

**Force Disclosure Unit**

Wiltshire Police HQ
London Road

Devizes

Wiltshire

SN10 2DN

Tel 101 ext. 62005

Website: www.wiltshire.police.uk

Email: disclosure@wiltshire.police.uk



XXXXXXXXXX
By email

Date: 14th April 2022

Our ref: FOI 2022/099

Reply contact name is: Abigail Standidge

Dear XXXXX,

I write in connection with your request for information dated 22nd March 2022, concerning Modern Slavery point of contact / policy and procedure and Missing Persons policy and procedure.

I am required by the Freedom of Information Act 2000 to handle all requests in a manner that is blind as to the identity and motives of the requestor. Any information released as a response to a request is regarded as being published and therefore in the public domain without caveat.

Following receipt of your request, research was conducted by the MSHT Strategic Lead, MSHT Tactical Lead, MSHT Advisor and Force Policy Officer at Wiltshire Police.

Your request for information has now been considered and I am able to respond as follows.

You wrote:

We have considered the response to a police super complaint submitted by Hestia : Police Response to Victims of Modern Slavery (<https://www.gov.uk/government/publications/police-response-to-victimsof-modern-slavery/the-hidden-victims-report-on-hestias-super-complaint-on-the-police-response-to-victims-of-modernslavery--2>)

1. Paragraph 12.1 of the report includes the following: '....All forces have dedicated specific points of contact for modern slavery....'

Please provide:

- a. the name and contact details for the point of contact for modern slavery within your force.
- b. a breakdown of the responsibilities for the point of contact.
- c. confirmation if external organisations can contact the point of contact directly.

If your force does not have a specific point of contact for modern slavery please confirm this.

2. We understand that each local police force is required to have a policy and/or procedure that details how the force will respond to victims of trafficking and modern slavery (VoMS). We understand that the policy and procedure documents/guides are distinct items. In particular that a policy document is akin to an



INVESTOR IN PEOPLE

overview of the approach a force will take. The procedure document is a detailed operational document. In this request we seek BOTH the policy and procedure documents. Specifically please provide:

- a. Your force procedure for responding to VoMS
 - b. Your force policy for responding to VoMS
 - c. Where your force has a distinct policy and / or procedure document relating to different situations for modern slavery, please provide:
 - i. the force policy and procedure document for 'county lines'
 - ii. the force policy and procedure document for 'cannabis houses'
 - iii. the force policy and procedure document for 'domestic workers'
3. We understand that each local police force is required to have a policy and/or procedure that details how they will deal with reports of missing persons. We understand that the policy and procedure documents/guides are distinct items. In particular that a policy document is akin to an overview of the approach a force will take. The procedure document is a detailed operational document. In this request we seek BOTH the policy and procedure documents. Specifically please provide:
- a. Your force procedure for responding to reports of missing persons
 - b. Your force policy for responding to reports of missing persons
 - c. Your force named point of contact and the contact details for reporting missing persons
4. Please confirm:
- d. If your force procedure for responding to reports of missing persons has anything in it specifically relating to missing potential or recognised victims of modern slavery (whether they have not yet been referred into the National Referral Mechanism, whether they are still within it after receiving a positive reasonable grounds decision, or whether they have received a positive conclusive grounds decision)
 - e. Your force policy for responding to reports of missing persons specifically relating to missing potential or recognised VoMS (whether they have not yet been referred into the National Referral Mechanism, whether they are still within it after receiving a positive reasonable grounds decision, or whether they have received a positive conclusive grounds decision)
 - f. Your force named point of contact and the contact details for reporting missing persons specifically if they are a point of contact for missing potential or recognised VoMS (whether they have not yet been referred into the National Referral Mechanism, whether they are still within it after receiving a positive reasonable grounds decision, or whether they have received a positive conclusive grounds decision)

Additional question, dated 14/02/2022

5. Please can you confirm if the police and the Crown Prosecution Service (CPS) record Modern Slavery Offences and other offences relevant to trafficking but contained in other Acts?

The government says the CPS cannot confirm how many employers of domestic workers have been investigated / sanctioned / prosecuted for their treatment. The CPS records data on the number of offences charged and defendants who have been prosecuted for an offence under the Modern Slavery Act 2015, however, without a manual review of all Modern Slavery Act cases, they are unable to disaggregate cases of domestic servitude from that data.

Our response

1. Paragraph 12.1 of the report includes the following: '....All forces have dedicated specific points of contact for modern slavery....'

Please provide:

- a. the name and contact details for the point of contact for modern slavery within your force.

Note: The names of officers at lower rank are usually not disclosed into the public domain. This is because it would not be reasonably expected, at their level of responsibility, for these details to be disclosed. The names of officers at Chief Inspector rank or above can usually be disclosed, as you can reasonably expect for their names to be within the public domain as a result of their role.

Having said this, the information you are requesting is exempt by virtue of Section 21 of the Freedom of Information Act 2000 – Information accessible to applicant by other means. However, I have provided the officer's names below to show their role within Modern Slavery and Human Trafficking (MSHT).

MSHT Strategic Lead – Detective Superintendent Ben Mant ([link](#) - Senior Management Team)

MSHT Tactical Lead / Subject Matter Expert – Detective Chief Inspector Phil Walker ([link](#) - OPCC article)

MSHT Advisor – Detective Inspector Eirin Martin ([link](#) - MSHT operation article)

- b. a breakdown of the responsibilities for the point of contact.

No information held.

Under the Freedom of Information Act 2000, there is not a requirement for a public authority to create data in order to provide a response to a request for information. The information needed to provide a response to this request is not held, and therefore the information would need to be provided off the knowledge of the MSHT Tactical Lead / Subject Matter Expert.

Note: The following information is being provided outside of the constraints of the FOIA, as we felt it would be unreasonable not to provide you with a response to this request.

The role of Tactical Lead involves offering guidance and support to the Force in respect of Modern Slavery and Human Trafficking (MSHT) investigations; providing training and awareness inputs; identifying emerging threats and trends through liaison with partner agencies and other Forces; representing the Force at Regional meetings; and continuing to develop the Force response to MSHT.

- c. confirmation if external organisations can contact the point of contact directly.

The information you are requesting is exempt by virtue of Section 21 of the Freedom of Information Act 2000 – Information accessible to applicant by other means.

The following link will take you to the Modern Slavery helpline website, which will detail how an individual can get in touch with the organisation - <https://www.modernslaveryhelpline.org/>. Details of additional organisations can be found by following this link to the Wiltshire Police website - <https://www.wiltshire.police.uk/advice/advice-and-information/ms/modern-slavery/>.

If your force does not have a specific point of contact for modern slavery please confirm this.

2. We understand that each local police force is required to have a policy and/or procedure that details how the force will respond to victims of trafficking and modern slavery (VoMS). We understand that the policy

and procedure documents/guides are distinct items. In particular that a policy document is akin to an overview of the approach a force will take. The procedure document is a detailed operational document. In this request we seek BOTH the policy and procedure documents. Specifically please provide:

- a. Your force procedure for responding to VoMS
- b. Your force policy for responding to VoMS
- c. Where your force has a distinct policy and / or procedure document relating to different situations for modern slavery, please provide:
 - i. the force policy and procedure document for 'county lines'
 - ii. the force policy and procedure document for 'cannabis houses'
 - iii. the force policy and procedure document for 'domestic workers'

Please see attached Modern Slavery (MSHT) Policy and Procedure.

Note: This policy is now part of a longer term project and therefore the review of this policy will be delayed until this project has been completed. It is not possible, at this time, to estimate a revised timetable for the review to be completed.

3. We understand that each local police force is required to have a policy and/or procedure that details how they will deal with reports of missing persons. We understand that the policy and procedure documents/guides are distinct items. In particular that a policy document is akin to an overview of the approach a force will take. The procedure document is a detailed operational document. In this request we seek BOTH the policy and procedure documents. Specifically please provide:
 - a. Your force procedure for responding to reports of missing persons
 - b. Your force policy for responding to reports of missing persons

Please see attached Missing Persons Policy and Procedure.

Note: This policy is now part of a longer term project and therefore the review of this policy will be delayed until this project has been completed. It is not possible, at this time, to estimate a revised timetable for the review to be completed.

- c. Your force named point of contact and the contact details for reporting missing persons

Missing Person Strategic Lead – D/Supt Ben Mant

Missing Person Tactical Lead – D/Insp Eirin Martin

4. Please confirm:

- d. If your force procedure for responding to reports of missing persons has anything in it specifically relating to missing potential or recognised victims of modern slavery (whether they have not yet been referred into the National Referral Mechanism, whether they are still within it after receiving a positive reasonable grounds decision, or whether they have received a positive conclusive grounds decision)
- e. Your force policy for responding to reports of missing persons specifically relating to missing potential or recognised VoMS (whether they have not yet been referred into the National Referral Mechanism, whether they are still within it after receiving a positive reasonable grounds decision, or whether they have received a positive conclusive grounds decision)

The current Missing Persons Policy and Procedure document does not make specific reference to MSHT / NRM, although this is something that is being reviewed. It does reference child exploitation and includes a link to the MSHT policy; which does reference the NRM.

- f. Your force named point of contact and the contact details for reporting missing persons specifically if they are a point of contact for missing potential or recognised VoMS (whether they have not yet been referred into the National Referral Mechanism, whether they are still within it after receiving a positive reasonable grounds decision, or whether they have received a positive conclusive grounds decision)

The information you are requesting is exempt by virtue of Section 21 of the Freedom of Information Act 2000 – Information accessible to applicant by other means.

There is not an individual point of contact for reporting a missing person. A person can be reported missing through 999 (in an emergency), 101 (non-emergency) or through the following link ('Report a Missing Person' page) - <https://www.wiltshire.police.uk/ro/report/mp/v1/report-missing-person/>; all of which go through to our Control Centre for assessment / allocation.

5. Please can you confirm if the police and the Crown Prosecution Service (CPS) record Modern Slavery Offences and other offences relevant to trafficking but contained in other Acts?

The government says the CPS cannot confirm how many employers of domestic workers have been investigated / sanctioned / prosecuted for their treatment. The CPS records data on the number of offences charged and defendants who have been prosecuted for an offence under the Modern Slavery Act 2015, however, without a manual review of all Modern Slavery Act cases, they are unable to disaggregate cases of domestic servitude from that data.

Wiltshire Police record all MSHT offences in accordance with Home Office Counting Rules. This will include any other offences identified that do not fall under the Modern Slavery Act i.e. money laundering fraud etc.

Under our Section 16 duty to provide advice and assistance, we would advise you to direct your query to the Home Office as they may be able to assist further.

Section 17 of the Freedom of Information Act 2000 requires Wiltshire Police, when refusing to provide such information (because the information is exempt) to provide you the applicant with a notice which: (a) states that fact, (b) specifies the exemption in question and (c) states (if that would not otherwise be apparent) why the exemption applies.

The exemption applicable to the information requested is:

Section 21 – Information Accessible to the Applicant by Other Means

I am satisfied that all the relevant information has been passed to me and been considered in the light of your request within the time constraints applicable under the legislation.

Wiltshire Police would like to thank you for the interest that you have shown in the Force.

Yours sincerely

Abigail Standidge
Force Disclosure Decision Maker

Wiltshire Police offers a re-examination of your case under its review procedure.



Force Disclosure Unit

Wiltshire Police HQ, London Road, Devizes, Wiltshire SN10 2DN
Telephone 101 ext 62005



Freedom of Information Request Appeals Procedure

1. Who Can Ask for a Review

Any person who has requested information from Wiltshire Police, which has been dealt with under the Freedom of Information Act, is entitled to complain and request an internal review, if they are dissatisfied with the response they received.

2. How to Request a Review

Requests for review of a Freedom of Information request must be made in writing to the:

Force Disclosure Unit
Wiltshire Police Headquarters,
London Road, Devizes,
Wiltshire,
SN10 2DN

Email at disclosure@wiltshire.police.uk.

The reference number, date of the request and details of why the review is being requested must be included. Requests for review should be brought to the attention of the Force Disclosure Unit within 20 working days of the Force's response to the original Fol request.

3. Review Procedure

Receipt of a request for review will be acknowledged in writing to include confirmation of the reasons for the review. The review will be conducted by another Decision Maker, who is independent from the original Decision Maker. The Force Disclosure Unit will set a target date for a response. The response will be made as soon as is practicable with the intention to complete the review within twenty working days. In more complex cases the review may take up to 40 working days.

The Independent Decision Maker will conduct a review of the handling of the request for information and of decisions taken, including decisions taken about where the public interest lies in respect of exempt information where applicable. The review enables a re-evaluation of the case, taking into account the matters raised by the complaint.

4. Conclusion of the Appeal

On completion of the review the Independent Decision Maker will reply to the complainant with the result of the review. If the complainant is still dissatisfied following the review they should contact the Information Commissioner to make an appeal. The Information Commissioner can be contacted via the following details:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 01625 545 700
Fax: 01625 524 510
Email: mail@ico.gsi.gov.uk

Please note that the ICO's offices will be closed for the foreseeable future and are therefore unable to receive correspondence via post.

If you should wish you contact them, please visit <https://ico.org.uk/global/contact-us/>