

Operation LIGHT

Intelligence Data Report
October 2020



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Into the sunlight

SOHTIS
Survivors of Human Trafficking in Scotland

1. CONTEXT

Human trafficking is said to be the greatest human rights issue of our time. It is a violation which preys on some of the most vulnerable in society. The Scottish definition is set out in The Human Trafficking & Exploitation (Scotland) Act 1995¹ and is commonly referred to as the trading of adults and children for the purpose of personal gain or profit. Human trafficking is a complex, often hidden misunderstood crime which abuses human rights and dignity.

There is increasing awareness that it is an issue which ‘pervades every county and every community of the United Kingdom’² and victims of human trafficking have been found in all 32 Local Authorities across Scotland, including in rural areas as well as towns and cities. According to the National Referral Mechanism (NRM)³ data there was an increase of 125% in potential victims of trafficking recovered in Scotland in 2019 compared to the previous year, this is thought to be the ‘tip of the iceberg.’

Human trafficking can have profound and enduring effects on individuals and transgenerational effects on families and communities. In 2012, in an enquiry into human trafficking in Scotland, the Scotland Commissioner, Baroness Helena Kennedy QC, stated her aspiration that ‘Scotland will pioneer a zero-tolerance approach to human trafficking’.⁴ The Human Trafficking and Exploitation (Scotland) Act was passed in 2015,¹ followed by the Scottish Government’s first Human Trafficking and Exploitation Strategy in 2017.⁵ The Strategy, which is currently under review, aims to identify and support survivors, disrupt perpetrators and address the conditions which foster trafficking.

One of the main drivers of trafficking and exploitation is poverty. It is therefore the cause of grave concern that the immediate and long-term effects of the COVID-19 pandemic will force people out of employment, into financial instability creating a climate conducive to increased exploitation.

During the period of COVID-19, SOHTIS has made contingencies to enable the continuation of work to identify Potential Victims of Human Trafficking (PVOHT). Project Light is providing training to Non-Governmental Organisations (NGO’s) and statutory services in the East of Scotland, specifically in Edinburgh and Aberdeen. Training in line with Tier 1 of the Training Framework: Identification, Care and Support of Victims and Survivors of Modern Slavery and Human Trafficking⁶ and specifically tailored to specific service areas and client groups, has been made available to frontline staff. Due to the complexities involved in the identification of PVOHT and the current low level of knowledge and understanding across both sectors, SOHTIS is also providing a unique opportunity for organisations to receive post-training support which assists them with the implementation of the training at strategic and operational levels. The combination of training and ongoing support aims to increase the identification and recovery of PVOHT.

¹<https://www.legislation.gov.uk/asp/2015/12/contents/enacted>

²Independent Review of the Modern Slavery Act 2015: Final Report (2019), Foreword by Rt Hon Frank Field MP
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/803406/Independent_review_of_the_Modern_Slavery_Act_-_final_report.pdf

³<https://www.gov.uk/government/statistics/national-referral-mechanism-statistics-uk-end-of-year-summary-2019>

⁴<https://www.equalityhumanrights.com/en/our-work-scotland/human-rights-scotland/inquiry-human-trafficking-scotland>

⁵ <https://www.gov.scot/publications/trafficking-exploitation-strategy/>

⁶<https://www.skillsforcare.org.uk/Documents/Topics/Modern-Slavery/Training-Framework-Identification-Care-and-Support-of-Victims-and-Survivors-of-Modern-Slavery-and-Human-Trafficking.pdf>

2. BACKGROUND

Despite 90% of participants in Project Light training having more than five years of experience supporting vulnerable people, they reported having no awareness of human trafficking. Where participants had witnessed identifiable factors of trafficking there was fear and uncertainty about the how to report or navigate the reporting system and where reporting had taken place it proved not to result in satisfactory outcomes for the PVOHT.

Victims of human trafficking can be subjected to multiple types of exploitation, one of which is criminal exploitation. Victims may also be criminally exploited in more than one way, for example, being forced to commit petty crime, fraudulently claim benefits, carry illegal drugs, work in cannabis farms or engage in forced begging.

During Project Light initiatives, SOHTIS has uncovered repeated concerns amongst NGO's regarding "forced begging" or "suspected forced begging" on the streets of Edinburgh. This has been endorsed by national research highlighting homelessness as being both a driver and result of trafficking and exploitation and in research conducted recently in Edinburgh into forced begging and homelessness. 'Not Really Homeless?'⁷ reported concerns from Scottish and UK anti-trafficking stakeholders and local homelessness NGO's regarding issues of forced begging over an extended period in Edinburgh city.

Those who are subjected to forced begging may be required to hand over all or most of their 'earnings' to the person who is exploiting them. This can result in having insufficient money to survive regardless of the amounts given by members of the public. They may also be required to pay their exploiters for services such as transport, accommodation and protection resulting in them being in debt bondage.

Physical violence and psychological pressure is often associated with forced begging, with people being beaten, threatened, forced to take drugs which can result in addiction and increasing dependency on exploiters. Often, but not exclusively, victims of forced begging are migrants who come to the UK from low income countries in the search of higher incomes and better economic opportunities, they become targets for traffickers who force them into begging. It is also widely accepted that victims of trafficking are often subject to multiple forms of exploitation. Therefore a victim who is forced to beg on the streets during daylight hours may be subjected to sexual exploitation or forced labour in the evening.

As a result of the recent Project Light post-training support provided to NGO's in Edinburgh by SOHTIS, a request was received from Streetwork (Simon Community Scotland) for advice and guidance regarding potential exploitation amongst their service users. Streetwork are currently supporting around 450 homeless people, around 90 of whom are Romanian. They initially raised specific safeguarding issues regarding the welfare of an 18-year-old pregnant Romanian woman who had appeared on the streets. Streetwork frontline staff expressed concern that she might be forced to beg and may have been trafficked to Scotland from Romania. Kirsty Allan, Project Manager, SOHTIS, has subsequently provided a key role in supporting Streetwork staff who were engaging with the PVOHT and in liaising with Police Scotland.

Following safeguarding procedures, SOHTIS raised initial concerns with DI Paul Grieg, E Division, Police Scotland. Police subsequently carried out safeguarding checks at the reported location. No further action was taken by police at that stage with more intelligence being required prior to any further action.

⁷Not Really Homeless, Claire Larenson, August, 2020

Over a four week period, Kirsty Allan was able to provide remote support on a daily basis to Streetwork via named contact Alice Castlenuovo. This included providing information and tools on how to identify the signs of trafficking in specific situations as well as advice on victim care. Over these weeks concerns grew regarding the large number of Romanians continually arriving on the streets. Following further discussions with Police Scotland, it was agreed that SOHTIS would carry out a site visit to Edinburgh to assess the situation and to compile this Intelligence Data Report on potential trafficking. Operation LIGHT was planned as a multi-agency initiative to take place on the 14-16 October 2020.

3. OPERATION LIGHT

Operation LIGHT took place on 14-16 October 2020 in Edinburgh with key partners being; SOHTIS, Streetwork, E Division, Police Scotland and Justice & Care. The specific objectives of the Operation were to, increase understanding of suspected forced begging in the city and to gather intelligence and information regarding PVOHT. The geographical areas for the Operation were selected based upon several weeks of engagement with potential victims by Streetwork where SOHTIS had provided remote support and were responsible for intelligence gathering.

The objectives of Operation LIGHT also deliver the priorities identified by the Scottish Government both in Action Area One of the Human Trafficking & Exploitation Strategy 2017⁵ and as set out in their Third Annual Report and Strategy Review⁸ in May 2020.

Summary Results

‘The journey from being a victim to becoming a survivor is unique for each individual and without the right support in place, it is a journey many individuals cannot make.’

Despite the magnitude and complexity of human trafficking and exploitation where there is a willingness to utilise multi-agency expertise we can develop effective long-term solutions which prioritise victim care and result in the prosecution of perpetrators.

Operation LIGHT has heightened awareness of high levels of vulnerability to trafficking and exploitation on the streets of Edinburgh. This has been particularly evidenced within the homeless and street begging community which was the primary subject of this Operation, however, it is recognised that it extends beyond this community to other vulnerable groups in the city.

Due to the remarkable efforts and commitment made in this Operation to partnership working, the intelligence gathered over a relatively short timescale, has shown compelling indicators of forced begging, benefit fraud, sexual exploitation and debt bondage. Continued and extension of these partnerships to include other relevant stakeholders combined with anti-human trafficking expertise will result in the identification of potential victims of trafficking, excellent victim focused crisis care, a route out of exploitation, a reduction in the vulnerability which can lead to re-trafficking and a disruption of activities by perpetrators. The current global pandemic presents both challenges and opportunities in our response to human trafficking in Scotland and therefore makes the response ever more urgent.

⁸<https://www.gov.scot/binaries/content/documents/govscot/publications/progress-report/2020/05/trafficking-exploitation-strategy-third-annual-progress-report-strategy-review/documents/trafficking-exploitation-strategy-third-annual-progress-report-strategy-review/trafficking-exploitation-strategy-third-annual-progress-report-strategy-review/govscot%3Adocument/trafficking-exploitation-strategy-third-annual-progress-report-strategy-review.pdf?forceDownload=true>

4. METHODOLOGY

In planning for Operation LIGHT, SOHTIS developed a detailed Operational Plan which included; aims, scope, schedule, roles and responsibilities and risk assessment. The following elements were considered paramount to the Operation:

- Victim care was central to this Operation and to all previous and any subsequent engagement. All activities were carried out in line with The Slavery and Trafficking Survivor Care Standards 2018
- Sharing of information about PVOHT was subject to Confidentiality and GDPR organisational policies and procedures and in accordance with national guidelines
- The importance of partnership working and the value of combining expertise was essential
- Safeguarding risk assessments were in place in order that concerns were appropriately reported
- Victims under the age of 18 years were considered as minors under the Human Trafficking & Exploitation (Scotland) Act 2015¹
- The three elements which establish a case of human trafficking: the act, means, purpose were used in the identification of PVOHT

SOHTIS developed a Human Trafficking Indicator Framework to assist in the identification of victims appropriate to Operation LIGHT. These were rated low, medium or high and were based on potential victims physical, psychological, economic and social needs as detailed below:

SAFEGUARDING
Date of birth
Caring responsibilities/dependents
Suspected Learning disability
Risk or threat posed to PVOHT
Risk or threat posed to any other person
Potential substance misuse
PHYSICAL & PSYCHOLOGICAL
Any physical disability observed or identified by the PVOHT
Any psychological observed or identified by the PVOHT
Pregnancy and level of engagement with statutory services
Date of arrival in the country (concerns regarding COVID-19 risks)
Dressed appropriate for the weather and the activities being undertaken
Willingness to engage with medical services where required
ECONOMIC
Mode/payment/arrangement of transport (to UK)
Daily earnings
Requirement to give anyone earnings
Requirement to pay for securing work
Requirement to pay anyone for any other services

SOCIAL & PERSONAL
Level of engagement
Speaks/understands English
Someone speaks on behalf of the PVOHT
Secure accommodation/who living with/knows their address
Freedom of movement at will
Acts as though being observed
Fearful of authorities
Does not present ID
Displays fearful/sexualised
Displays controlling behaviour

The building of trust from the earliest stages of engagement is essential when working to identify PVOHT. In this Operation, Streetwork had already established trusting relationships both with individuals and across the community of homeless people. Working in partnership with them provided SOHTIS with effective opportunities for meaningful conversations and intelligence collection with PVOHT.

5. OBSERVATIONS & FINDINGS

5.1 Observations

The following observations were made by SOHTIS during the course of Operation LIGHT:

- NGO's providing support services to vulnerable groups are working under increased pressure due to the effects of COVID-19 which has increased demand and requires additional resource due to regulations.
- Air routes from Romania to Scotland have been redirected from Glasgow airport to Edinburgh airport over recent months. Discussions with Justice and Care, Victim Navigator, based at Glasgow Airport confirmed they had witnessed a reduction in numbers of PVOHT presenting at the airport. This may explain the increase in numbers of Romanians on the streets of Edinburgh.
- A significant number of rough sleepers and street beggars encountered had reported arriving in Edinburgh from Romania within the previous 14 days. This raises concerns regarding the adherence to COVID-19 quarantine restrictions and the public health implications of non-compliance.
- At present all temporary accommodation in Edinburgh is managed by the City of Edinburgh Council with the exception of rapid access accommodation (approximately 60 spaces), which is allocated by Streetwork. Individuals require to present at their allocated Locality Office in order to access accommodation and begin a Homeless Assessment.

Individuals can only be accommodated if they are found to be unintentionally homeless, pending the result of the Homeless Assessment. The client must fulfil the required criteria to be accommodated. This commonly includes proving a local connection to Edinburgh or providing evidence of a period of employment. Due to COVID-19, the Council at present are required to provide accommodation while applicants are waiting to know their eligibility status which can be up to three months.

- The current global pandemic provides unique opportunities to identify and address issues of human trafficking; at ports, within Test & Protect and in the current housing provision by Edinburgh City Council.
- Concerns regarding the validity of individuals ID which suggested they were 18 years.
- Due to COVID-19 restrictions and the resulting low footfall in the city, 'earnings' by those begging is currently significantly reduced.
- Fears exist amongst NGO's and statutory services regarding the identification of PVOHT, the referral pathway and concerns about benefits for potential victims.
- Police Scotland operations and safeguarding visits to identify potential victims of trafficking should include specialist NGO partners in order to ensure good victim care and be in accordance with The Slavery and Trafficking Survivor Care Standards 2018.⁹
- Without specialist anti-trafficking support NGO/frontline staff would find it impossible to identify and provide adequate victim care to PVOHT.
- The Initial Referral Discussion (IRD) process can lead to inconsistencies in identification and quality of care of PVOHT across Scotland.
- Many of the Recommendations set out below are consistent with the Priorities identified by the Scottish Government in the Human Trafficking & Exploitation Strategy Third Annual Report and Strategy Review⁸ and require urgent action towards implementation.

⁹<https://www.antislaverycommissioner.co.uk/media/1235/slavery-and-trafficking-survivor-care-standards.pdf>

5.2 Findings

The following findings were made by SOHTIS during the course of Operation LIGHT:

Over the two day period of Operation LIGHT, SOHTIS in partnership with Streetwork, encountered 43 individuals engaged in begging on the streets of Edinburgh. Although not all individuals were showing signs of being victims of trafficking, due to their multiple vulnerabilities all were considered to be a high risk of becoming victims of exploitation. Using the SOHTIS Human Trafficking Indicator Framework, 26 of the individuals encountered were considered high risk of being PVOHT, as follows:

	Under 18	18-20yrs	21-40yrs	Over 40yrs	Total
Male	2	2	6	3	13
Female	0	6	6	1	13
Total	2	8	12	4	26

These included two pregnant women, one of which was 32 weeks pregnant and three individuals who were considered to be connected to, or part of potential Organised Crime Gangs. A child of under 5 years was also observed, however, it was not possible to engage with them at the time of the Operation. More detailed information including specific intelligence will form an Appendix to this report and will be made available to appropriate stakeholders.

Of the 26 individuals deemed high risk as PVOHT, the majority travelled by air to Scotland from Romania arriving in Edinburgh airport before continuing to the city centre. There were a number of individuals identified who had travelled by bus. Initial intelligence raises concern that seven individuals might be held in debt bondage to their exploiters and ten admitted to having to give money to the boss or 'padrona'. There were also indicators of potential benefit fraud.

Particular concerns were highlighted where PVOHT stated they were required to give finances to the "padrona". On further investigation it was reported that individuals are currently required to pay £2 per day to the "padrona", this leaves the individual with very little funds for themselves and can amount to significant 'earnings' for the 'padrona'. For example assuming that 45, half of those being supported by Streetwork, are being exploited in this way and are providing £2 a day, the "padrona" could be 'earning' around £33,000 per year. This demonstrates how profitable human trafficking for forced begging can be even at a time when the footfall on Edinburgh streets is low. It is expected that daily charges being made by 'padronas' would be much higher than £2 at other times.

Case study

One woman confirmed having travelled to the UK from Romania in the previous two to three weeks having had her travel arranged by 'the man'. She reported paying £350 for a single ticket to the UK via bus, (estimated actual cost £100). She explained she had three children, left behind with her mother. She wished to be able to provide better for her children. She explained that she was required to pay back the individual who had purchased the ticket, however this was difficult as she was making very little on the streets each day. She was not from a "Roma" background and she spoke with limited but understandable English. She wept as she described how she had hoped to earn enough money to send back to her children. She now was begging on the streets in the hope she could pay her debt, and also try to buy another ticket in order to return to Romania to her children.

It was clear from observations and the movements of those involved that most of these 26 were being controlled by others, this was particularly evident when the community 'leader' was present the individual did not speak and became anxious. Others were more obviously being controlled and intimidated by people out with their community who appeared to be British nationals.

Some also reported there were 'members of the public' who were eager to provide them with assistance. This raises concerns about possible recruitment for further exploitation.

Individuals were not dressed appropriately for the weather and outdoor activities with several women wearing layered pyjamas and inadequate footwear, raising concerns for their physical wellbeing as winter approaches.

Case Study

Women observed in one city centre location begging from 7am-6pm. On previous days she had consistently not engaged with Streetwork staff seemingly not to understand any English or Romanian. She suddenly responded when offered a carton of orange juice understanding the offer in Romanian and accepting. She presented agitated and not making eye contact and would answer no further questions. After a short time a British man approached and disrupted the interaction with Streetwork and SOHTIS teams. He was intimidating and spoke directly to the women. The outreach team withdrew to avoid a confrontation. Another younger, British man was also observed checking on the woman. Concerns raised that this same individual is exerting control on others of the Roma community and is responsible for impregnating two other young Roma women.

It was found that there were significant barriers to individuals securing accommodation. Under the current system individuals are required to report to ECC Locality Offices from 10 00hrs on weekdays. This is a time when they would already have begun 'working' on the streets. Since begging is their only form of income and if they are being required by an exploiter to beg then attending an office which is often a considerable distance from the City Centre is difficult. On attending the Locality Office it was found that there may not be accommodation available for them that day, they are therefore offered an overnight in the Bethany Christian Trust Welcome Centre and the next morning required to repeat the process. As a result of many being unable or unwilling to engage with this system 13 of the 26 considered high risk were rough sleepers.

Whilst COVID-19 presents many challenges for work supporting vulnerable people. It was also identified that there are also unique opportunities to engage with homeless people who are currently being provided with temporary housing.

It was also found that these individuals are trapped in a cycle of poverty, homelessness and begging. Even where they accept short-term accommodation, it is almost impossible for those who are PVOHT to exit their situation without specialist support. They do not have the finance to return home and few have the language or other skills to secure legal work, this increases their risk of further exploitation.

6. RECOMMENDATIONS

These recommendations are made by SOHTIS following remote support of NGO activity on the ground and the collection of intelligence during Operation LIGHT. The recommendations aim to reduce the incidence of vulnerable individuals becoming victims of exploitation, improve the identification of PVOHT and secure a safe destination which ends the cycle of vulnerability and trafficking and provide intelligence which results in perpetrators being brought to justice:

- The formation of a multi-agency team; including SOHTIS, Justice and Care, Border Force, Police Scotland and Edinburgh Airport and any other relevant stakeholder to effectively identify PVOHT on arrival in Edinburgh ports and the establishing of referral routes and after care options, including the development of safeguarding checks on arrivals on all high risk flights arriving in Edinburgh Airport.
- Development of a referral pathway and partnership agreement for pre-NRM care between SOHTIS and Justice and Care, creating opportunity for early interventions at Glasgow and Edinburgh Airports. This will include the development of safeguarding checks on all high-risk flights arriving in Edinburgh.
- A Safeguarding Risk Assessment developed for the COVID-19 Test & Protect service in Scotland to ensure the safety of overseas arrivals and reduce the risk of threats to public health.

- Training and support to statutory services in their role as first responders and the consistent implementation of the Human Trafficking and Exploitation Guidance for Local Authorities.¹⁰
- Training and post-training support available to more frontline workers in the Third Sector increasing knowledge of human trafficking and demonstrating behaviour change including increased identification of PVOHT.
- Increased multi-agency working combining frontline staff and anti-human trafficking expertise to ensure identification and high quality victim care of PVOHT.
- Expert NGO anti-trafficking involvement in Police Scotland Operations in order to ensure quality victim focused care.
- Delivery of a victim focused prevention programme enabling vulnerable individuals accessing homelessness and other accommodated services to be able to identify and avoid exploitation, be aware of their rights and where appropriate be given a safe payment option for repatriation to their country of origin.
- Pre and post NRM tailored personal support plans for individuals considered at risk which break the cycle of exploitation.
- Training of customer facing staff in high street banks, HMRC, Job Centres and Citizen Advice Bureaus to improve identification of PVOHT and the creation of safeguarding assessments to be used for new bank accounts being opened and benefit claims.

7. NEXT STEPS

The following steps will be taken towards delivering on the above recommendations:

- SOHTIS will circulate the intelligence gathered to date on Operation LIGHT to relevant stakeholders.
- Resources including funding identified to support the implementation of the Recommendations and Next Steps.
- SOHTIS to discuss Findings and Recommendations with the Scottish Government.
- SOHTIS will continue to work with Streetwork, Police Scotland and all other relevant stakeholders to gather further evidence for Operation LIGHT, provide advocacy to potential victims and ensure effective referral pathways on recovery of victims and for ongoing care.
- SOHTIS will deliver further training and post-training support via Project Light to relevant organisations to improve understanding and knowledge of human trafficking and see increase in victim identification.

¹⁰<http://www.migrationscotland.org.uk/uploads/COSLA%20Human%20Trafficking%20Guidance%20-%20October%202019%20%281%29.pdf>

- SOHTIS will support Local Authorities to implement the Human Trafficking and Exploitation Guidance¹⁰.
- SOHTIS will liaise with Justice and Care to develop a referral pathway to SOHTIS Project Integrate providing pre-NRM support to potential victims identified at ports.
- Justice and Care will conduct a Multi-Agency Intensification Programme in December 2020 and January 2021 to identify PVOHT entering the country via Glasgow Airport.
- Justice and Care will liaise with SOHTIS and other stakeholders on a multi-agency approach to identifying PVOHT at Edinburgh Airport and other ports in Scotland.
- SOHTIS agreed to support Police Scotland with further human trafficking investigations.
- SOHTIS will develop Safeguarding Risk Assessments tailored for specific areas of identification, including; children and young people, homeless, BAME, sex workers and others as identified.
- SOHTIS will liaise with homeless accommodation providers to identify opportunities to deliver a prevention and advocacy programme.

8. REFERENCES

¹<https://www.legislation.gov.uk/asp/2015/12/contents/enacted>

²Independent Review of the Modern Slavery Act 2015: Final Report (2019), Foreword by Rt Hon Frank Field MP

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/803406/Independent_review_of_the_Modern_Slavery_Act_-_final_report.pdf

³<https://www.gov.uk/government/statistics/national-referral-mechanism-statistics-uk-end-of-year-summary-2019>

⁴<https://www.equalityhumanrights.com/en/our-work-scotland/human-rights-scotland/inquiry-human-trafficking-scotland>

⁵ <https://www.gov.scot/publications/trafficking-exploitation-strategy/>

⁶<https://www.skillsforcare.org.uk/Documents/Topics/Modern-Slavery/Training-Framework-Identification-Care-and-Support-of-Victims-and-Survivors-of-Modern-Slavery-and-Human-Trafficking.pdf>

⁷Not Really Homeless, Claire Larensen, August, 2020

⁸<https://www.gov.scot/binaries/content/documents/govscot/publications/progress-report/2020/05/trafficking-exploitation-strategy-third-annual-progress-report-strategy-review/documents/trafficking-exploitation-strategy-third-annual-progress-report-strategy-review/trafficking-exploitation-strategy-third-annual-progress-report-strategy-review/govscot%3Adocument/trafficking-exploitation-strategy-third-annual-progress-report-strategy-review.pdf?forceDownload=true>

⁹<https://www.antislaverycommissioner.co.uk/media/1235/slavery-and-trafficking-survivor-care-standards.pdf>

¹⁰<http://www.migrationscotland.org.uk/uploads/COSLA%20Human%20Trafficking%20Guidance%20-%20October%202019%20%281%29.pdf>

SOHTIS

www.sohtis.org

enquiries@sohtis.org

Scottish Registered Charity: SC594053

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