

# The North Wales Vulnerability and Exploitation Strategy **2021-2024**



**Bwrdd Bregusrwydd a Chamfanteisio**  
Gogledd Cymru • North Wales  
**Vulnerability and Exploitation Board**

*‘Working in partnership to tackle Violence Against Women,  
Domestic Abuse and Sexual Violence (VAWDASV)  
and Modern Slavery, Human Trafficking and Exploitation.’*

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# Foreword

## Stephen Hughes, Chair - North Wales Vulnerability and Exploitation Board

Tackling exploitation of the most vulnerable in society remains one of the most important challenges for us all. Working together in effective partnership to reduce vulnerability and exploitation is a priority for all statutory agencies and our colleagues in the voluntary sector across North Wales. The impact and issues arising from cases of domestic abuse, child sexual exploitation, modern slavery, county lines and other serious crimes are often much wider than policing alone, and an effective response can only be delivered in partnership.

Effective partnership working forms the cornerstone of efforts to protect the most vulnerable in our communities. The Vulnerability and Exploitation Board is designed to capture and guide that partnership work and it will be the Board that will oversee the delivery of this strategy.

It is the clear intent of all agencies to improve the lives of vulnerable people living in North Wales. We all have a collective responsibility to identify potential victims due to vulnerability and to safeguard them from further risk of harm.

The following pages set out the actions to be taken by all agencies in tackling these terrible offences and identify how we will protect victims from further harm. I am grateful to all agencies in their support of this strategy and look forward to working together on its implementation.



Stephen Hughes

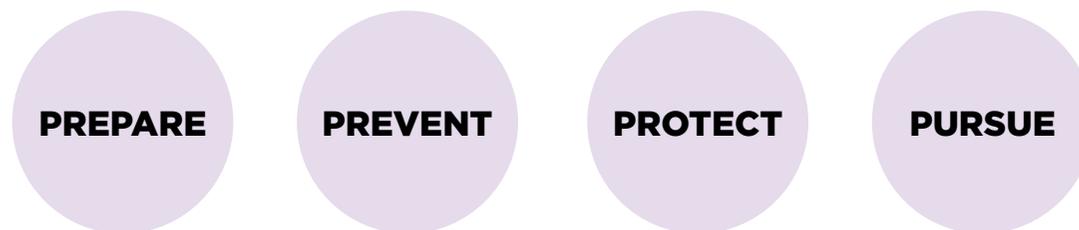
## Executive Summary

**Our vision:** ‘The people of North Wales can live safe, equal and violence-free lives, in communities without abuse or exploitation’.

North Wales is working together to tackle all aspects of Violence Against Women, Domestic Abuse, Sexual Violence, Modern Slavery, Human Trafficking and Exploitation.

The North Wales Vulnerability and Exploitation Board represents all statutory and non-statutory partners across the region, committed to a collaborative, joined-up approach to addressing all areas of vulnerability and exploitation.

The North Wales Vulnerability and Exploitation Strategy 2021-2024 involves a multi-agency approach to addressing vulnerability and exploitation in North Wales. Both Violence Against Women Domestic Abuse and Sexual Violence (VAWDASV) and Modern Slavery agendas are aligned to the four **Strategic Aims**:



The Strategy enables and supports innovative practices and ideas, as well as supporting existing services, to provide a cohesive package of support for victims, survivors and their families. The Strategy also ensures perpetrators are held to account and supports communities to promote an ethos of safety, equality and well-being.

# Our Purpose

The North Wales Vulnerability and Exploitation Partnership Board is a strategic network of agencies aligned across all six Local Authority Areas of North Wales (Anglesey, Gwynedd, Conwy, Denbighshire, Flintshire and Wrexham), comprising statutory, non-statutory and third sector organisations.

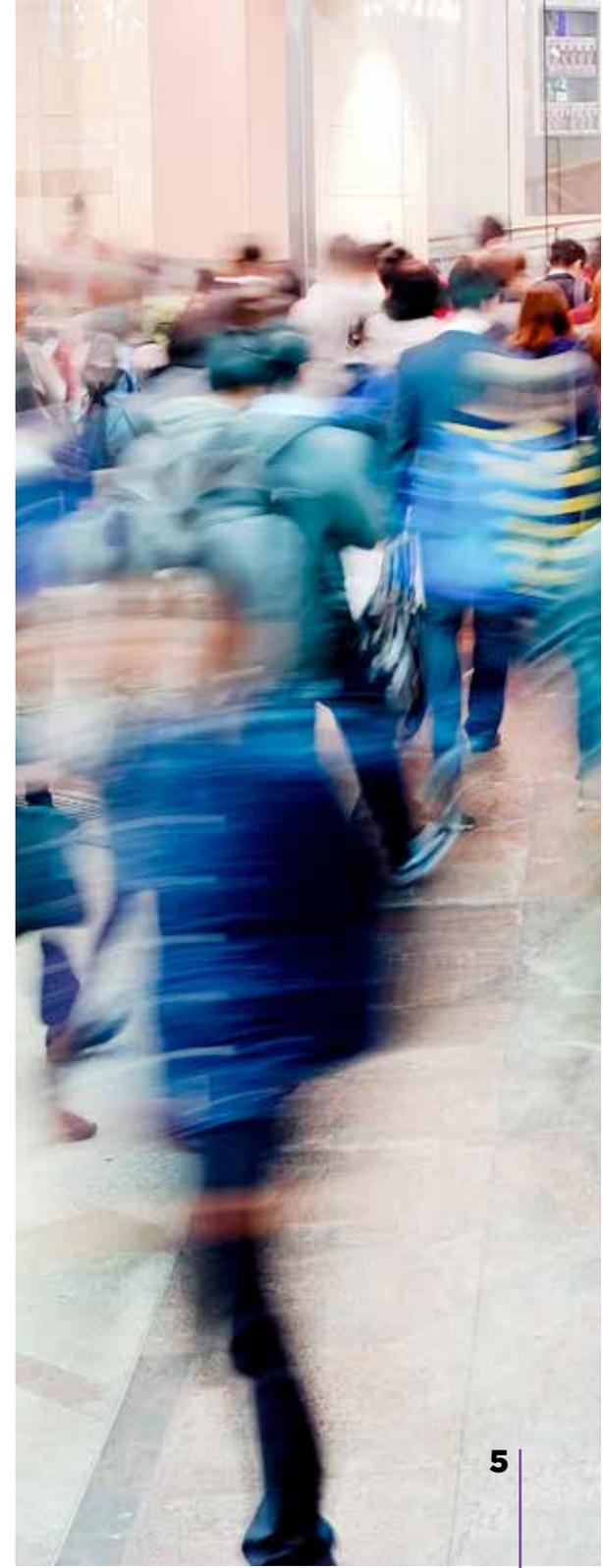
The purpose of the strategic partnership is to generate a coordinated, efficient and productive response to tackle Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) and Modern Slavery, Human Trafficking and Exploitation. We will achieve this by:

- Working collaboratively to ensure that individuals within our communities who may be vulnerable and/or subject to exploitation are identified and heard in order to achieve the best outcome for them.
- Building trust and confidence through working alongside and within our communities.

The Modern Slavery Act 2015 covers a wide range of abuse, including the coercion, control and trafficking of others for the purposes of exploitation, which encompasses sexual exploitation, labour exploitation, criminal exploitation (including 'County Lines' activity), domestic servitude and financial exploitation.

References to 'Modern Slavery' or 'Exploitation' throughout this document will refer to Modern Slavery, Human Trafficking and Exploitation.

Definitions relating to Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) and Modern Slavery, Human Trafficking and Exploitation can be found [here](#).



## **Our Vision**

‘The people of North Wales can live safe, equal and violence-free lives, in communities without fear, abuse or exploitation’.



# Strategic Aims and Objectives

The North Wales Vulnerability and Exploitation Strategy 2021-2024 takes a co-productive approach to addressing vulnerability and exploitation in North Wales. The VAWDASV and Modern Slavery agendas are aligned to the four 'P' Strategic Aims of 'Prepare', 'Prevent', 'Protect' and 'Pursue' with specific strategic objectives attached to each area.

The development of this strategy and associated delivery plan was undertaken in consultation with partner agencies. North Wales has long worked together to tackle all aspects of Violence Against Women, Domestic Abuse and Sexual Violence, based around 6 key objectives, underpinned by the national objectives enshrined in the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. The Modern Slavery Strategy is being delivered in accordance with the Modern Slavery Strategy (Home Office 2015) and, takes cognisance of the Wales Anti-Slavery Leadership Group Strategic Objectives.

All partner agencies conform to the 'Wales Safeguarding Procedures for children and adults at risk of abuse and neglect' Wales Safeguarding Procedures and all Wales Practice Guides. The Procedures help practitioners apply the legislation Social Services and Wellbeing (Wales) Act 2014 and statutory safeguarding guidance Working Together to Safeguard People.

An overarching delivery plan which is both achievable and measurable is essential to successfully achieving strategic aims and objectives. The Delivery Plan sets out the actions to achieve the Strategic Aims and Objectives. These actions will guide partners to share information and intelligence in a timely manner, produce good data reporting and, offer proactive support for victims and witnesses. Such actions will enable statutory, non-statutory and law enforcement agencies to work productively together.

# VAWDASV

 <p><b>PREPARE</b></p>	<p>To support the Partnership and communities to understanding the scope and breadth of the problem, what risk looks like and understand how to increase safety and promote healthy relationships.</p>	<p><b>STRATEGIC OBJECTIVE 1:</b></p>	<p>Increase awareness and challenge attitudes of violence against women, domestic abuse and sexual violence across the North Wales population.</p>
 <p><b>PREVENT</b></p>	<p>Commit to a whole systems approach to prevention. Utilise all available resources to protect victims.</p>	<p><b>STRATEGIC OBJECTIVE 2:</b></p>	<p>Increased awareness in children and young people of the importance of safe, equal and healthy relationships and that abusive behaviour is always wrong.</p>
 <p><b>PROTECT</b></p>	<p>Provide the best possible support, intervention and services to victims, survivors and their families, as well as support to change behaviour of perpetrators where appropriate.</p>	<p><b>STRATEGIC OBJECTIVE 3:</b></p>	<p>Increased focus on holding perpetrators to account and provide opportunities to change their behaviour based around victim safety.</p>
 <p><b>PURSUE</b></p>	<p>Respond to perpetrators, holding them to account through enforcement activities.</p>	<p><b>STRATEGIC OBJECTIVE 4:</b> <b>STRATEGIC OBJECTIVE 5:</b> <b>STRATEGIC OBJECTIVE 6:</b></p>	<p>Make early intervention and prevention a priority.</p> <p>Relevant professionals are trained to provide effective, timely and appropriate responses to victims and survivors.</p> <p>Provide victims with equal access to appropriately resourced, high quality, needs led, strength based, gender responsive services across North Wales.</p>

# Modern Slavery

 <p><b>PREPARE</b></p>	<p>To reduce the harm caused by modern slavery through improved victim identification and enhanced support and protection.</p>	<p><b>STRATEGIC OBJECTIVE:</b></p>	<ol style="list-style-type: none"> <li>1) Victims To fully support victims in each local authority area of North Wales and equip them with the tools they need to make meaningful recoveries.</li> <li>2) Training and Awareness To raise awareness with the public and improve the knowledge and skills of professionals in responding to Modern Slavery</li> </ol>
 <p><b>PREVENT</b></p>	<p>To prevent people from engaging in modern slavery crime.</p>	<p><b>STRATEGIC OBJECTIVE:</b></p>	<ol style="list-style-type: none"> <li>3) Crime Prevention To disrupt organised crime that fits the definition of Modern Slavery under the Modern Slavery Act.</li> </ol>
 <p><b>PROTECT</b></p>	<p>To strengthen safeguards against modern slavery by protecting vulnerable people from exploitation and increasing awareness and resilience against this crime.</p>	<p><b>STRATEGIC OBJECTIVE:</b></p>	<ol style="list-style-type: none"> <li>4) Resilient Communities To increase referrals to the NRM and improve the local response to identifying victims and safeguarding at-risk communities.</li> </ol>
 <p><b>PURSUE</b></p>	<p>To prosecute and disrupt individuals and groups responsible for modern slavery.</p>	<p><b>STRATEGIC OBJECTIVE:</b></p>	<ol style="list-style-type: none"> <li>5) Enforcement Supporting agencies to ensure effective legal powers are utilised and positive-action taken and increasing evidence-led investigations with a view towards Criminal Justice proceedings, where applicable.</li> <li>6) Governance To develop a suitable and effective governance structure that incorporates accountability and performance monitoring.</li> <li>7) Sustainability To ensure the sustainability of our partnership response including continued leadership and shared resources.</li> </ol>

## Governance

The North Wales Vulnerability and Exploitation Partnership Board will be accountable for this strategy. Chaired by the Chief Executive, North Wales Office of the Police and Crime Commissioner, the Strategic Partnership Board provides oversight, direction and support to local partners to ensure a collaborative approach. The Board will meet on a quarterly basis to monitor and evaluate progression towards the Strategic Aims and Objectives as outlined within the Delivery Plan and Actions. Whilst all six Local Authority areas and partner agencies across North Wales will be responsible for setting their own action plans in response to their localities' specific needs, representatives will be encouraged to update and report on their progress and barriers to achieving success, commensurate with the Strategic Delivery Plan.

The Vulnerability and Exploitation Partnership Board Chair will meet with counterparts from the Safer North Wales Partnership Board, Safeguarding Boards (Adults/Children), Contest Board, Justice Board and Regional Leadership Board to ensure alignment of work streams.

### Vulnerability and Exploitation Board Representation and Partners

- Anglesey County Council
- Barnardo's / Independent Child Trafficking Guardians (ICTGs)
- BAWSO
- BCUHB
- Church in Wales
- Conwy County Borough Council
- DASU North Wales
- Denbighshire County Council
- Flintshire County Council
- Gwynedd County Council
- Haven of Light
- HMP Berwyn
- North Wales Police
- North Wales Fire and Rescue Service
- North Wales Youth Justice Service
- Office of Police and Crime Commissioner
- Probation Service
- RASASC Wales
- Regional VAWDASV Team
- Welsh Anti-Slavery Leadership Group
- Wrexham County Borough Council

Separate work streams or Task and Finish Groups involving respective partners may be commissioned in order to deliver upon actions, to achieve the respective strategic aims and objectives. Whilst not an exhaustive list, this may include:

- Aberconwy WA
- Action for Children
- Advance Brighter Futures
- Association of Voluntary Organisations in Wrexham (AVOW)
- Border Force
- Caia Park Partnership
- Clwyd Alyn Housing Association Women's Aid
- Clwyd Alyn Housing Association
- Crown Prosecution Service
- Department Work Pensions
- Ethnic Minorities and Youth Support Team Wales (EYST)
- Family Friends
- Gangmasters and Labour Abuse Authority (GLAA)
- Gorwel
- Hafan Cymru
- HMRC
- Homestart Wrexham
- Lucy Faithful Foundation
- Migrant Help
- Modern Slavery Helpline
- National Crime Agency
- National Ugly Mugs (NUM)
- New Pathways
- NFU
- NSPCC
- North Wales Women's Centre
- PACT
- Polish Integrated Support Centre (PISC)
- Red Cross
- Refugee Council
- Salvation Army
- Stepping Stones
- TGP Cymru
- The Trussell Trust
- Victim Support
- Wales & West Housing Association

## Reporting for members of the public

- Call North Wales Police on **101** or, **999** in an emergency
- Modern Slavery Helpline **08000 121 700**  
[www.modernslaveryhelpline.org/report](http://www.modernslaveryhelpline.org/report)

The Modern Slavery Helpline App makes reporting to the Modern Slavery Helpline even easier. The App provides a simple guide to recognising the signs of modern slavery and reporting concerns in confidence. Search for 'Modern Slavery' or 'Unseen UK' in app stores.

- Live Fear Free Helpline **0808 80 10 800**
- BAWSO Helpline **0800 731 8147**
- Childline **0800 11 11**
- CrimeStoppers **0800 555111**



# Definitions

## VULNERABILITY

A person is vulnerable if as a result of their situation or circumstances, they are unable to take care or protect themselves, or others, from harm or exploitation.

## VIOLENCE AGAINST WOMEN

‘Violence against women’ is defined by the United Nations and others as acts of violence which are suffered disproportionately by women that results in, or is likely to result in, physical, sexual or mental harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life. Violence against women shall be understood to encompass but not be limited to:

- (a) Physical, sexual and psychological violence occurring in the family, including battering, sexual abuse of female children in the household, dowry-related violence, marital rape, female genital mutilation and other traditional practices harmful to women, non-spousal violence and violence related to exploitation;
- (b) Physical, sexual and psychological violence occurring within the general community, including rape, sexual abuse, sexual harassment and intimidation at work, in educational institutions and elsewhere, trafficking in women and forced prostitution;
- (c) Physical, sexual and psychological violence perpetrated or condoned by the State, wherever it occurs.

## DOMESTIC ABUSE

The UK Government definition of domestic abuse is ‘any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.’

## **SEXUAL VIOLENCE**

Sexual violence is any unwanted sexual act or activity. There are many different kinds of sexual violence, including but not restricted to: rape, sexual assault, child sexual abuse, sexual harassment, rape within marriage/relationships, trafficking, sexual exploitation, and ritual abuse.

## **MODERN SLAVERY** (Section 1, Modern Slavery Act 2015)

Modern Slavery encompasses slavery, servitude and forced or compulsory labour. A person commits this offence if they hold another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or they require another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

## **SLAVERY**

The 1926 Slavery Convention defines slavery as ‘the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised’.

## **SERVITUDE**

‘Servitude’ means an obligation to provide a service that is imposed by the use of coercion. Servitude is an ‘aggravated’ form of forced or compulsory labour. The fundamental distinguishing feature between servitude and forced or compulsory labour is in the victim feeling that their condition is permanent and that the situation is unlikely to change.

## **FORCED OR COMPULSORY LABOUR**

The UN Convention No. 29 concerning forced or compulsory labour defines ‘forced or compulsory labour’ as ‘all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily’. ‘Penalty’ may go as far as physical violence or restraint, but it can also take subtler forms of a psychological nature, such as threats to denounce victims to the police or immigration authorities when their employment status is illegal. Consent is a factor in forced and compulsory labour, but a victim may have given consent in a situation where they felt they had no viable alternative, in which case they could still be subject to forced or compulsory labour.



Forced labour is not restricted to a particular sector of the labour market but cases have been identified in manufacturing, food processing, agriculture and hospitality sectors:

### **DOMESTIC SERVITUDE**

In some cases, victims may appear free to move and leave the house of their own free will. However, they may not have meaningful freedom of movement due to, for example, a lack of bank account, finances or identity documents which means they must return to their employer.

### **HUMAN TRAFFICKING (Section 2, Modern Slavery Act 2015)**

A person commits this offence if they arrange or facilitate the travel of another person with a view to that person being **exploited**. It is irrelevant whether the person, adult or child, consents to the travel.

## **EXPLOITATION** (Section 3, Modern Slavery Act 2015)

To be a victim, someone must have been trafficked for the purpose of ‘exploitation’ which may take the form of either:

Slavery, servitude and forced or compulsory labour (see definitions above); sexual exploitation; securing services etc by force, threats or deception; securing services etc from children and vulnerable persons.

## **SEXUAL EXPLOITATION**

(a) which involves the commission of an offence under

(i) section 1(1)(a) of the Protection of Children Act 1978 (indecent photographs of children), or

(ii) Part 1 of the Sexual Offences Act 2003 (sexual offences), as it has effect in England and Wales, or

(b) which would involve the commission of such an offence if it were done in England and Wales.

**CHILD SEXUAL EXPLOITATION** is defined in the ‘Child Sexual Exploitation: Definition and Guide for Practitioners’ which states:

*‘Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.’* (Department for Education, 2017).

**COUNTY LINES** is defined in the ‘Serious Violence Strategy’ which states:

*‘County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move [and store] the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.’* (Home Office, 2018).

## **FORCED CRIMINALITY**

Forced Criminality can include:-

- pick-pocketing
- shop-lifting
- drug trafficking or cultivation

## **CHILD CRIMINAL EXPLOITATION**

Child Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology’ (Home Office, 2018).



## **FINANCIAL EXPLOITATION**

Refers to illegal or improper use of a person's funds, property, or assets by a trusted person or entity. This frequently occurs without the explicit knowledge or consent of a senior or disabled adult. Assets are commonly taken via forms of deception, coercion, harassment, duress and threats.

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**MISSING PERSON** is defined as 'Anyone whose whereabouts cannot be established will be considered as missing until located and their wellbeing or otherwise confirmed.'

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