

DMPC Decision – PCD 771**Title: Funding approval from the Modern Slavery Transformation Unit to the MPS****Executive Summary:**

The Modern Slavery Transformation Unit is funded by the Police Transformation Fund. This is managed through Devon and Cornwall as the lead force, since Chief Constable Shaun Sawyer is the National Police Chiefs Council Lead for Modern Slavery.

The MPS has received funding from the Modern Slavery Transformation Programme since 2017 to employ a dedicated regional analyst. The previous approval in November 2017 (PCD 294) covered funding received in 2017/18 and 2018/19, but this ran out at the end of 2018/19. The regional analyst post continued and was again funded in 2019/20 but no decision was forwarded to MOPAC in relation to this.

For 2020/21 this role ceases and instead funding is being given to the MPS for a regional coordinator role.

This paper requests that the funding received last year is noted and approval is given in 2020/21 for the funding for the regional coordinator role. These posts are fully funded and do not lead to any additional cost for the MPS. This funding is underpinned by a s22 collaboration agreement, which was signed off in February. This agreement specified that it ceased at the end of 2019/20 unless agreed to be extended by the Strategic Oversight Board. This approval has been given so the s22 agreement continues to operate.

Recommendation:

The Deputy Mayor for Policing and Crime is recommended to:

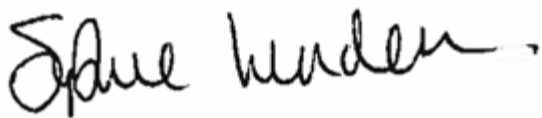
1. Approve funding of £98,609 in 2020/21 from the Modern Slavery Transformation Programme for the London Regional Coordinator.
2. Note funding of £54,631.04 received from the Modern Slavery Transformation Programme in 2019/20 for the London Regional Analyst position.

Deputy Mayor for Policing and Crime

I confirm I have considered whether or not I have any personal or prejudicial interest in this matter and take the proposed decision in compliance with the Code of Conduct. Any such interests are recorded below.

The above request has my approval.

Signature

A handwritten signature in black ink, appearing to read "Spue Warden", is written over a light gray rectangular background.

Date

16/06/2020

PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE DMPC

1. Introduction and background

- 1.1. Year on year offences of Modern Slavery (MS) have seen a significant increase nationally with a 52% increase in 2019. The MPS undertake about a third of the national volume of MS investigations and are the lead investigative body in proactive MS investigations in terms of volume.
- 1.2. In September 2016 Devon and Cornwall, successfully bid to the Home Office for funding through the Police Transformation Fund to ensure that police and partners reduce the vulnerability, threat and risk surrounding MS criminal activity, establishing nationally coordinated action, assessment, guidance and training. This initiative has been highly successful and has achieved its aims of creating a more coordinated approach to the problem of MS.
- 1.3. It is vital that London continues to be well connected with the regions nationally.
- 1.4. The MPS specialist response to MS is the Vulnerability Investigation Team (VIT). This is the dedicated resource which was created through the transformation of the MPS response to organised crime in 2019, replacing the previous Modern Slavery Kidnap Unit (MSKU) with the VIT. The VIT have wider responsibilities relating to the triage, assessment and investigation of serious exploitation cases and offer support and guidance to local policing.
- 1.5. The MPS have obtained funding from the Modern Slavery Transformation Unit (MSTU) since 2017/18 for the purpose of a dedicated Regional Analyst only. This has provided much greater insight into the nature of the problem within London. This has been helpful because of the overall London volume which is a third of the national total. London trends are often indicative of the national picture, albeit criminal exploitation is where the greatest number of victims are exported across the UK from London.
- 1.6. The London Regional analyst role was filled in the MPS between 2017 and April 2020. The MPS regional analyst worked successfully within SCO36 – Met Intel, delivering on MSTU tasking and supporting the MPS. The full costs for the last financial year (2019/2020) were £54,631.04.
- 1.7. The MSTU have decided, in consultation with the National crime Agency, that the analytical function delivered by the regional analysts will cease at the end of 2019/20 and be delivered as part of the function of a National Tasking Centre under the control of the NCA.
- 1.8. Future MS analytical requirements relating to modern slavery will now be completed by Met Intel, they will still have access to support from the MSTU and the NCA through a new National Coordination centre which is due to start during the first quarter of 2020/21 (delayed owing to COVID 19). A raft of digital solutions are also being considered which if approved may assist the MPS response to the issue.

- 1.9. The MPS now seek to employ a London Regional coordinator which will be of great benefit to the MPS in delivering better outcomes on modern slavery investigations. The coordinator isn't a replacement for the analyst, these are two quite different roles.
- 1.10. The Regional Coordinator function will provide tactical advice and guidance across the MPS, City of London Police and British Transport Police. In addition they will support the collation of data requests and intelligence requirements on behalf of the National Police Transformation Team. This post will be directly funded by Devon & Cornwall but will work within the MPS.
- 1.11. Matters relating to selection / recruitment will be decided by the MPS. The post will be filled by a Detective Inspector.
- 1.12. Commander Sue Williams MPS Safeguarding Lead Responsible Officer for MPS has been consulted and is supportive of this proposal. She has appointed Detective Superintendent Tara McGovern as the Senior Responsible Owner (SRO) for Exploitation. She will have oversight of the coordinator role and will delegate daily management of this role holder to DCI Richard McDonagh.
- 1.13. Therefore the request seeks to ratify the transfer of Modern Slavery Police Transformation Fund money secured by Devon and Cornwall to fund the Regional Analyst for 2019/20 by way of the new section 22 agreement and to agree funding approval for the Regional Coordinator role for 2020/21.
- 1.14. The terms of the Sec 22 Collaboration agreement for 2019/20 continue following approval from the Strategic Oversight Board under an Association of Police And Crime Chief Executives (APACCE) Agreement.
- 1.15. The Modern Slavery Transformation Programme and the MPS Directorate Legal Service team have been consulted and approve that this APACCE agreement is effective.

2. Issues for consideration

- 2.1. The first collaboration agreement with Devon and Cornwall was approved in decision PCD 294 in November 2017 for the financial years 2017/18 and 2018/19 along with funding for a dedicated analyst and triage centre over two years.

3. Financial Comments

- 3.1. The Modern Slavery Police Transformation programme is funded by the Police Transformation Fund grant. Under the terms of this grant the MPS is reimbursed for actual staff costs and there are no financial pressures for the MPS.
- 3.2. The original approval from the Modern Slavery Police Transformation Fund, agreed a grant of £264,112 (£86,385 2017/18 and £177,727 2018/19). This approval has expired.

- 3.3. Further funding has been made available for 2019/20 and 2020/21 since the original approval .
- 3.4. This report covers the funding received for the analyst in 2019/20 at a cost of £54,631.04 and the funding planned for a regional coordinator for 2020/21 at an estimated cost of £98,609.
- 3.5. Costs of the analyst post are based on the real cost incurred.
- 3.6. The funding for the coordinator is based on the comparable cost of someone employed in a similar role within specialist crime .
- 3.7. Funding requested is as follows:

Capital lines of expenditure	2019/2020	2020/2021	Total £
Total Capital	0	0	0
Resource lines of expenditure			
Regional Analyst – Band D	54,631.04	0	54,631.04
Regional Coordinator Detective Inspector	0	98,609	98,609
Uplift requested through Devon and Cornwall	54,631.04	98,609	153,240.04

- 3.8. This funding is underpinned by an existing signed s22 collaboration agreement (through decision PCD 695), which has been extended and remains in operation.
- 3.9. The creation of this role and functions will not impact on the MPS budget. If the funding is not approved, although that equally will not impact upon MPS budgets it will impact upon effectiveness against a national and ministerial priority and the MOPAC priority to protect vulnerable women and children. Implementation of this new post will enable the MPS to better collaborate with key partners.
- 3.10. Paragraph 9.6 of the MPS Financial Regulations states all agreements for the provision of services to other organisations will be on a basis of full cost recovery, except with the specific approval of MOPAC. The terms of the Home Office grant only allow for the direct costs of the staff employed, travel costs and any supplies and services to be claimed

4. Legal Comments

- 4.1. S22 of the Police Act 1996, as amended by Section 89 Police Reform and Social Responsibility Act 2011 allows the MOPAC, as the local policing body, in connection with the discharge of any its functions to enter into a collaboration agreement.
- 4.2. The MOPAC Scheme of Delegation at Clause 4.5 requires the Deputy Mayor for Policing and Crime to approve all collaboration agreements where the Act requires. As this is a policing body collaboration, it is required.

- 4.3. The Section 22 Collaboration Agreement approved in decision PCD 695 in February 2020, which originally covered the period up to the end of 2019/20, has now been extended by the Strategic Oversight Board in the form of APACCE agreement and therefore the terms of the agreement continue.
- 4.4. Paragraph 4.8 of the MOPAC Scheme of Delegation and Consent provides that the Deputy Mayor for Policing and Crime has delegated authority to approve all bids for grant funding.

5. GDPR and Data Privacy

- 5.1. The MPS is subject to the requirements and conditions placed on it as a 'State' body to comply with the European Convention of Human Rights and the Data Protection Act (DPA) 2018. Both legislative requirements place an obligation on the MPS to process personal data fairly and lawfully in order to safeguard the rights and freedoms of individuals.
- 5.2. Under Article 35 of the General Data Protection Regulation (GDPR) and Section 57 of the DPA 2018, Data Protection Impact Assessments (DPIA) become mandatory for organisations with technologies and processes that are likely to result in a high risk to the rights of the data subjects.
- 5.3. The Information Assurance and Information Rights units within MPS will be consulted at all stages to ensure the programme/project meets its compliance requirements.
- 5.4. The screening questions have been completed and a DPIA is not required because data sharing is covered in a data schedule within the S.22A Collaboration Agreement – in relation to the Modern Slavery Police Transformation Programme.

6. Equality Comments

- 6.1. MS is a crime type that affects the most vulnerable in society. The recruitment of a London regional coordinator will enhance the response to these complex investigations, which can only be a positive for victims of this crime type. The most extreme forms of exploitation impact on women and children. UK nationals now form the greatest volume of victims disproportionately affecting members of the BME community and those with disabilities.

7. Background/supporting papers

- 7.1. The previous approval is detailed in Decision PCD 294 dated November 2017.

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FOIA) and will be made available on the MOPAC website following approval.

If immediate publication risks compromising the implementation of the decision it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary.

Part 1 Deferral:

Is the publication of Part 1 of this approval to be deferred? NO

If yes, for what reason:

Until what date: N/A

Part 2 Confidentiality: Only the facts or advice considered as likely to be exempt from disclosure under the FOIA should be in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a **Part 2** form –NO

ORIGINATING OFFICER DECLARATION

Tick to confirm statement (✓)

Financial Advice:

The Strategic Finance and Resource Management Team has been consulted on this proposal.

✓

Legal Advice:

The MPS legal team has been consulted on the proposal.

✓

Equalities Advice:

Equality and diversity issues are covered in the body of the report.

✓

Commercial Issues

Commercial issues are not applicable.

✓

GDPR/Data Privacy

- GDPR compliance issues are covered in the body of the report.
- A DPIA is not required.

✓

Director/Head of Service:

The Interim Chief Finance Officer has reviewed the request and is satisfied it is correct and consistent with the MOPAC's plans and priorities.

✓

Chief Executive Officer

I have been consulted about the proposal and confirm that financial, legal and equalities advice has been taken into account in the preparation of this report. I am satisfied that this is an appropriate request to be submitted to the Deputy Mayor for Policing and Crime.

Signature

Date 10/6/20



Funding approval from the Modern Slavery Transformation Unit to the MPS.

MOPAC Investment Advisory & Monitoring meeting

Report by DCI Richard McDonagh on behalf of the Chief of Corporate Services

Part 1 – This section of the report will be published by MOPAC. It is classified as OFFICIAL – PUBLIC

EXECUTIVE SUMMARY

The NPCC Lead for Modern Slavery (MS), Devon and Cornwall Chief Constable Shaun Sawyer, and his team successfully bid into the Police Transformation Fund to support the national policing response to MS which led to the creation of the Modern Slavery Transformation Unit (MSTU).

The MPS has received funding from the Modern Slavery Transformation Programme since 2017 to employ a dedicated regional analyst. The original approval in November 2017 (PCD 294) covered funding received in 2017/18 and 2018/19. There is no grant available for this role in the current financial year as the role will cease.

This paper notes the funding received for the analyst role in 2019/21 and requests approval for receipt of funding for a new Regional Coordinator role in 2020/21. These posts are fully funded and do not lead to any additional cost for the MPS. This funding is underpinned by an existing s22 collaboration agreement.

Recommendations

The Deputy Mayor for Policing and Crime, via the Investment Advisory and Monitoring meeting (IAM), is asked to:

1. **Note funding of £54,631.04 received from the Modern Slavery Transformation Programme in 2019/20 for the London Regional Analyst position.**
2. **Approve funding of £98,609 in 2020/21 from the Modern Slavery Transformation Programme for the London Regional Coordinator.**
3. **Note that these posts are fully funded so they do not lead to any cost to the MPS.**
4. **Note that this funding is underpinned by an existing signed s22 collaboration agreement (through decision PCD 695), which has been extended and remains in operation.**

Time sensitivity

A decision is required from the Deputy Mayor by 21/05/2020. This is because funding approval is for this financial year only and so it's imperative that someone can be selected for the role as soon as possible. The selection process cannot be completed until the funding is approved.

Non-confidential facts and advice to the Deputy Mayor for Policing and Crime

Introduction and background

1. Year on year offences of Modern Slavery (MS) have seen a significant increase nationally with a 52% increase in 2019. The MPS undertake about a third of the national volume of MS investigations and are the lead investigative body in proactive MS investigations in terms of volume.
2. The current NPCC lead for MS is CC Shaun Sawyer based in Devon and Cornwall.
3. In September 2016 Devon and Cornwall, successfully bid to the Home Office for funding through the Police Transformation Fund to ensure that police and partners reduce the vulnerability, threat and risk surrounding MS criminal activity, establishing nationally coordinated action, assessment, guidance and training. This initiative has been highly successful and has achieved its aims of creating a more coordinated approach to the problem of MS.
4. It is vital that London continues to be well connected with the regions nationally.
5. The MPS specialist response to MS is the Vulnerability Investigation Team (VIT). This is the dedicated resource which was created through the transformation of the MPS response to organised crime in 2019, replacing the previous Modern Slavery Kidnap Unit (MSKU) with the VIT. The VIT have wider responsibilities relating to the triage, assessment and investigation of serious exploitation cases and offer support and guidance to local policing.
6. The MPS have obtained funding from the MSTU since 2017/18 for the purpose of a dedicated Regional Analyst only. This has provided much greater insight into the nature of the problem within London. This has been helpful because of the overall London volume which is a third of the national total. London trends are often indicative of the national picture, albeit criminal exploitation is where the greatest number of victims are exported across the UK from London.
7. The London Regional analyst role was filled in the MPS between 2017 and April 2020. The MPS regional analyst worked successfully within SCO36 – Met Intel, delivering on MSTU tasking and supporting the MPS. The full costs for the last financial year (2019/2020) were £54,631.04.
8. The MSTU have decided, in consultation with the National crime Agency that the analytical function delivered by the regional analysts will cease at the end of 2019/20 and be delivered as part of the function of a National Tasking Centre under the control of the NCA.
9. Future MS analytical requirements relating to modern slavery will now be completed by Met Intel, they will still have access to support from the MSTU and the NCA through a new National Coordination centre which is due to

start during the first quarter of 2020/21 (delayed owing to COVID 19). A raft of digital solutions are also being considered which if approved may assist the MPS response to the issue.

10. The MPS now seek to employ a London Regional coordinator which will be of great benefit to the MPS in delivering better outcomes on modern slavery investigations. The coordinator isn't a replacement for the analyst, these are two quite different roles.
11. The Regional Coordinator function will provide tactical advice and guidance across the MPS, City of London Police and British Transport Police. In addition they will support the collation of data requests and intelligence requirements on behalf of the National Police Transformation Team. This post will be directly funded by Devon & Cornwall but will work within the MPS.
12. Matters relating to selection / recruitment will be decided by the MPS. The post will be filled by a Detective Inspector.
13. Commander Sue Williams MPS Safeguarding Lead Responsible Officer for MPS has been consulted and is supportive of this proposal. She has appointed Detective Superintendent Tara McGovern as the Senior Responsible Owner (SRO) for Exploitation. She will have oversight of the coordinator role and will delegate daily management of this role holder to DCI Richard McDonagh
14. Therefore the request is seeks to ratify the transfer of Modern Slavery PTF money secured by Devon and Cornwall to fund the Regional Analyst for 2019/20 by way of the new section 22 agreement and to agree funding approval for the Regional Coordinator role for 2020/21.
15. The terms of the Sec 22 Collaboration agreement for 2019/20 continue following approval from the Strategic Oversight Board under an APACCE Agreement.
16. The Modern Slavery Transformation Programme and the MPS Directorate Legal Service team have been consulted and approve that this APACCE agreement is effective.

Issues for consideration

The first collaboration agreement with Devon and Cornwall was approved in decision PCD 294 in November 2017 for the financial years 2017/18 and 2018/19 along with funding for a dedicated analyst and triage centre over two years.

<https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/governance-and-decision-making/mopac-decisions-0/modern-slavery-unit>

Contributes to the MOPAC Police & Crime Plan 2017-2021¹

MS investigations are amongst the worst forms of exploitation and abuse affecting vulnerable women and children through sexual exploitation and enforced labour.

Financial, Commercial and Procurement Comments

1. The Modern Slavery Police Transformation programme is funded by the Police Transformation Fund grant. Under the terms of this grant the MPS is

¹ [Police and crime plan: a safer city for all Londoners | London City Hall](#)

reimbursed for actual staff costs and there are no financial pressures for the MPS.

2. The original approval from the Modern Slavery Police Transformation Fund, agreed a grant of £264,112 (£86,385 2017/18 and £177,727 2018/19). This approval has expired.
3. Further funding has been made available for 2019/20 and 2020/21 since the original approval.
4. This report covers the funding received for the analyst in 2019/20 at a cost of £54,631.04 and the funding planned for a regional coordinator for 2020/21 at an estimated cost of £98,609.
5. Costs of the analyst post are based on the real cost incurred.
6. The funding for the coordinator is based on the comparable cost of someone employed in a similar role within specialist crime.
7. Funding requested is as follows;

Capital lines of expenditure	2019/2020	2020/2021	Total £
Total Capital	0	0	0
Resource lines of expenditure			
Regional Analyst – Band D	54,631.04	0	54,631.04
Regional Coordinator Detective Inspector	0	98,609	98,609
Uplift requested through Devon and Cornwall	54,631.04	98,609	153,240.04

8. This funding is underpinned by an existing signed s22 collaboration agreement (through decision PCD 695), which has been extended and remains in operation.
9. The creation of this role and functions will not impact on the MPS budget. If the funding is not approved, although that equally will not impact upon MPS budgets it will impact upon effectiveness against a national and ministerial priority and the MOPAC priority to protect vulnerable women and children. Implementation of this new post will enable the MPS to better collaborate with key partners.
10. Paragraph 9.6 of the MPS Financial Regulations states all agreements for the provision of services to other organisations will be on a basis of full cost recovery, except with the specific approval of MOPAC. The terms of the Home Office grant only allow for the direct costs of the staff employed, travel costs and any supplies and services to be claimed.

Legal Comments

1. S22 of the Police Act 1996, as amended by Section 89 Police Reform and Social Responsibility Act 2011 allows the MOPAC, as the local policing body, in connection with the discharge of any its functions to enter into a collaboration agreement.

2. The MOPAC Scheme of Delegation at Clause 4.5 requires the Deputy Mayor for Policing and Crime to approve all collaboration agreements where the Act requires. As this is a policing body collaboration, it is required.
3. The Sec 22 Collaboration Agreement approved in decision PCD 695 in February 2020, which originally covered the period up to the end of 2019/20, has now been extended by the Strategic Oversight Board in the form of APACCE agreement and therefore the terms of the agreement continue.
4. Paragraph 4.8 of the MOPAC Scheme of Delegation and Consent provides that the Deputy Mayor for Policing and Crime (DMPC) has delegated authority to approve all bids for grant funding.

Equality Comments

MS is a crime type that affects the most vulnerable in society. The recruitment of a London regional coordinator will enhance the response to these complex investigations, which can only be a positive for victims of this crime type. The most extreme forms of exploitation impact on women and children. UK nationals now form the greatest volume of victims disproportionately affecting members of the BME community and those with disabilities.

Privacy Comments

The MPS is subject to the requirements and conditions placed on it as a 'State' body to comply with the European Convention of Human Rights and the Data Protection Act (DPA) 2018. Both legislative requirements place an obligation on the MPS to process personal data fairly and lawfully in order to safeguard the rights and freedoms of individuals.

Under Article 35 of the General Data Protection Regulation (GDPR) and Section 57 of the DPA 2018, Data Protection Impact Assessments (DPIA) become mandatory for organisations with technologies and processes that are likely to result in a high risk to the rights of the data subjects.

The Information Assurance and Information Rights units within MPS will be consulted at all stages to ensure the programme/project meets its compliance requirements.

The screening questions have been completed and a DPIA is not required because data sharing is covered in a data schedule within the S.22A Collaboration Agreement – in relation to the Modern Slavery Police Transformation Programme.

Real Estate Implications

There are no real estate implications.

Environmental Implications

There are no environmental implications.

Background/supporting papers

The previous approval is detailed in Decision PCD 294 dated November 2017.