

DEVELOPING A COUNTER-TRAFFICKING STRATEGY

There are many areas that can be considered when adopting a counter-trafficking strategy to ensure a comprehensive approach to tackling human trafficking within sectors and organisations. A few key areas to consider for a robust counter-trafficking strategy are training, awareness and policies/procedures. Guidance and best practices to consider in the development and implementation of these key areas to support prevention and safeguarding efforts are outlined below. While the following sets forth best practices, understanding that each organisation varies in resources and size, an organisation may choose to focus on the development of one area as a starting point.

Training

As human trafficking is a fast-growing crime, individuals in the best possible position to identify human trafficking due to the nature of their employment ('frontline professionals') should be regularly trained on human trafficking trends and practices. Frontline professionals can include employees in forward-facing government entities such as the border police, law enforcement and immigration enforcement. It can also include non-governmental enterprises within the transportation and hospitality sectors such as taxis or rideshare, service stations, airline, rail, hotels and motels. The education and healthcare sectors could also be considered as 'frontline professionals' due to the proximal nature of their work.

These training sessions should include general human trafficking information, as well as being tailored to the needs of the audience in addressing issues specific to that sector, changing trafficking trends and behaviours. While all levels within the organisation should be trained, training for those working on the 'frontline' and most likely to encounter potential victims of trafficking should be prioritised. Training sessions should be regular to ensure awareness of the latest trends and information. Even if new information is not necessarily provided in each training, refresher training can be vital in strengthening understanding of the topic, providing reminders of key learning points and providing a forum for further discussion by employees.

A21 provides specialist professional training sessions to a variety of sectors including law enforcement, aviation, healthcare, hospitality and business. The training covers a variety of topics and seeks to provide a full overview of the issue of human trafficking; from breaking down the core elements of the crime to specific industry strategies and practices to combat the crime. Contact info.uk@a21.org for more information or to book a professional training session.

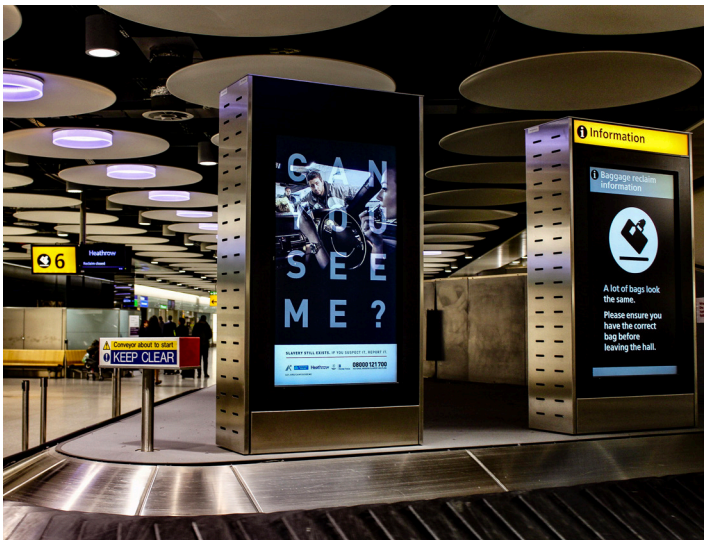
Awareness

IMPORTANCE OF AWARENESS

Awareness is always the first step in understanding and combatting human trafficking. A foundational understanding of the issue, including recognising human trafficking, the different types of trafficking, vulnerability factors and dispelling myths, is key to action the correct response. Awareness as a general practice gives visibility to the issue of human trafficking to the public at large and within certain sectors. By remedying misconceptions about human trafficking and correcting potential stereotypes about both victims and perpetrators, individuals become better equipped to recognise potential trafficking situations. While there are different methods, strategies and tools used to raise awareness, one of the most effective ways is through widely disseminated, targeted public awareness campaigns.

PUBLIC AWARENESS CAMPAIGNS

Awareness campaigns increase the general knowledge of human trafficking from specific sector perspectives (i.e. highlighting indicators of trafficking in an airport environment, hotel or even a health care system). Public awareness campaigns can both educate the general public to stimulate self-mobilisation and action, as well as provide potential victims with information to facilitate self-identification when linked to reporting mechanisms like hotlines. Ultimately, a well-thought-out public awareness campaign will equip the general public to recognise a possible trafficking situation and the steps needed to report it. Similarly, a victim-centred public awareness campaign can provide avenues by which a victim may be able to self-identify and seek available assistance. Ideally, a public awareness campaign should be multipurpose to appeal to the vulnerable population, victims being actively trafficked and the general public. Awareness campaigns directed to the public to increase reporting coupled with frontline professionals trained to utilise public awareness campaigns in their specific profession can work powerfully together to combat human trafficking in that sector. The foundational principle of public awareness campaigns is that an increase in reports will lead to an increase in victims identified. A21's *Can You See Me?* Campaign illustrates the use of a public awareness campaign to highlight common human trafficking scenarios, present the key signs and recruitment methods and provide information on reporting mechanisms.



Policies/Procedures

All sectors should have robust policies in place that outline clear processes to follow when encountering a potential victim of trafficking. These procedures should include internal procedures to follow when engaging with a potential trafficking situation, staff conduct when encountering a potential victim and implementing a victim-centred approach. Protocols should also include an easy to follow referral process that is well understood by staff across all levels.

For example, such a policy with a clear process can include:

- ▶ Creation of a step-by-step guidance when human trafficking is suspected
- ▶ A clear flow chart of the relevant referral pathways
- ▶ Listing of one central point of contact to receive reports of suspected trafficking
- ▶ Dissemination and/or training of these policies and procedures

Such protocols ensure the application of a victim-centred approach, resulting in a smooth process that is non-threatening, limits re-traumatisation and provides safety for the victim. Depending on the size and structure of the organisation, a group of individuals within the organisation can be selected to receive more in-depth specialised training, and then designated to assist in suspected trafficking situations.

The policies should comply with section 54 of the Modern Slavery Act (2015) which mandates that commercial organisations which conduct any part of their business in the UK through goods or services and incur an annual turnover of £36 million pounds, should consider if they meet the criteria which requires them to publish a modern slavery statement on their website. The modern slavery statements should cover six primary areas which are outlined in the statutory guidance including but not limited to training and risk assessments to mitigate modern slavery in the business or its supply chains. Organisations are also compelled where possible to make their modern slavery policies accessible to the public on their websites. For more guidance on business compliance requirements and the Modern Slavery Act, see [gov.uk](https://www.gov.uk).

EXAMPLES OF KEY VICTIM-CENTRED PRACTICES:

- ▶ Before speaking with a potential victim, separate the potential victim from the accompanying person.
- ▶ Enlist a trusted translator/ interpreter who also understands the cultural context.
- ▶ Enlist an employee of the same gender as the potential victim when possible.
- ▶ Do not raise your trafficking concerns with the person accompanying the victim.
- ▶ Do not begin the conversation with anything to do with documentation, legal status or violations of any laws as this could potentially scare the victim - simply communicate you are there to help.

Depending on the mandate of the organisation (i.e. law enforcement), it may be possible to conduct regular specialised victim identification safeguarding 'operations' or community outreaches, to focus specifically on human trafficking and safeguarding victims. The purpose of these activities should be to proactively identify potential victims of human trafficking, conduct safeguarding interviews/screenings and provide further support

Post-identification Procedures

In addition to standard policies or procedures laid out above, your organisation should establish a clear process setting forth next steps once a victim has been identified, to include specific actions to ensure the proper safeguarding and support of that victim. For example, consider clear guidance for first responder organisations¹ regarding available support for victims of human trafficking under the National Referral Mechanism (NRM). The guidance could include the referral process for victims who wish to enter the NRM, or alternatively how to complete the 'duty to notify' process (mandatory for law enforcement) for those who decline support. Post-identification policies should lay out specific steps and provide key internal and external contacts for after a victim has been

SUGGESTED COMPONENTS OF A POST-IDENTIFICATION POLICY

- ▶ A summary of relevant information to record as part of the screening interview to support the investigative process
- ▶ A list of relevant, local service providers that can be referred to for support
- ▶ A directory of phone numbers and contact details of key contacts, including internal and external entities
- ▶ Code of conduct which provides guidance on engaging with a victim
- ▶ Reporting and referral pathways including information about the National Referral Mechanism process

All safeguarding procedures should include a provision requiring escalation of any victim safety concerns to the relevant safeguarding lead or line manager. Any concerns should be kept confidential, and information should only be shared on a need-to-know basis

¹A 'first responder organisation' is, in England and Wales, an authority that is authorised to refer a potential victim of modern slavery into the National Referral Mechanism. First responder organisations include police forces, Border Force, local authorities and health and social trusts amongst others.

Potential Contacts to include in a post-identification policy

USEFUL CONTACTS

- ▶ Advisory, Conciliation and Arbitration Service (ACAS) offers free legal advice about UK work status and UK employment rights. Call 0300 123 1100 for assistance (personal details not required).
- ▶ To report poor working conditions or labour exploitation, contact Gangmasters and Labour Abuse Authority (GLAAA) on 0800 432 0804.
- ▶ The NRM is the UK framework created to identify victims of modern slavery in order ensure they receive the appropriate support. To learn more about the NRM process, visit gov.uk or contact a first responder organisation, such as the police, for them to make a referral to the NRM. Please note, an adult must provide consent to be referred to the NRM for support.
- ▶ A21 seeks to equip frontline professionals with the tools to identify, engage and communicate with victims in a victim-centred manner. If you would like advice regarding a potential trafficking case, assistance on an upcoming operation, or repatriation support for a potential victim of trafficking, contact 020 7736 6994 or email info.uk@a21.org.

EMERGENCY HELP

- ▶ If emergency assistance is needed, please call the Police on 999.
- ▶ For medical advice call National Health Services on 111.
- ▶ To report a crime anonymously contact CrimeStoppers on 0800 555 111 (calls are non-traceable).
- ▶ To report a potential case of human trafficking, contact the Modern Slavery Helpline at 08000 700 121 or visit modernslaveryhelpline.org. The Modern Slavery Helpline is a confidential 24/7 service with interpreter services that can provide information, referrals for accommodation, legal assistance and general support.

See Resource [Recognising Human Trafficking](#) for information on recognising a possible trafficking situation; see also Resource [Safeguarding Card](#) for details on reporting mechanisms and signposting for referrals and assistance.

More information on considerations when communicating or engaging with a potential victim of trafficking can be found in Resource [Victim-Centred Approach](#).

See Resource Overview of Can You See Me? Awareness Campaign to learn more about the campaign guidance on how to implement it in order to spread awareness and support intervention efforts.