related to a joint response
 - e. Conclusions drawn and communications made

5. As an individual
 - a. Is the collective decision in line with my professional judgement and experience
 - b. Have we (as individuals and as a team) reviewed the decision with critical rigour
 - c. Are as (as individuals and as a team) content that this decision is the best practicable solution

Response levels

	About the people who need support	Response initiated by	Leadership will be provided by	Support will be provided by
Business as Usual	<p>1-5 people who have no safeguarding concerns</p> <p>Emergency housing can be provided using existing resources</p>	<p>Health and Social Care Direct (adults)</p> <p>Initial Response Service (children)</p> <p>Emergency Duty Team</p>	Business as usual routes	Existing resources within the Place Directorate?
Critical Incident	<p>6-10 adults who have no safeguarding concerns</p> <p>Emergency housing support can only be provided using external resources</p> <p>(numbers are indicative values only)</p>	<p>Health and Social Care Direct (adults)</p> <p>Initial Response Service (children)</p> <p>Emergency Duty Team</p>	<p>Resilience Team (in hours)</p> <p>Major Incident Coordinator (out of hours)</p>	<p>Directorate continuity groups (in hours)</p> <p>Major Incident Duty Officer (out of hours)</p> <p>Existing resources within People (in hours)</p> <p>Major Incident Team (out of hours)</p>

Major Incident	Numbers exceed the availability of emergency housing support	Health and Social Care Direct (adults)	Major Incident Coordinator (in and out of hours)	Major Incident Team	
		Initial Response Service (children)			Resilience Planning Team
	3+ victims who do not have access to support from the public purse	Emergency Duty Team			Directorate continuity groups (in hours)
	11 + adults who have limited safeguarding concerns	Major Incident Duty Officer			
	5+ adults who have moderate or significant safeguarding concerns	Resilience Team			
	5+ adults who have been trafficked for sexual exploitation				
	5+ adults who have significant safeguarding concerns				
(numbers are indicative values only)					

Briefings

Briefings will be carried out in a way that can be easily understood by those who will carry out the actions or support activities.

To ensure all those involved in an activity covered by this plan, the Information Intention Method Administration Risk Assessment Communication Humanitarian Rights and Other Legal Issues (IIMARCH) principles will be used to develop the messages.

Where possible, briefings should be multi-agency to ensure consistent activities during the response.

	Key questions	Considerations
Information	What, where, when, how? What might? How many?	
Intent	Why are we here? What are we trying to achieve?	Strategic aim and objectives Joint working strategy
Method	How are we going to do it?	Command, control and coordination arrangements Tactical and operational policy and plans Contingency plans
Administration	What is required for effective, efficient and safe implementation?	Identification of commanders Tasking, Timing, Decision logs Equipment, Dress code & PPE Welfare, food and logistics
Risk assessment	What are the relevant risks? What measures are required to mitigate them?	Joint understanding of risk Decision controls
Communications	How are we going to initiate and maintain communications with all partners and interested parties?	Other means of communication Understanding of interagency communications Information assessment Dealing with the Media, develop a joint media strategy and plan

Humanitarian issues	What humanitarian assistance and human rights considerations arise or may arise from this event and the response to it?	Requirement for humanitarian assistance Information sharing and disclosure Potential impacts on individuals' human rights
----------------------------	---	---

Action and Review

As actions within the operation are implemented, the delivering agency will review their impact in real time and make the necessary adjustments to ensure the agreed outcome is delivered.

If the response has triggered the council's Major Incident Plan, the Major Incident Team and the County Operations Room Manager (if sitting) will record the actions, desired and actual outcomes within the Incident Log.

A retrospective review will be undertaken as part of the debrief process.

If partner agencies are concerned about the outcome of any action (or the potential impact of future activities) they should express their concerns immediately through their management chain for consideration and review.

Appendix A - Consider powers, policies and procedures

The response to MSTE is undertaken within the following legislative and policy framework.

Council of Europe Convention on Action against Trafficking in Human Beings

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/236093/8414.pdf

Article 10	Identification of the victims
Article 11	Protection of private life
Article 12	Assistance to victims - UK must provide holistic assistance to victims; includes safe accommodation, subsistence, counsel and information as to legal rights and services in a language they understand, access to vocational training and education
Article 13	Recovery and reflection period “at least 30 days” extended to 45 days in UK
Article 14	Residence Permit on the basis of personal circumstances and/or stay is required for ongoing criminal investigations/proceedings
Article 15	Entitlement to compensation
Article 24	Aggravating circumstances
Article 26	Non prosecution of victims
Article 27	Ex parte and ex officio applications
Article 28	Protection of victims, witnesses and collaborators with the judicial authorities

Directive Preventing and combating trafficking in human beings and protecting its victims

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:101:0001:0011:EN:PDF>

Article 8	Non prosecution of victims
Article 11	Victims provided with assistance including appropriate safe accommodation and material assistance, interpretation regardless of cooperation with criminal proceedings. No time limit is provided for assistance
Article 12	Legal assistance without delay including for the purpose of claiming compensation

Article 14	Assistance and support to child victims
Article 15	Protection of child victims of trafficking
Article 16	Assistance, support and protection for unaccompanied child victims
Article 17	Access to compensation

Human Rights Act 1998

<http://www.legislation.gov.uk/ukpga/1998/42/contents>

Article 2	Right to life
Article 3	Prohibition of torture
Article 4	Prohibition of slavery and forced labour
Article 6	Right to a fair trial
Article 7	No punishment without law
Article 8	Right to respect for private and family life
Article 9	Freedom of thought, conscience and religion
Article 14	Prohibition of discrimination

Modern Slavery Act 2015

<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

Section 1	Slavery, servitude and forced or compulsory labour
Section 2	Human Trafficking
Section 3	Generic Meaning of exploitation
Section 4	Committing an offence with intent to commit a trafficking offence

Safeguarding Vulnerable Groups Act 2006

<http://www.legislation.gov.uk/ukpga/2006/47/contents>

Section 59	Vulnerable Adults
------------	-------------------

Care Act 2014

<http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted/data.htm>

Section 1	Promoting individual well-being
Section 4	Providing information and advice
Section 6	Cooperating generally
Section 9	Assessment of an adult's needs for care and support
Section 18	Duty to meet needs for care and support
Section 42	Enquiry by local authority

Children Act 1989

<http://www.legislation.gov.uk/ukpga/1989/41/contents>

Part V	Protection of Children
Section 46	Removal and accommodation of children by police in cases of emergency

Children Act 2004

<http://www.legislation.gov.uk/ukpga/2004/31/contents>

Part 2	Children's services in England
--------	--------------------------------

Achieving Best Evidence in Criminal Proceedings

http://www.cps.gov.uk/publications/docs/best_evidence_in_criminal_proceedings.pdf

Housing Act 2004

<http://www.legislation.gov.uk/ukpga/2004/34/contents>

Section 95	Offences in relation to licensing of houses under this Part
Section 139	Service of overcrowding notices
Section 239	Powers of entry
Section 240	Warrant to authorise entry
Section 242	Additional notice requirements for protection of owners

Environmental Protection Act 1990

<http://www.legislation.gov.uk/ukpga/1990/43/contents>

Section 79	Statutory nuisances and inspections
Section 80	Summary proceedings for statutory nuisances
Schedule 3	Statutory Nuisances: Supplementary Provisions

National Referral Mechanism

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales>

Convention for the Protection of Human Rights and Fundamental Freedoms

http://www.echr.coe.int/Documents/Convention_ENG.pdf

Article 3	Prohibition of Torture (no-one shall be subjected to torture or to inhumane or degrading treatment or punishment)
Article 4	Prohibition of Slavery and Forced Labour

Ranste v Cyprus (25965/04) (2010) 51 EHRR 1

https://www.coe.int/t/dghl/cooperation/economiccrime/corruption/Projects/CAR_Serbia/ECtHR%20Judgements/English/RANTSEV%20v%20CYPRUS%20%20RUSSIA%20-%20ECHR%20Judgment%20_English_.pdf

Public Authorities have a positive duty to identify, investigate cases and protect victims of trafficking including from re-trafficking (either within the contracting state concerned or on return to another state). Failure can result in a breach of human rights. It is unlawful for public authorities to act in a way which is incompatible with the ECHR (see section 6 Human Rights Act 1996)

Galdikas and Ors R v Secretary of State for the Home Department and Ors EWHC 942

<http://www.bailii.org/ew/cases/EWHC/Admin/2016/942.html>

Facts

4 EEA Nationals, two cooperating with a police investigation, two pursuing compensation claims. They had been previously conclusively identified as victims of trafficking had been through the National Referral Mechanism and were now facing destitution and homelessness following the changes to welfare benefit assistance for EEA Nationals.

Judgement

- Article 11 (2) Trafficking Directive read with other parts of Article 11, the recitals to the Directive, Article 12 ECAT and Article 4 ECHR is a free standing duty to provide support irrespective of criminal proceedings (see para.35 - 44)

- Obligation to provide support as defined in Article 11 (5) of the Trafficking Directive (including accommodation, material assistance etc) in the post 45 day recovery and reflection period pending any determination of discretionary leave to remain or appropriate move on including for historic cases (see para. 116)
- The Trafficking Directive doesn't create an independent right of residence (see paras. 35-44)
- The support regime post NRM through Guidance and practice achieves the aims of Article 11 based on the Home offices evidence of providing extensions in the NRM pending discretionary leave – the judge based his judgement on the evidence provided by the Home Office (see para.69, 104 and 98)
- The Competent Authority Guidance was unlawful in only allowing the police to make discretionary leave applications where the victim was cooperating with a police investigation the victim. Legal representatives should also be allowed to make an application based on these circumstances (see para.116)

R (AK) v Bristol City Council CO/1574/2015

- Claimant was a Lithuanian national who had escaped from a criminal gang where she was forced to work. She had not filed a criminal complaint against the perpetrators.
- She was granted a positive conclusive grounds decision of trafficking. She was an EEA national who hadn't been granted leave to remain and at the time did not satisfy eligibility criteria for housing benefit, housing assistance, Employment Support Allowance (ESA) and JSA.
- The Local Authority decided she wasn't eligible for support including accommodation and/or Subsistence. The victim argued she was entitled to support from the Crisis Fund or under Section (1) (1) Localism Act 2001 as the only means by which she would be able to provide for her basic needs was to engage in prostitution which she didn't want to do.
- The victim brought a judicial review application against the Local Authority arguing that her situation was inhumane and degrading and breached her rights under Article 11 Directive, Article 12 ECAT and Article 3 and 4 ECHR. She was provided with an interim injunction requiring the local authority to provide her with £50.00 a week subsistence and accommodation.

Consented Judgement

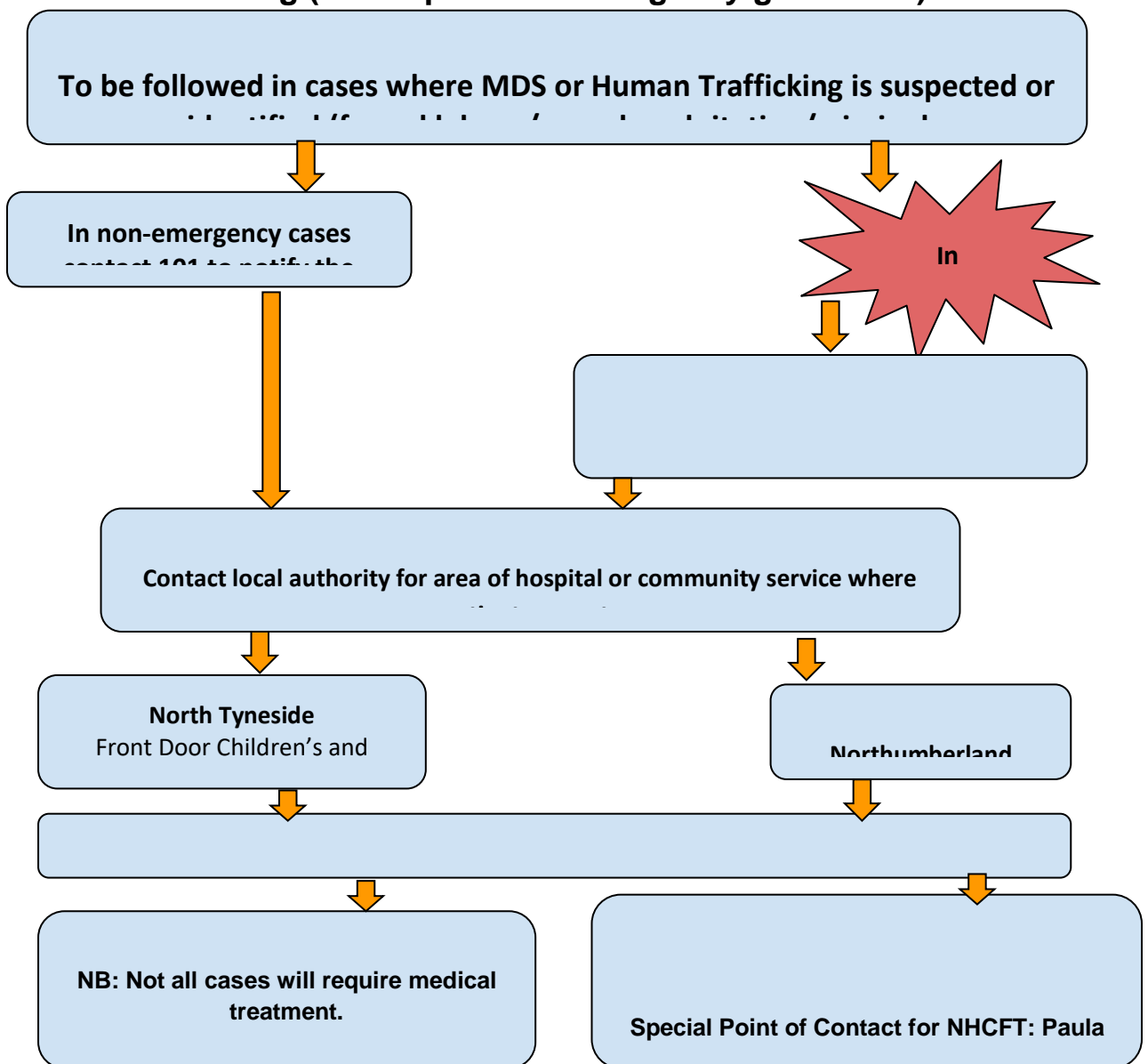
Just before the trial Bristol City Council conceded:

- The council were not prevented by section 2 Localism Act 2011 nor by Schedule 3 Nationality, Immigration and Asylum Act 2002 from providing support to EEA Nationals to the extent that such support is necessary to avoid a breach of Article 3 and 4 European Convention on Human Rights and Article 11 of the Trafficking Directive

- The council agreed to provide ongoing support of accommodation until the victim could find appropriate alternative accommodation and subsistence of £35.00 per week.

Appendix B

NHCFT Flowchart response to Modern Day Slavery (MDS) and Human Trafficking (accompanies multi-agency guidelines)



Appendix C - Joint Decision Making Model

Single and multi-agency decision making will follow this general pattern of the Joint Decision Model.



Appendix D - Joint understanding of risk

Identify hazards	This begins with the initial call to a control room and continues as first responders arrive on scene. Information gathered by individual agencies should be disseminated to all first responders, control rooms and partner agencies effectively.
Carry out a dynamic risk assessment (DRA)	Individual agencies carry out Dynamic Risk Assessments, reflecting the tasks/objectives to be achieved, The hazards identified and the likelihood of harm from those hazards. The results should then be shared with any other agencies involved.
Identify tasks	Each individual agency should identify and consider their specific tasks, according to their role and responsibilities. These tasks should then be assessed in the context of the incident.
Apply risk control measures	Each agency should consider and apply appropriate control measures to ensure any risk is as low as reasonably practicable. The 'ERICPD' mnemonic may help in agreeing a coordinated approach with a hierarchy of risk control measures: Eliminate, Reduce, Isolate, Control, Personal Protective Equipment, Discipline.
Have an integrated multi-agency operational response plan	The outcomes of the hazard assessments and risk assessments should be considered when developing this plan, within the context of the agreed priorities for the incident. If the activity of one agency creates hazards for a partner agency, a solution must be implemented to reduce the risk to as low as reasonably practicable.
Record decisions	The outcomes of the joint assessment of risk should be recorded, together with the jointly agreed priorities and the agreed multi-agency response plan, when resources permit. This may not be possible in the early stages of the incident, but post-incident scrutiny focuses on the earliest decision making.

Appendix E –The National Referral Mechanism

The National Referral Mechanism Is a multi-agency framework designed to make it easier for the agencies involved to cooperate, share information and facilitate victim access to support.

Once an individual is referred to the NRM trained specialists designated as 'competent authorities' within the UK Human Trafficking Centre, will assess their circumstances and make an initial decision on whether there are 'reasonable grounds to believe' that the individual is a victim.

A positive decision will provide the individual with a 45-day recovery and reflection period during which time they can access specialist support and accommodation through the Salvation Army.

The specialist support that the Salvation Army provide is designed to preserve the dignity of victims, protect and care for them in safe accommodation and provide access to confidential client based, tailored support services including

- Safe Accommodation
- Legal Advice
- Health Care
- Counselling
- Education and Training.

At the end of the recovery period and reflection period the competent authority will, in close liaison with Police and other interested parties, then make a second tiered decision which is to conclusively decide if the individual is a victim of trafficking.

There are three possible exits to the NRM

- Assisted voluntary return home.
- A move into independent accommodation.
- Asylum support if required.

There is no requirement for a potential victim to support a law enforcement investigation but the 45-day recovery and reflection period gives them the opportunity to consider whether they wish to. The support is available to all potential victims, regardless of nationality or immigration status.

Appendix F- Key Contacts

Team	Contact Number
Civil Contingencies Team (Duty Civil Contingency Officer)	01670 627 599
Adult Social Care	01670 536 400
Housing Services	0345 600 6400
Children's Services	01670 536 400
Community Safety Team	0345 600 6400
Multi-Agency Partner Organisations	
British Red Cross (24hrs)	0300 023 0700
Hope for Justice (activation via Police)	0300 008 8000
Salvation Army (24hrs)	0300 303 8151

Appendix G

Victim Reception Centre Guide to Operation

Depending upon the severity of the issues and number of victims involved, a Victim Reception Centre (VRC) may need to be implemented with the purpose of:

Purpose

- **Provide** a place of safety for people who have been directly involved in an incident but who do not need immediate acute hospital treatment
- **Facilitate** the provision of immediate humanitarian assistance and first aid
- **Provide** short term accommodation for up to 5 days
- **Enable** the delivery of emotional support
- **Provide** information to victims about what is happening
- **Facilitate** the collection of witness statements for Northumbria Police
- **Direct** victims on to further assistance

Location

The Victim Reception Centre (VRC) will be located in an appropriate building agreed between Northumberland Council and Northumbria Police

Requirements

The VRC must have appropriate space to enable the discharge of the following functions:

1. Reception area to welcome people into the centre and control access
2. Immediate medical assessment
3. Safeguarding assessments
4. Housing assessments
5. Evidence collection
6. VRC Management
7. Food and other refreshments
8. Smoking
9. Relaxation and leisure
10. Sleeping
11. Staff rest

Availability

When open, the VRC requires controlled and secure access 24/7

Security inside the Centre

Security for the VRC is provided by Northumbria Police who will maintain its security in so far as is reasonably practicable by:

- Checking that people who are entering the VRC have a reason to be there
- Preventing unauthorised persons gaining access e.g. press and media

The VRC is a secure environment with access permitted to

- People who normally reside at the target addresses who are thought to be victims of trafficking
- Those with a role in the documentation and welfare of the victims

Staff attending the centre should be in possession of identification

Communication

- Northumbria Police leads on the development and agreement of information given to people **within** the VRC
- Communication with the wider population will be directed by a combined multi-agency Communication Strategy led by Northumbria Police

Transport

- Transport to the centre will be provided by Northumbria Police
- Once people are within the centre, transport is the responsibility of the agency whose function requires someone leaving the VRC

Vulnerable people

People who have been trafficked to work are seen to be Vulnerable under Article 2 of the EU Directive 2011/36/EU

Humanitarian support will be provided by

- Northumberland County Council
- British Red Cross
- Hope for Justice
- NHS England

Victim Reception Centre Management

Northumbria Police are the lead agency within the VRC with support from Northumberland County Council.

Victim Reception Centre Management Group

Under the direction of the VRC, the Management Group will

- **Review** the purpose of the centre as it applies to the incident
- **Identify** any additional agencies who are needed within the centre
- **Undertake** a premises risk assessment and puts appropriate controls in place
- **Support** an appropriate medical triage process
- **Identify** and assesses the needs of the centre users and puts appropriate supports in place

- **Ensure** that people working in the VRC have had training for the role they are undertaking
- **Implement** appropriate information sharing processes
- **Review** the usefulness of the VRC and recommends appropriate expansion and contraction of services
- **Support** the development of a multi-agency VRC Exit Strategy

Victim Reception Centre Roles and Responsibilities

Northumbria Police

- **Assume** responsibility for the effective management of the VRC
- **Chair** the VRC Management Group
- **Provide** appropriate security
- **Undertake** evidence capture
- **Liaise** with the Tactical Coordinating Group
- **Ensure** that regular briefings are made to update people as to what is happening
- **Ensure** that everyone is met on arrival

British Red Cross

- **Provide** immediate health triage
- **Support** emotional wellbeing on centre users

Hope for Justice

- **Greet** new arrivals to the VRC and advises on the procedures that follow where possible
- **Support** victims of trafficking and modern slavery within the VRC
- **Support** evidence capture
- **Inform** the professional practice of agencies

Northumberland County Council

MI Co-ordinator - (off site) Ensures appropriate council resources are mobilised

- **Identify** and activates appropriate voluntary sector and faith agencies

Liaison Officer

- Support the Police within the VRC Management Group
- Liaises with the Major Incident Coordinator and County Operations Room

WCL

- Ensure appropriate safeguarding arrangements are in place for people within the VRC
- Identify appropriate support and/or equipment for people with additional needs
- **Liaise** with the Major Incident Team to deliver social care support

- **Liaise** with hospital based social care workers and the council's Initial Response Service
- **Support** communication between agencies and people within the centre
- **Request** additional social care support as necessary

Housing

- **Liaise** with the Major Incident Coordinator to identify emergency accommodation needs

NHS England

- **Identify** and activate appropriate health resources for the VRC (e.g. nurse practitioners, community nurses, GPs etc)
- **Address** the immediate health needs of survivors at the VRC
- **Provide** support in accessing replacement medication
- **Liaise** with the wider health economy and social care to support survivors as necessary, particularly those deemed to be more vulnerable

Centre rules

To help people stay safe within the Reception Centre the following rules are in place

1. No street drugs are to be used within the centre
2. Smoking is prohibited inside the VRC but an outdoor ashtray is available
3. Consumption of alcohol is permitted in the centre at the discretion of the VRC Manager
4. No visitors are allowed into the centre
5. No pets can be housed in the centre
6. A curfew of 22:00 is in place
7. People using the centre must sign in and out when entering or leaving the site

Safeguarding activities

Alerting

In the event of a no notice action against modern slavery the council will be notified through the:

Adult Social Care team in hours –	01670 536 400
onecall@northumbria-healthcare.nhs.uk.gov.uk	
Children's Service in hours	01670 536 400
Emergency Duty Team out of hours	01670 536 400
childrentriage@northumberland.gov.uk	

Purpose

- **Provide** appropriate support to adults and children who are identified during police responses to modern slavery offences

Role

- **Undertake** safeguarding assessments
- **Identify** appropriate support where needed
- **Sign post** on to business as usual services

Initial Actions

Consider the following questions:

1. How many people require support and what assistance is required?
2. Does the requested support require recipients to be eligible for access to the public purse??
3. If the victim doesn't have recourse to public funds, what support can be provided
4. What time scale are Northumbria Police working to:
 - a. Evidence of trafficking and/or exploitation has been discovered during unrelated police activity and the victim (s) require immediate social care support – **Immediate support is required**
 - b. People have self-presented and require emergency housing and/or social care whilst investigations are on-going – **Urgent support is needed, but people are in a place of safety**
 - c. People have self-presented and their condition requires immediate health interventions and subsequent council support – **Support is needed but people's immediate needs are being met**
 - d. An urgent police strike is expected to take place within the next few hours – **Planned support is needed for potentially large numbers of people about whom little is known**
 - e. A planned police strike is expected to take place within the next few days – **Planned support is needed for potentially large numbers of people about whom some is known**
5. For each service involved in the delivery of the requested actions consider the following questions:
 - a. Can the support be provided with currently deployed resources? If it can't:
 - i. **where** can additional resources be found
 - ii. **who** needs to agree to the reallocation or procurement or additional resource
 - iii. **how** long would it take for the resources to be made available
 - b. What could be the impact on business as usual be if the requested level of support was provided?
 - c. If the impact is **significant**, consider whether existing continuity arrangements provide appropriate resources to maintain agreed service levels
 - d. Identify who can sign off the
 - i. **acceptance** of a time limited reduction of council services in line with agreed continuity or surge plans

- ii. **offer** of reduced support that would not compromise our statutory obligations
 - iii. **refusal** of requested support to Northumbria Police
 - e. Consider contacting the Major Incident Duty Officer to declare a Critical Incident if the support needed cannot be fulfilled by business as usual or a corporate response is required due to the size and nature of the request
6. If the impact is **moderate** discuss the potential for the incident to escalate with Northumbria Police and service managers and consider preparing to provide for increasing or prolonged support

Emergency Housing

Alerting

In the event of a no notice action against modern slavery, the Housing Assessment and Advice team will be notified by

In Hours 01670 624 830

Out of Hours 01670 536 400

Purpose

- **Provide** appropriate support to adults who are identified during police responses to modern slavery offences

Role

- **Undertake** housing needs assessments
- **Identify** appropriate support and emergency accommodation where needed
- **Sign post** on to business as usual services

Initial Actions

- **Consider** the number of people requiring emergency accommodation
- **Consider** the possible nationality of those requiring support
- **Consider** the homelessness duty owed to the presenting individual

People who have been assessed as victims of modern slavery will be deemed as vulnerable and therefore have an automatic priority need.

Only people in genuine and effective work are eligible for the full homelessness duty irrespective of the legal duty owed, the council will seek to support as many individuals as possible who present.

Consider the level of voids within the council's temporary accommodation(TA) supported by the table below. People may have to be placed around the county, depending on the location of vacancies

Voids	Emergency housing	Response level	Action
15+	People to be housed in NCC Temporary Accommodation (TA)	Business as Usual	
10-15	People to be housed in TA	Declare Critical Incident (Continuity) Activate Continuity Arrangements	Inform Duty Manager that delivery of a Critical Function could be affected Inform Directorate team and Major Incident Duty Officer
5- 9	TA business as usual resources to be used if there is reasonable likelihood, as judged by service managers, of sufficient move ons in the immediate term to return to BAU void levels	Declare Critical Incident Activate Continuity Arrangements	Inform Duty Manager that delivery of a Critical Function will be affected Inform Directorate team and Major Incident Duty Officer
4 – 0	TA business as usual resources could not be used as this would make the core service inoperable	Declare Major Incident Activate Continuity Arrangements	Inform Duty Manager that delivery of a Critical Function will be affected Inform Directorate team and Major Incident Duty Officer

Logistics

Alerting

In the event of a no notice action against modern slavery,
Catering can be arranged by contacting
In Hours – (7 days a week, office hours)
Out of Hours, contact Major Incident Duty Officer

Furniture can be arranged by contacting -
Out of Hours, contact Major Incident Duty Officer

Leisure services equipment can be arranged by contacting
In Hours – Out of Hours, contact Major Incident Duty Officer

Purpose

Provide logistic support people who are identified during police responses to modern slavery offences

Role

- **Provide** additional support to people who have been subject to MSTE

Resources

Catering Onsite catering using pre-agreed menus
 Serving equipment

Risk Assessments

Northumberland County Council

Personal risk assessments will be undertaken by staff deployed by Northumberland County Council using the following documentation:

Exit Strategy

The need for the VRC will be reviewed after six hours and at least every two hours after that.

Following closure of the VRC support will be delivered through normal service channels

The exit strategy should include:

- Extent to which the immediate needs have been met
- Extent and level of services required by the centre users
- Levels of service able to be delivered via Business as Usual
- Any areas of concern requiring additional action
- Agreed public messages
- How information collected from incident logs and centre users is to be shared and stored
- Debriefing and reporting timescale

Code of Practice

General Principles

It is incumbent upon responders to be aware of the possible consequences - direct and indirect - of their work with survivors and the bereaved. Wherever possible they should attempt to anticipate, and to guard against, consequences that can be predicted to be harmful.

All responders should be aware that legislation such as the Data Protection Act, the Freedom of Information Act, Human Rights Act, copyright and libel law may affect the rights of survivors and the bereaved and thus should positively influence their conduct, inquiries, and data dissemination, relations with the media and storage and publication of information.

Responders should strike a balance between enabling access and preventing intrusion in working with survivors and the bereaved. This is particularly relevant when considering issues such as information sharing and seeking and obtaining consent.

Confidentiality

Personal information

All personal information about people using the VRC must be treated as confidential and used only for the purposes for which it was given, unless essential to their welfare and/or an investigation. In some cases, it may be necessary for a responder to decide whether it is proper or appropriate even to record certain kinds of sensitive information.

Personal or identifying data should be rendered anonymous before information is given for the purposes of research, teaching, audits or administration. Responders should respect the anonymity of centre users all times.

Sharing information within a team

In sharing information with other team members about the identity, welfare, status and decisions affecting individuals, responders should respect confidentiality as far as possible. Individuals should be made aware that information about them may be shared within the team unless they object.

Disclosing information to third parties

Sensitive information regarding the personal circumstances of individuals should not be divulged to third parties unless essential to their welfare and/or an investigation, or unless consent has been obtained. This is particularly pertinent in multi-agency responses, meetings and discussions (formal and informal).

Disclosure of information to other centre users should be made only when specific consent to do so has been obtained.

Disclosing information to an individual's family or friends

The wishes of centre users should be established and followed regarding the sharing of any information with their family or others known to them.

Legal Privilege

Information given in confidence does not enjoy legal privilege; that is, it may be liable to subpoena by a court and centre users should be informed of this.

Unintentional disclosures

Responders should avoid making unintentional disclosures by not discussing individuals' details where they can be overheard. Written records should not be left where they can be seen by third parties.

Consent

Consent must be obtained from survivors and the bereaved where it is considered desirable to disclose information to third parties. Such disclosure may be desirable in particular where survivors or bereaved could benefit from contacting each other. In this case, only basic information should be disclosed.

Responding agencies may also wish to ensure that they have consent for basic information to be disclosed to other agencies providing potentially appropriate services. Consent should be sought specifically for the purpose for which it is required and the implications of giving consent explained fully.

In some situations, access to individuals is gained via a 'gatekeeper' or 'intermediary'. In these situations, responders should adhere to the principle of obtaining informed consent directly from those to whom access is required, while at the same time taking account of the gatekeeper's interests.

Special care should be taken as centre users are seen as vulnerable and responders will need to take into account the legal and ethical complexities involved in those circumstances where there are particular difficulties in eliciting fully informed consent. Specialist advice and expertise should be sought where relevant.

Anonymity

Responders should not, unless it is necessary to their welfare and/or an investigation, permit communication of personal or identifying details of individuals to audiences other than those to which centre users have agreed.

Personal or identifying data should be rendered anonymous before information is given for the purposes of research, teaching, audits or administration. Responders should respect the anonymity of centre users at all times.

Data Protection

Appropriate measures should be taken to store data on centre users in a secure manner. Responders should have regard to their obligations under the Data Protection Acts. They should also take care to prevent data being published or released in a form which would permit the actual or potential identification of individuals without their prior written consent.

Guarantees of confidentiality and anonymity given to centre users must be honoured, unless there are clear and overriding reasons to do otherwise, for example in relation to the abuse of children. Other people, such as colleagues, researchers or others who are given access to data must also be made aware of their obligations in this respect

Victim Reception Centre journey

1. Meet and Greet

Hope for Justice or British Red Cross

When people are brought into the reception it is important that they are made to feel welcome, safe and are reassured that they are not in trouble or in danger. The purpose of the meet and greet is to offer that reassurance and support and should include a tour of the centre highlighting the support services on offer, shower facilities and leisure space

2. Health Check and Triage

British Red Cross

The welfare of those using the centre is an absolute priority. Following the meet and greet the victim will be taken to the health area, where any immediate health needs will be assessed and managed by the British Red Cross.

Access to support for serious health conditions will be facilitated by NHS England and British Red Cross.

3. Adult Safeguarding Assessment

Northumberland County Council

To ensure appropriate support is put in place for victims of Modern Slavery, NCC will undertake Safeguarding and social

care assessments where needed.
<https://www.northumberland.gov.uk/Care/Support/Safeguarding.aspx#northumberlandandnorthtynesidesab>

4. Evidential capture

Northumbria Police

Specialist victim interview teams will capture evidence where people wish to cooperate with the investigation. Specialist officers, assisted where necessary with evidential interpreters, will discuss with the victim the procedure and process with regard to providing an account and make the assessment on the most appropriate way to capture the victim’s evidence

5. Housing Assessment

Homelessness and Housing Options Team

Should an individual be unable or unwilling to return to their previous address, the HOT will undertake a housing needs assessment and provide support to access appropriate accommodation

6. National Referral Mechanism

Salvation Army

People who consent to being referred into the NRM will be referred to the Salvation Army for relocation and support ([Appendix E](#))

Victim Reception Centre Staffing

Shift	Role	Name (s)	Agency	Contact no
	VRC Manager		NorPol	
	Adult Safeguarding		NCC	
	Housing Advice		NCC	

	Medical Support		BRC	
	Welfare Support		BRC	
	Victim Support		HfJ	
	Interpreter		NorPol	
	Interview team 1		NorPol	
	VRC Security		NorPol	
	NCC Liaison		NCC	
	Facilities Management		NCC	

Glossary

Term	Additional information
Assistance Centre	Any facility (whether physical or virtual) set up during response to and recovery from an emergency to provide a range of assistance to different categories of people affected by the emergency
Casualty	<ol style="list-style-type: none"> 1. Person killed or physically, psychologically or mentally injured as a result of war, accident or civil emergency 2. (For Casualty Bureau purposes) Person known, or believed, to be involved in an incident, including evacuees, survivors, and deceased
Catastrophic emergency	An emergency which has an exceptionally high and potentially widespread impact and requires immediate central government direction and support.

Command and Control	The exercise of vested authority through means of communications and the management of available assets and capabilities, in order to achieve defined objectives.
Community Impact Assessment	Procedure to identify the impact a police operation or response may have on communities, including actions necessary to overcome potential negative effects either before or after the deployment of resources, and to specify primacy for community engagement with respect to each element of the operation or response
Competences	Competences include the knowledge, judgement, skills, energy, experience and motivation required to respond adequately to the demands of one's professional responsibilities.
Consequence management	Measures taken to protect public health and safety, restore essential services, and provide emergency relief to governments, businesses, and individuals affected by the impacts of an emergency
Coordination	The integration of multi-agency efforts and available capabilities, which may be interdependent, in order to achieve defined objectives.
Crisis	<ol style="list-style-type: none"> 1. General definition: an inherently abnormal, unstable and complex situation that represents a threat to the strategic objectives, reputation or existence of an organisation. 2. Specific definition - emergency of magnitude and/or severity requiring the activation of central government response 3. Personal - acute emotional reaction to a powerful stimulus or demand
Crisis intervention	Temporary support for individuals or groups who are experiencing an acute state of emotional distress, intended to limit the exacerbation of post trauma symptoms, facilitate recovery and identify those who need more assistance

Crisis management	<p>1. General definition - strategically-directed activities to prevent, respond to, mitigate the effects of and recover from a crisis.</p> <p>2. In Central Government Arrangements for Responding to Emergencies: Concept of Operations crisis management is the implementation of measures that attempt to prevent or avert an imminent emergency, along with work that puts in place protective or other measures to mitigate the effects of an emergency, prevent further damage or disruption and secure the scene</p>
Director of Public Health	A senior Public Health official who provides strategic leadership for health protection, improvement and joint working with social services
Disaster	Emergency (usually but not exclusively of natural causes) causing, or threatening to cause, widespread and serious disruption to community life through death, injury, and/or damage to property and/or the environment
Emergency	An event or situation which threatens serious damage to human welfare in a place in the UK, the environment of a place in the UK, or the security of the UK or of a place in the UK.
Emergency Plan	A document or collection of documents that sets out the overall framework for the initiation, management, coordination and control of personnel and assets to reduce, control or mitigate the effects of an emergency.
Evacuation	Removal, from a place of actual or potential danger to a place of relative safety, of people and (where appropriate) other living creatures
Evacuation Assembly Point	Building or area on the periphery of an area affected by an emergency, to which evacuees are directed to await transfer to a survivor reception centre or rest centre

Extendibility	A characteristic of plans that may have been developed for specific circumstances but are able to be applied, or 'scaled up' to larger, or otherwise different circumstances.
Family Liaison Coordinator	Police officer responsible for directing and supporting the Family Liaison Officers and acting as a liaison point for other agencies that may be able to assist with the family needs
Family Liaison Officer	Police officer designated to facilitate an investigation into people believed to be missing and to assist identification by collecting ante-mortem data
Harm	Nature and extent of physical injury (including loss of life) or psychological or economic damage to an individual, community, or organisation
Humanitarian assistance	Multi-agency response to ensure that those involved and affected by a major incident are properly cared for, by the provision of shelter, information, advice, emotional, financial and legal support, and the like
Incident	Event or situation that requires a response from the emergency services or other responders
Non-hospitalised injured survivor	Person injured as a result of an emergency or disaster whose injuries are not serious enough to require hospitalisation
Preparedness	Process of preparing to deal with known risks and unforeseen events or situations that have the potential to result in an emergency
Primary and community care services	Medical and other health services, provided by the health professions and local authority social services departments, particularly during the response phase of an emergency, but also in the longer term recovery phase if on-going monitoring and treatment are required
Psycho-social intervention	Activity aimed at preventing or reducing Post-Traumatic Stress Disorder in individuals involved in or affected by an incident

Psycho-social needs	Practical, emotional, social and psychological needs of individuals affected by an incident
Psycho-Social Support	Activity aimed at strengthening the coping strategies of individuals or communities involved in or affected by an incident
Public Awareness	A level of knowledge within the community about risks and preparedness for emergencies, including actions the public authorities will take and actions the public should take.
Public Information Line	Helpline set up during and in the aftermath of an emergency to deal with information requests from the public
Public Information Point	Location providing access to information for members of the public during an emergency
Rapid onset emergency	Emergency which develops quickly, and usually with immediate effects, thereby limiting the time available to consider response options (in contrast to rising tide emergency)
Readiness Level	An assessment of the extent to which a capability meets the agreed capability target.
Recovery	Process of rebuilding, restoring and rehabilitating the community following an emergency or disaster, continuing until the disruption has been rectified, demands on services have been returned to normal levels, and the needs of those affected have been met
Recovery Advisory Group	Provides advice on recovery considerations arising from a nuclear emergency to the Strategic Co-ordinating Group during the response/acute phase.
Recovery Co-ordinating Group	Strategic decision making body for the recovery phase once handover has taken place from the police
Recovery phase	Phase focussed on recovery, commencing at the earliest opportunity following the onset of an emergency, and running in tandem with the response phase

Rescue	Removal, from a place of danger to a place of relative safety, of persons threatened or directly affected by an incident, emergency, or disaster
Resilience	Ability of the community, services, area or infrastructure to detect, prevent, and, if necessary to withstand, handle and recover from disruptive challenges
Response Co-ordinating Group	A Multi-SCG Co-ordinating Group which may be convened where the local response has been, or may be, overwhelmed and wider support is required, or where an emergency affects a number of neighbouring Strategic Coordinating Groups and would benefit from co-ordination (e.g. to obtain a consistent, structured approach) or enhanced support.
Rest Centre	Building, which could include overnight facilities, designated by the local authority for the temporary accommodation of evacuees
Risk assessment	A structured and auditable process of identifying potentially significant events, assessing their likelihood and impacts, and then combining these to provide an overall assessment of risk, as a basis for further decisions and action.
Risk priority	The relative importance of the treatment(s) required for the management of the risk, based on the risk rating and the additional capabilities required to manage risk.
Senior Investigating Officer	Detective officer appointed to assume responsibility for all aspects of a police investigation
Sensitive information	Information which, if disclosed to the public would, or would be likely to (a) adversely affect national security, (b) adversely affect public safety, (c) prejudice the commercial interests of any person; or is information that is personal data, within the meaning of section 1(1) of the Data Protection Act 1998, the disclosure of which would breach that Act.

Situation Report	Report produced by an officer or body, outlining the current state and potential development of an incident and the response to it
Statutory guidance	Advice provided by or to an authority under statutory powers concerning the implementation of or compliance with a specific law
Support Groups	Mutual assistance grouping of people affected by an emergency
Survivor	Any person, whether injured or not, who is not killed in an incident or emergency
Survivor Reception Centre	Casualty bureau form used to record information about uninjured survivors and evacuees
Vulnerable Person	A person who is less able to help themselves in the circumstances of an emergency
Vulnerability	Susceptibility of individuals or community, services or infrastructure to damage or harm arising from an emergency or other incident
Vulnerable Establishment	Institution housing vulnerable people during the day or at night
Well-being power	(Local authority guidance term for) Power held by a local authority under the Local Government Act 2000 which underpins mutual aid

Housing Act 2004 s 242

The Housing Act 2004 places a prerequisite for enforcement action of serving a notice before entry, which gives the owner of the property and the occupants at least 24 hours' notice before a visit takes place. If this is not served, any subsequent action is fatally flawed.

The only exception to this is if we are invited by the tenant into the property and a matter of evident concern is noted which is likely to result in serious personal injury e.g. live electrical cable being exposed at floor height in a child's bedroom, then there grounds to take emergency remedial action to remove the risk (e.g. repair) and then bill the owner for this.

However as we are not being invited into the properties this option will also be missing.

What we would do is visit the property and ascertain certain information such as the number of occupants, their sex, age and relationship to one another and the general condition of the property. If there are matters of concern this could then be followed up after serving the required notice of intended entry.

This would allow for a formal assessment and classification of hazards identified. If the occupants are not related and there are more than 2 households living in the property it would be deemed as a House (HMO) in multiple occupation. If disrepair is identified in a HMO (does not need to be a HMO subject to licencing, which is a property of 3 or more levels occupied by 5 or more households) The Management of Houses in Multiple Occupation (England) Regulations 2006 creates an offence for failing to maintain living accommodation or common parts, and usual regulatory approach would be taken. In summary if we identify cause for concern we would have to revisit under notice of intended entry to follow up with formal action, if it is appropriate.

The EU rights of victims of trafficking in human beings

(http://ec.europa.eu/dgs/home-affairs/e-library/docs/thb_victims_rights/thb_victims_rights_en.pdf)

'Trafficking in human beings' as defined in Directive 2011/36/EU, Article 2:

1. The recruitment, transportation, transfer, harbouring or reception of persons, including the exchange or transfer of control over those persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.
2. A position of vulnerability means a situation in which the person concerned has no real or acceptable alternative but to submit to the abuse involved.
3. Exploitation shall include, as a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services,

including begging, slavery or practices similar to slavery, servitude, or the exploitation of criminal activities, or the removal of organs.

4. The consent of a victim of trafficking in human beings to the exploitation, whether intended or actual, shall be irrelevant where any of the means set forth in paragraph 1 has been used.
5. When the conduct referred to in paragraph 1 involves a child, it shall be a punishable offence of trafficking in human beings even if none of the means set forth in paragraph 1 has been used.

Assistance and support

1. Victims are entitled to assistance and support as soon as the competent authorities have reasonable grounds to believe that they might have been trafficked.
2. Victims are entitled to assistance and support before, during, and for an appropriate time after the conclusion of criminal proceedings.
3. Assistance and support should not be conditional on the victim's willingness to cooperate in the criminal investigation, prosecution or trial; in cases where the victim does not reside lawfully in the Member State concerned, assistance and support should be provided unconditionally at least during the reflection period.
4. Assistance and support can only be provided with the victim's consent on an informed basis.
5. Victims are entitled to at least a subsistence-level standard of living, appropriate and safe accommodation and material assistance.
6. Victims are entitled to necessary medical treatment including psychological assistance, counselling and information.
7. Victims are entitled to translation and interpretation services where appropriate.
8. Victims with special needs (in particular needs in relation to pregnancy, health, disability, physical or mental illness or have suffered serious physical, sexual or psychological violence) shall be attended to.
9. Victims, in accordance with their needs, have the right to access confidential victim support services, free of charge, acting in the interests of the victims before, during and for an appropriate time after criminal proceedings. Family members are entitled to access to victim support services in accordance with their needs and the degree of harm suffered as a result of the criminal offence committed against the victim.
10. Specialist support services must provide: (a) shelters or any other appropriate interim accommodation for victims in need of a safe place due to an imminent risk of secondary and repeat victimisation, of intimidation and of retaliation; (b) targeted and integrated support for victims with specific needs, including victims of sexual violence and victims of gender-based violence, including trauma support and counselling.

11. Victims who are third-country nationals must be informed of the reflection and recovery period and provided with information on the possibilities of obtaining international protection.
12. Victims have the right to seek asylum, and be informed of the possibilities for obtaining international protection and should be protected against refoulement (return to the country where there is a risk of death, torture or other inhuman or degrading treatment or punishment).

Protection of victims of trafficking in human beings

1. Victims have the right to appropriate protection based on an individual risk assessment. The individual assessment should be timely and should aim to identify specific protection needs and to determine whether and to what extent they would benefit from special measures in the course of criminal proceedings due to the particular vulnerability to secondary and repeat victimisation, intimidation and retaliation.
2. Victims of trafficking should not be prosecuted or be subject to penalties imposed for their involvement in criminal activities which they have been compelled to commit as a direct result of being subjected to trafficking in human beings, in accordance with national law.
3. Victim personal data can be collected from victims only for specified, explicit and legitimate purposes and in the framework of the tasks of the competent authority and may be processed only for the same purpose for which the data was collected. Processing of this data has to be lawful, adequate, relevant and not excessive (in relation to the purpose for which it was collected).
4. Victim personal data must be deleted or made anonymous when it is no longer required for the purpose for which it was collected.
5. Victims are entitled to information from their first contact with the competent authorities (such as the police, judicial authorities, etc.) and as far as possible in languages commonly understood.

Victims are entitled to information on:

- the type of services or organisations to which they can turn for support;
- the type of support which they can obtain;
- where and how they can report an offence;
- procedures following such a report and their role in connection with such procedures;
- how and under what conditions they can obtain protection;
- to what extent and on what terms they have access to legal advice, legal aid or any other sort of advice;
- requirements for them to be entitled to compensation;
- if they are resident in another Member State, any special arrangements available to them in order to protect their interests;

- how to receive reimbursement for expenses incurred as a result of their participation in criminal proceedings.