

Mr Owen Sheppard

Royal Borough Kensington and Chelsea
Town Hall
Hornton Street
W8 7NX

FOI Reference: 3859997
Email: foi@rbkc.gov.uk
Date: 22 September 2020

Dear Mr Sheppard

Freedom of Information Act 2000

Thank you for your recent request to the Council. You asked to be provided with the following information:

I am writing under the Freedom of Information Act requesting information on modern slavery referrals made by the council to the National Referral Mechanism (NRM) from 2014 to 2019 and including 2020 so far.

I would like this information broken down year by year, and the ages and nationalities of each person provided and their location (using the first part of a postcode) where possible. If this is not possible please at least provide ages to distinguish between child and adult victims.

Please can you give as much detail about each case for the youngest five victims including work and living conditions, whether trafficking was involved, the circumstances of discovery and location. Please also do the same for the oldest five victims. If there are circumstantial pictures relating to these cases that you can let us have that would also be good.

If cases of modern slavery were detected by the council but were not referred to the NRM, please also give these figures year by year with some explanation as to why their cases were not referred to NRM. Again please provide fuller case details for the five oldest and youngest of these cases.

Response

This request is being handled under the Freedom of Information Act 2000.

FOI	RBKC
Modern slavery referrals made by the council to the National Referral Mechanism (NRM) from 2014 to 2019 and including 2020 so far.	<p>2014/2015 – unable to provide information on adult referrals as it was not recorded centrally at this time</p> <p>2014-2017 the information on children referrals is held but it is not a statutory requirement to report on this information.</p> <p>As this information is not recorded in a reportable format Kensington and Chelsea Children's services would need to review 8,000 children's case files for the period of 2014-2018 to retrieve the requested information. It is estimated that it will take an officer a minimum of 20 minutes to review each case to establish the extent to which the requested information is held, retrieve and extract it. It is estimated that it would take at least 2666 hours to comply with your request.</p> <p>Therefore, we are unable to process your request. This is because the cost of locating and retrieving the information exceeds the "appropriate limit" as stated in the Freedom of Information (Fees and Appropriate Limit) Regulations 2004.</p> <p>In accordance with Section 17 of the Freedom of Information Act 2000 this letter acts as a Refusal Notice.</p> <p>2016 – 0 referrals 2017 – < 5 referrals 2018 – 6 referrals 2019 – 9 referrals 2020 (until March) – < 5 referrals</p> <p>(*) the above data does not distinguish child and adult referrals due too low numbers.</p>
The information broken down year by year, and the ages and nationalities of each person provided and their location (using	Some figures and further information concerning age, nationality and location have been withheld to avoid the risk of individual identification. The Council considers that this information is exempt under Freedom of

<p>the first part of a postcode) where possible. If this is not possible please at least provide ages to distinguish between child and adult victims.</p>	<p>Information Act 2000, Section 40(2) (personal information) as disclosure of this level of detail could lead to the identification of individuals, which would be in breach of the Data Protection Act 2018.</p> <p>This is intended to ensure that public authorities take into account the additional information that a member of the public might have (information on the Web or in news reports, public libraries, court records etc.) that could allow data to be combined to produce information that relates to and identifies a particular individual - and that is therefore personal data.</p> <p>Low statistical values increase the likelihood of seemingly anonymised information being combined with other information to identify an individual.</p> <p>In accordance with Section 17 of the Freedom of Information Act 2000 this letter acts as a Refusal Notice.</p>
<p>Please can you give as much detail about each case for the youngest five victims including work and living conditions, whether trafficking was involved, the circumstances of discovery and location. Please also do the same for the oldest five victims. If there are circumstantial pictures relating to these cases that you can let us have that would also be good.</p>	<p>The youngest child was 14 years old and all child referrals were for criminal exploitation.</p> <p>Adult referrals included domestic servitude, forced labour and sexual exploitation.</p> <p>We are unable to provide remaining information requested as the number of referrals is too low and risks identifying individuals. The Council considers that this information is exempt under Freedom of Information Act 2000, Section 40(2) (personal information) as disclosure of this level of detail could lead to the identification of individuals, which would be in breach of the Data Protection Act 2018.</p> <p>This is intended to ensure that public authorities take into account the additional information that a member of the public might have (information on the Web or in news reports, public libraries, court records etc.) that could allow data to be combined to produce information that relates to and identifies a</p>

	<p>particular individual - and that is therefore personal data.</p> <p>Low statistical values increase the likelihood of seemingly anonymised information being combined with other information to identify an individual.</p> <p>In accordance with Section 17 of the Freedom of Information Act 2000 this letter acts as a Refusal Notice.</p>
<p>If cases of modern slavery were detected by the council but were not referred to the NRM, please also give these figures year by year with some explanation as to why their cases were not referred to NRM. Again please provide fuller case details for the five oldest and youngest of these cases.</p>	<p>All child cases of modern slavery were referred to the National Referral Mechanism. In 2019 a MS1 form was completed for an adult victim of sexual exploitation who did not wish to enter the NRM.</p> <p>We are unable to provide remaining information requested as the number of referrals is too low. The Council considers that this information is exempt under Freedom of Information Act 2000, Section 40(2) (personal information) as disclosure of this level of detail could lead to the identification of individuals, which would be in breach of the Data Protection Act 2018.</p> <p>This is intended to ensure that public authorities take into account the additional information that a member of the public might have (information on the Web or in news reports, public libraries, court records etc.) that could allow data to be combined to produce information that relates to and identifies a particular individual - and that is therefore personal data.</p> <p>Low statistical values increase the likelihood of seemingly anonymised information being combined with other information to identify an individual.</p> <p>In accordance with Section 17 of the Freedom of Information Act 2000 this letter acts as a Refusal Notice.</p>

Please quote the reference number 3859997 in any future communications.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your original letter and should be addressed to:

Information Management Team
The Royal Borough of Kensington and Chelsea
The Town Hall, Hornton Street, London W8 7NX
Email: xxx@xxxx.xxv.uk

If you are still dissatisfied with the Council's response after the internal review you have a right of appeal to the Information Commissioner at:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Telephone: 0303 123 1113
Website: www.ico.org.uk

I will now close your request as of this date.

Yours sincerely

Information Management Team