

From: [PMO](#)
To: [Wylfa Newydd](#)
Subject: RE: IACC Deadline 2 Submission : Local Impact Report - Safeguarding (email 8)
Date: 04 December 2018 20:33:35
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Please note, a number of emails will follow in relation to the LIR – we will confirm the final e-mail.

Pnawn Da/ Good afternoon,

Gweler ynghlwm cynrychiolaeth CSYM mewn perthynas â'r uchod / *Please see IACC's representation in respect of the above.*

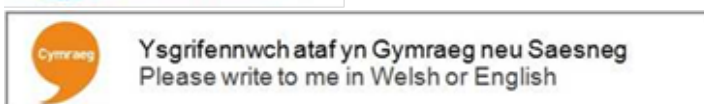
Bydd fersiwn Gymraeg yn cael ei ddarparu cyn gynted a phosib / *A Welsh version of the submission will be provided in due course.*

Cofion/ Regards,
Manon

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Mae'r neges e-bost hon a'r ffeiliau a drosglwyddyd ynghlwm gyda hi yn gyfrinachol ac efallai bod breintiau cyfreithiol ynghlwm wrthynt. Yr unig berson sydd i'r hawl i'w darllen, eu copio a'u defnyddio yw'r person y bwriadwyd eu gyrru nhw ato. Petaech wedi derbyn y neges e-bost hon mewn camgymeriad yna, os gwelwch yn dda, rhowch wybod i'r Rheolwr Systemau yn syth gan ddefnyddio'r manylion isod, a pheidiwch datgelu na chopio'r cynnwys i neb arall.

Mae cynnwys y neges e-bost hon yn cynrychioli sylwadau'r gyrrwr yn unig ac nid o angenrheidrwydd yn cynrychioli sylwadau Cyngor Sir Ynys Môn. Mae Cyngor Sir

Ynys Mon yn cadw a diogelu ei hawliau i fonitro yr holl negeseuon e-bost trwy ei rwydweithiau mewnol ac allanol.

Croeso i chi ddelio gyda'r Cyngor yn Gymraeg neu'n Saesneg. Cewch yr un safon o wasanaeth yn y ddwy iaith.

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THE ISLE OF Anglesey

Wylfa Newydd Local Impact Report

Chapter 6: Safeguarding

December 2018

PINS Ref: EN010007



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1.0 Safeguarding

1.1 Overview of Impacts

- 1.1.1 The IACC has prepared this chapter from the point of view of safeguarding local children, young people and vulnerable adults, taking into account potential risks associated with having a substantial migratory workforce coming to the island. Horizon's workforce management strategy submitted as part of the Development Consent Order process¹ states that:

"Horizon Nuclear Power ("Horizon") estimates that at the peak of the construction phase, it will need around 8,500 workers to build the Wylfa Newydd DCO Project ("the Project"). Whilst the central estimate for the size of the workforce is 8,500, this strategy (consistent with the Environmental Impact Assessment) is based on 9,000 construction workers at peak. This allows for a higher number of workers overall or amongst those seeking temporary accommodation."

- 1.1.2 There will be a degree of labour force turnover across the 10 year duration of the construction project, meaning that there could be up to 40,000 different individuals working on the project at one time or another².

- 1.1.3 The proposals to house these workers now comprise of:

- a) Provision of up to 4,000 bed spaces on the Site Campus (a purpose built Temporary Workers' Accommodation within the Wylfa Newydd Development Area (WNDA)).
- b) A central case that relies on use of 3,000 bed spaces in existing accommodation across Anglesey and parts of the mainland.
- c) 2,000 workers will be recruited from existing residents recruited locally who will not therefore need temporary accommodation.

- 1.1.3 Therefore, of the 9,000 workers predicted at any one time for assessment purposes, potentially 7,000 construction workers will be non-home based."

- 1.1.4 There is no suggestion that the Wylfa Newydd workforce or that associated with its supply chain will be anything other than largely decent and law-abiding. However, inevitably, with a workforce and that size there will be contained within it an element that present some risk to those on the island who are already vulnerable. The presence of that workforce may also attract elements that are more of a risk to the local population. **This risk will be potentially be significantly greater and more concentrated in the North of the Island** (proximity principle) based upon the assumption that workers will try and reside as close as possible to site - which would be in addition to the Construction Workers Accommodation Site Campus (according to Horizon Gravity Model there will be 1,024 workers living in private accommodation which would be in addition to the 4,000 workers on the site campus).

¹ Examination Library reference APP-[413]

² Examination Library reference APP-[411]

- 1.1.5 In their Accommodation Strategy³ Horizon identify that the central estimate for the size of the workforce is 8,500, of whom they hope 2,000 workers will be recruited from existing local residents. **The transient workforce is likely to be roughly half the size of the population of Holyhead, the largest town on the Isle of Anglesey.** It is also expected that this workforce will be predominately (but not exclusively) male, with relatively few families expected to accompany the workforce (an expected 225 dependents, but this figure is not accepted as robust and high enough by the IACC).
- 1.1.6 There is also a likelihood that the presence of that additional and transient workforce could lead to an increase in that vulnerable population, as additional people are attracted to the island and/or subject to human trafficking and/or modern slavery.
- 1.1.7 Information from the ONS (reported in Construction News)⁴ identifies that 88% of the UK construction workforce is men. More informal estimates of the on-site workforce⁵ suggest that some 99% are men.
- 1.1.8 Horizon have proposed a Worker Management Strategy and a Code of Conduct to try and ensure that worker behaviours are within the law. The IACC is, however, of the opinion that these measures alone would not be sufficient to prevent potential Safeguarding issues from occurring during the construction phase of the project and highlight the following Safeguarding areas that may be impacted upon due to the significant population increase:
- a) Supporting Children and Young People
 - b) Safeguarding Children and Young People
 - c) Child Sexual Exploitation
 - d) Safeguarding Older People
 - e) Safeguarding Adults at Risk
 - f) Illegal Drug Use
 - g) Trafficking and/or Modern Slavery
 - h) Violence against Women, Domestic Abuse, Sexual Violence
 - i) Prevent

2.0 Context

Introduction

2.1.1 This chapter focuses upon the safeguarding implications for children, young people and adults who are *“at risk”, and in need of safeguarding*, of the proposed project particularly in the construction phase.

2.1.2 The context for it is the statutory requirements with regard to safeguarding and also the current position in Anglesey with regard to safeguarding and the local population.

³ Examination Library reference APP-[412]

⁴ ‘Women in construction: what do the numbers say’; Construction News, March 2017 ([Link](#))

⁵ ‘Where are all the women? Why 99% of construction site workers are male’ The Guardian May 2015 ([Link](#))

2.1.3 The following draft DCO papers have been reviewed, along with other relevant local and national materials:

- a) 8.19 Health Impact Assessment
- b) 8.22 Equality Impact Report
- c) 8.23 Community Impact Report
- d) 8.5 Workforce Management Strategy
- e) 6.3.10 Project Wide Effects – Community Cohesion Report
- f) 6.1.2 Introduction to the project

2.1.4 They show that so far, safeguarding as an issue has not been addressed by Horizon in any significant way.

2.1.5 Safeguarding and promoting the welfare of children is defined by Working Together to Safeguard People Volume 5 – Handling Individual Cases to Protect Children at Risk (Statutory Guidance WG) as:

- a) Protecting children from maltreatment
- b) Preventing impairment of children health or development
- c) Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- d) Taking action to enable all children to have the best outcomes

2.1.6 Safeguarding children powers and duties in Anglesey are determined by a combination of UK and Welsh legislation.

2.1.7 The NSPCC guide on '*Child protection in Wales, Legislation, policy and guidance*⁶ identifies 10 different pieces of legislation that are relevant to safeguarding children in Wales:

2.1.8 Of these the three most significant are:

- a) Children Act 1989
- b) Social Services and Well-being (Wales) Act 2014
- c) Well-being of Future Generations (Wales) Act 2015

2.1.9 Safeguarding adults in Wales is again covered by the *Social Services and Well-being (Wales) Act 2014* and the accompanying guidance⁷. Of particular relevance is '*Working Together to Safeguard People: Volume 6 – Handling Individual Cases to Protect Adults at Risk*'.

2.1.10 Both Volume 5 and Volume 6 (and other volumes of statutory guidance relevant to this area are issued under regulations relevant to Part 7 of the Social Services and Well-being (Wales) Act 2014.

⁶ NSPCC, 'Child protection in Wales: Legislation, policy and guidance' ([Link](#))

⁷ *Social Services and Well-being (Wales) Act 2014* and the accompanying guidance ([Link](#))

Population in Anglesey

2.1.11 The Isle of Anglesey has a population of around 70,000, with the majority of the population describing themselves as white. The population is primarily an ageing population with the third highest percentage of people aged over 65 in Wales, and a lower percentage of people aged under 16 than Wales as a whole. Anglesey continues to be an area in Wales with a strong Welsh language presence. There are 44 Lower Super Output Area (LSOAs) on the Island: which is 2.3% of all the LSOAs in Wales. Morawelon, in the Holyhead area is one of the LSOAs ranked within the 10% most deprived LSOSs in Wales: with Holyhead Town and London Road, again in the Holyhead area, ranked within the 11% - 20% most deprived LSOAs in Wales.

Child Population in Anglesey

2.1.12 The North Wales Population Needs Assessment⁸ was compiled in 2017. The population of the Isle of Anglesey is projected to decrease steadily between now and 2039. The more detailed projections done by the Welsh Government⁹ indicate that in essence the children and young people numbers are going to fall slightly, working age numbers are going to fall considerably, and the older population is going to grow.

Children Looked After in Anglesey

2.1.13 The number of children and young people looked after by IACC has increased significantly in recent years.

Table 1 - Number of Children Looked After in Anglesey, 2015-18

	March 2016	March 2017	March 2018
Looked After Children	112	142	145

2.1.14 In 2016 a further 60 children from outside Anglesey were being looked after within the County in a variety of settings.

Children and young People involved in crime in Anglesey

2.1.15 The police and youth offending services in Wales increasingly seek to deal informally with minor offending by children and focus upon diversion from the youth justice system. In Anglesey and Gwynedd (the data for the two are collected together):

- First-Time Entrants (FTEs) since 2013-14 have reduced from 89 per annum to 37 in 2017-18 (-58%)
- In 2010-11 the number of young people worked with by the Youth Justice service was 387, in 2017-18 this number was 172 a 55% reduction

⁸ 'The North Wales population assessment' ([Link](#))

⁹ 'Local Authority Population Projections for Wales (2014-based): Principal projection' ([Link](#))

2.1.16 Between 2013/14 and 2015/16, however, the number of children and young people who were victims of crime also rose sharply, again from around 200 to around 300 per annum.¹⁰

Children with Disabilities in Anglesey

2.1.17 In 2015, the number of known children with a disability in Anglesey stood at 75, having fallen sharply in the years prior to that. This is like to be reflective of changes in recording and practice rather than actual changes in numbers. Children and young people with disabilities are at greater risk of abuse than other children and young people.

Teenage Pregnancies in Anglesey

2.1.18 The Population Needs Assessment points out the parenting ability of teenage parents can be affected by several factors including conflict within family or with a partner, social exclusion, low self- confidence and self-esteem. These factors can affect the mental wellbeing of the young person. The impact of being a teenage parent will be evident on both the mother and father and while the mother will be under 20 years of age many fathers will be between 20 and 24 years. In the first half of the decade the number of teenage pregnancies in Anglesey dropped from 65 (2010) down to 36 (2014). In terms of the teenage pregnancy rate it fell from 42/1000 females aged under 18 in 2008 down to 22/1000 in 2016.

People in Anglesey

2.1.19 The adult population in Anglesey has shown some marked changes over the last 15 years, particularly with regard to older people. The numbers of older people are set to continue to increase over the next 10-20 years, as shown by Table 2, below.

Table 2 - Number of people in Anglesey aged over 65

Year	2014	2019	2024	2029	2034	2039
Number	17,000	18,000	20,000	21,000	22,000	23,000

2.1.20 Loneliness and isolation can contribute to the potential vulnerability of this section of the population.

People with Learning Disabilities in Anglesey

2.1.21 In Anglesey there are approximately 300 adults with a learning disability known to the IACC. However, The British Institute of Learning Disabilities (BILD) estimate¹¹ that the actual number of people with learning disabilities in a population may be up to four times as large as the number known to services. It is likely that this wider group has more moderate learning disabilities, but they will, nevertheless still be potentially at risk of abuse.

¹⁰ Population Needs Assessment (ibid)

¹¹ 'Need to know facts or figures about learning disabilities?', BILD [\(Link\)](#)

2.1.22 Current projections estimate that the total number of people with a learning disability needing support will increase 2% each year until 2020 and will then stabilise (Local Government Association, 2007)¹². However, other estimates suggest that the increase could be up to 8% per annum, especially for the wider group referred to above.¹³

People with physical disabilities or limiting long-term conditions in Anglesey

2.1.23 Some 2,000 people are registered with the IACC as having a physical disability. There are some 1,300 people in Anglesey with impaired vision, 200 of whom have severe sight impairment. There are around 10,000 people in Anglesey with a limiting long-term condition, and this is likely to increase over the next 20 years as the older population increases.

Safeguarding Children and Young People and Their Families - Activity in Anglesey

2.1.24 Anglesey is a relatively small authority in terms of population, and that is reflected in the figures available from StatsWales concerning safeguarding children.

2.1.25 The relatively small numbers mean that individual/small changes can impact disproportionately on both the statistical and required resource change. For example the number of children on the Child Protection register can increase significantly with the addition of a single large family's children being put onto the register. Also, children often come off the register if they become children looked after by the local authority. Therefore whilst they are no longer on the register the work and the resource impacts continue and increase.

Table 3 – Children on Child Protection Register – Anglesey

	March 2016	March 2017	March 2018
Reason for Registration			
Neglect	41	28	13
Emotional	23	26	11
Physical	41	32	13
Physical & Sexual	0	0	3
Physical & Neglect	6	7	0
Physical & Emotional	0	0	1
Neglect & Sexual	0	0	0
Neglect and Emotional	0	0	4
Sexual	13	8	1
No Category given	0	0	0
Other Local Authority	0	0	0
Total Children on the Register	124	101	46

¹² 'North Wales population assessment', North Wales Social care and Well-being collaborative, 2017, ([Link](#))

¹³ ibid

2.1.26 As table 3 shows, the figures do fluctuate from year to year and currently are much more in line with the All-Wales average.

2.1.27 Whilst these figures are limited in scope they do give an indication as to the actual numbers of children and young people who are in need of safeguarding for reasons of abuse.

Child Sexual Exploitation in Anglesey

2.1.28 Child Sexual Exploitation (CSE) has been a priority area for the Regional Safeguarding Children Board and there is a multi-agency Anglesey Missing and CSE Panel.

2.1.29 In November 2017 the Welsh Government published a Review of the Wales Safeguarding Children and Young People from Sexual Exploitation (CSE) Statutory Guidance.¹⁴ The review identified the Welsh definition of CSE as:

2.1.30 *“Child sexual exploitation is the coercion or manipulation of children and young people into taking part in sexual activities. It is a form of sexual abuse involving an exchange of some form of payment which can include money, mobile phones and other items, drugs, alcohol, a place to stay, ‘protection’ or affection. The vulnerability of the young person and grooming process employed by perpetrators renders them powerless to recognise the exploitative nature of relationships and unable to give informed consent (WAG 2009:3).”*

2.1.31 Wales has a Sexual Exploitation Risk Assessment Framework (SERAF) that operates on the basis of identifying established vulnerability and risk factors which correlate to a risk score that determines the risk category and its associated child protection action, although a recent review identified that the current guidance and SERAF protocol are no longer fit for purpose.

2.1.32 In England the Office of the Children’s Commissioner published the report *“If only someone had listened”* - The Office of the Children’s Commissioner’s Inquiry into Child Sexual Exploitation in Gangs and Groups¹⁵ The report identified nine significant failings in the current response to tackling and addressing child sexual exploitation:

- a) Many agencies are forgetting the child.
- b) Services are failing to engage with children and young people.
- c) There is a lack of leadership amongst some of the most senior decision makers at local level, Professionals are failing to recognise victims.
- d) Too many areas are still working in isolation to tackle CSE.
- e) A delayed response to CSE continues to hamper the development and improvement of practice to tackle CSE.
- f) Results are not being monitored.

¹⁴ ‘A Review of the Wales Safeguarding Children and Young People from Sexual Exploitation (CSE) Statutory Guidance’, Welsh Government November 2017 ([Link](#))

¹⁵ *“If only someone had listened”* - Office of the Children’s Commissioner’s Inquiry into Child Sexual Exploitation in Gangs and Groups, Final Report November 2013 ([Link](#))

2.1.33 The sexual exploitation of children is an issue closely linked to those of human trafficking and modern slavery covered below, in that all can be connected to the sex industry and harmful to those caught up by them. Significant numbers of children trafficked into the UK may be forced into the sex trade at some point.

Safeguarding Adults – Activity in Anglesey

2.1.34 Information about adult safeguarding activity in Anglesey is available from StatsWales and is set out in tables 4 and 5, below. Again, the numbers below are lower than for other Welsh authorities. Nevertheless, the numbers that require an initial investigation are significant, and it is noticeable that a high proportion proceeded to further enquiry and most of those required further action by the local authority. Also, it is noticeable that of those investigations that were concluded during the year, 20% also involved a criminal investigation.

Table 4 - Adult Safeguarding data for Anglesey 2016/17¹⁶

Adults suspected of being at risk by local authority	166
Adults suspected of being abused more than once	28
Number of reports of an adult suspected of being at risk received during the year	190
Number of reports of an adult suspected of being at risk received during the year that proceeded to further enquiry.	169
Number of enquiries during the year that concluded that action was required by local authority	148
Number of adults who refused to participate in action identified by an enquiry by local authority	8
Number of investigations that concluded during the year by local authority	75 (15 Criminal)

Table 5 - Breakdown of types of alleged abuse 2016/17

Type of abuse	Aged 18 and over	Aged 65 and over	Total
Physical	11	42	53
Sexual	5	12	17
Emotional/Psychological	16	31	47
Financial	15	30	45
Neglect	12	48	60
Total	59	160	219
Of which: domestic	17	60	77

Human Trafficking/Modern Slavery in Anglesey

2.1.35 Modern slavery is closely associated with both human trafficking and sexual exploitation, and all three can involve both children and adults.

2.1.36 The strong links between trafficking, modern slavery and the sex trade are emphasised in the report of Inquiry by the All-Party Parliamentary Group on

¹⁶ 'Adult Safeguarding returns', StatsWales ([Link](#))

Prostitution and the Global Sex Trade: *Behind Closed Doors: Organised sexual exploitation in England and Wales*.¹⁷

2.1.37 The All Wales Practice Guidance for Safeguarding Children Who May Have Been Trafficked¹⁸ identifies that there are a wide range of services that have a specific role in this area. For Children's Services it identifies that their responsibilities (as a First Responder organisation) towards child victims of trafficking may include:

- a) Identifying a LA lead for trafficking.
- b) Identifying victims/potential victims according to agreed profiles or receiving referrals from other agencies who have identified them.
- c) Contributing to joint inter-agency profiling of victims/potential victims.
- d) Undertaking initial interviews, including joint interviews with local police, to assess risk, harm and agreed child protection plans.
- e) Providing victims/potential victims with a place of safety, including accommodation by the LA.
- f) Providing support services (e.g. legal advice, counselling).
- g) Monitoring of Looked After Children for signs that they are meeting the traffickers, which may include monitoring phone calls and providing a supportive environment so that the child does not leave with the trafficker. This may necessitate taking legal steps to ensure the protection of the child.
- h) Working with a specialist agency, such as the British Red Cross or NSPCC, in the finding of relatives in country of origin, and verifying what would be in the best interests of the child, and whether they should be able to remain in the UK or if it is safe to return home.
- i) Ensuring that voluntary organisations or other support services are available if they are returned to their country of origin.
- j) Providing advice on whom to contact concerning their immigration status.
- k) Assisting in the identification of possible traffickers masquerading as relatives.
- l) Ensuring contact with the police and providing information to the police.

2.1.38 There is a similar duty on the Local Authority in terms of adults who are or may be at risk of modern slavery/trafficking.

2.1.39 Holyhead is a major UK port and there have been a number of recent news reports identifying Holyhead as entry point for people who are being trafficked¹⁹,²⁰. Significant Police and other resources have been allocated to respond to this issue, which is recognised by them as a priority.

2.1.40 The Independent Anti-Slavery Commissioner has reported²¹ that for the first time since records began, the top nationality of victims of modern slavery in the

¹⁷ Inquiry by the All-Party Parliamentary Group on Prostitution and the Global Sex Trade: *Behind Closed Doors: Organised sexual exploitation in England and Wales*, 2018 ([Link](#))

¹⁸ *All Wales Practice Guidance for Safeguarding Children Who May Have Been Trafficked*, Welsh Government, 2008 ([Link](#))

¹⁹ North Wales Police boss wants new law to beat slavery ([Link](#))

²⁰ The Vietnamese gang at the centre of a plot to try and smuggle people through North Wales ([Link](#))

²¹ Top nationality of slavery victims in UK: British On the website of the Independent Commissioner ([Link](#))

UK is British. However, 85% of referrals through the national referral mechanism are still for overseas nationals, many of whom have been trafficked. Modern slavery is an umbrella term that covers the offences of human trafficking and slavery, servitude and forced or compulsory labour. Protecting children from criminal exploitation, human trafficking and modern slavery is high on the Government's agenda and a recent report carried out in 2018 has been published to address lessons learnt from the past.²² It is a highly complex and hidden crime which makes it challenging to accurately measure its prevalence. The North Wales Police website²³ identifies that modern slavery is the second most profitable crime in the world, second only to drugs, and that victims of this crime may be:

- a) Forced to work, often in unpleasant conditions, for little or no pay.
- b) Controlled by an 'employer', who uses abuse, or threats of abuse.
- c) Treated as an object or possession, bought and sold like property.
- d) Restricted in what they can do, where they can go, who they can talk to and such.

2.1.41 The most robust current estimate of the scale of modern slavery in the UK was produced by the Home Office in 2014, which estimated that there were between 10,000 and 13,000 potential victims of modern slavery in the UK in 2013.²⁴

2.1.42 The Global Slavery Index (GSI)²⁵ estimates that there were 136,000 people living in modern slavery in the United Kingdom (UK) on any given day in 2016, reflecting a prevalence rate of 2.1 victims for every thousand people in the country. According to the GSI²⁶ *"the UK National Crime Agency (NCA) has found this to be only the "tip of the iceberg" and indicated that the true numbers are likely to be substantially higher – in the tens of thousands – as many victims are unable or reluctant to report to authorities or may not be recognised as victims of modern slavery even if they do report."*

2.1.43 The UK Crime Agency has produced figures for the numbers of people referred from Wales through the National Referral Mechanism²⁷:-

- a) In 2016, there were 3,804 potential victims referred through the National Referral Mechanism (a 16% increase from 2015), of which around a third (1,277) were children. Some 3-4% of the total UK referrals have been made in Wales.
- b) In 2017 there were 193 referrals of potential victims (PV) where the referral was subsequently sent to a police force for crime recording considerations in Wales; this represents a 57% increase on 2016 referral totals and 3.7% of all UK referrals to the NRM. The 193 referrals were comprised of 106 females (55%) and 87 males (45%). There were 109 (56%) individuals

²² Protecting children from criminal exploitation, human trafficking and modern slavery: an addendum (Annex 6A)

²³ 'Modern Slavery' North West Wales Police website ([Link](#))

²⁴ '2017 UK Annual Report on 2015 Report of the Modern Slavery', Home Office, ([Link](#))

²⁵ '018 Country Studies Findings United Kingdom' Global Slavery Index ([Link](#))

²⁶ GSI, ibid

²⁷ 'National Referral Mechanism Statistics –End of Year Summary 2017', NCA, 2018, ([Link](#))

referred for adult exploitation categories and 84 (44%) referred for exploitation as a minor.

Table 6 - Claimed Exploitation Type of Potential Trafficked victims referred to Police Forces in Wales 2017

Claimed Exploitation Type	Female	Male	Total
Adult - Domestic Servitude	8	2	10
Adult - Labour Exploitation	8	43	51
Adult - Sexual Exploitation	36	2	38
Adult - Unknown Exploitation	8	2	10
Minor - Domestic Servitude	0	1	1
Minor - Labour Exploitation	3	25	28
Minor - Sexual Exploitation	37	5	42
Minor - Unknown Exploitation	6	7	13
Total	106	86	193

2.1.44 What is clear is that females (whether women or girls) predominate in the area of sexual exploitation whilst males (men or boys) predominate in the area of labour exploitation.

2.1.45 The North Wales Anti-Modern Slavery Partnership has been established. Its aim is to deliver The Wales Anti-Slavery Leadership Group Delivery Plan,²⁸ that sets out the response to the Welsh Government aim to *“make Wales hostile to slavery and provide the best possible support to survivors”*.

2.1.46 In the Partnership reported the following figures and identified that there is much more awareness and referral of potential cases of Modern Slavery.

Table 7 - Referral of potential cases of Modern Slavery in North Wales 2017

<u>North Wales 2017</u>			
<u>Children (Barnardo's)</u>		<u>NRM (The Police)</u>	
Conwy	5	Q1	3
Denbighshire	6	Q2	3
Flint	6	Q3	7
Gwynedd	2	Q4	8
Anglesey	4		
Wrexham	14		
	37		21

2.1.47 The same GSI report as above also states that: “Of those 5,145 potential victims identified through the NRM in 2017, 46 percent (2,352 cases) were victims of labour exploitation.” Forced labour in the UK may be found across various sectors, including shellfish and food packaging, car washes, nail bars, driveway and block paving, construction, agriculture, and food processing. There is evidence that the incidence of modern slavery, or elements of it, is widespread

²⁸ ‘The Wales Anti-Slavery Leadership Group Delivery Plan’ ([Link](#))

in the construction industry, worldwide. The recent report from the Chartered Institute of Builders (CIOB)²⁹ states that:

2.1.48 *'The dark side (of construction)...is the systematic exploitation of millions of vulnerable migrants - is rarely acknowledged, even by the clients and multinationals that commission and create our shiny new cities.'*³⁰

2.1.49 Whilst the CIOB report focuses upon a major development in the UAE, it highlights the dangers of modern slavery in the construction industry across the globe and in construction projects large and small.

2.1.50 In addition to those people who might be trafficked into modern slavery in the sex industry, this means there may also be 'displacement', where people held in modern slavery are carrying out jobs previously undertaken by members of the resident workforce who move into the Wylfa Newydd project. This could include work in the social care sector.

2.1.51 In 2017 the NRM statistics³¹ reported that 34 percent (1,744 cases) of all referrals made in 2017 were cases of sexual exploitation. Of those total cases of sexual exploitation, 559 cases concerned children. The GSI³² reported that "foreign victims are generally trafficked to the UK, lured by false promises of jobs, but are then forced to work in the sex industry. British and foreign children are groomed by groups of adult males or 'county line' gangs and given drugs before being forced into sexual exploitation."

Violence against Women, Domestic Abuse, Sexual Violence in Anglesey

2.1.52 The latest figures available from the National Crime Statistics³³ for Wales and North Wales are set out in Table 8, below.

Table 8 – Incidence of Domestic Abuse and Violence in Wales and North Wales, 2016/17

Area	Total number of domestic abuse offences	Percentage of all offences that were domestic abuse-related
Wales	27,972	14%
North Wales	5,763	14%
South Wales	14,348	14%

2.1.53 Domestic Abuse and violence is a top priority for the Police and Crime Commissioner for North Wales. In his update for the Police and Crime Panel in September 2017 he said:

²⁹ 'Modern slavery: The dark side of construction', Chartered Institute of Builders, 2015 ([Link](#))

³⁰ Ibid, page 4

³¹ NCA NRM statistics ([Link](#))

³² GSI, ibid

³³ 'Domestic abuse in England and Wales - Appendix tables' Available from: ([Link](#))

2.1.54 *“Domestic Abuse is the highest risk facing North Wales Police due to the broad impact on the victim (physical, psychological and financial), the number of recorded crimes and an increasing trend”.*³⁴

2.1.55 However, domestic abuse and violence impacts also on both children’s and adult’s services in the local authority and often constitutes a particular complex area of case work requiring a high degree of skills and knowledge.³⁵

Prevent in Anglesey

2.1.56 ‘Prevent’ is a distinct part of the Government’s counter-terrorism strategy which focusses on early intervention through strategies which reduce the likelihood of individuals supporting a violent or extremist ideology or becoming terrorists.³⁶ Prevent is not about catching terrorists, it is about identifying people who are, or may be at risk of radicalisation, and supporting them to change direction in a way that will help them.

2.1.57 Certain groups within the population are more likely to be at risk of radicalisation.

3.0 Impact and Evidence Base

Evidence from elsewhere

3.1.1 Searches for evidence from elsewhere as to the impact of this sort of project in terms of safeguarding have found very little of assistance. Some work has been done around the recent project to build a new nuclear power station at Hinkley point but neither the socio-economic assessment carried out there³⁷ or the one at Sizewell B in Suffolk in the 1990s³⁸ identified (or considered) issues relating to safeguarding. One related area that was covered by the Sizewell B study was that of crime, where they identified a significant increase in the number of arrests, attributable to both construction workers and the rest of the population, although the bulk of the arrests was attributable to the migrant workforce³⁹. One particular area of increase was in the incidence of drinking and driving.

Population Impact

3.1.2 The building of the Wylfa Newydd nuclear power station is a major construction project costed at some £12bn. From the point of view of safeguarding children, young people and adults at risk on the Isle of Anglesey the major impact of the construction will be through the presence of the Wylfa Newydd workforce. It is important to acknowledge that the vast majority of the Wylfa Newydd Project

³⁴ *‘Update for the Police and Crime Panel’* September 2017, Arfon Jones, Police and Crime Commissioner, North Wales ([Link](#))

³⁵ See for example *‘The role of social workers in responding effectively to domestic abuse’* ([Link](#))

³⁶ *‘Extremism and Radicalism’*, North Wales Safeguarding Board ([Link](#))

³⁷ Chapter 8: Socio-economics ([Link](#))

³⁸ *‘Better monitoring for better impact management: the local socio-economic impacts of constructing Sizewell B nuclear power station’*, Glasson, J, Impact Assessment and Project Appraisal, volume 23, number 3, September 2005, pages 215–226

³⁹ *ibid*, page 221

workforce will present no threat whatsoever to the local population. However, inevitably, with a workforce and that size there will be contained within it an element that present some risk to those on the island who are already at risk. The presence of that workforce may also attract elements that are more of a risk to the local population

- 3.1.3 Overall, there will be a negative effect in terms both of increased risk to the “at risk” populations in Anglesey and increased demand for safeguarding and associated services.
- 3.1.4 The workforce management strategy submitted as part of the Planning Application⁴⁰ states that:
- 3.1.5 *“Horizon Nuclear Power (“Horizon”) estimates that at the peak of the construction phase, it will need around 8,500 workers to build the Wylfa Newydd DCO Project (“the Project”). Whilst the central estimate for the size of the workforce is 8,500, this strategy (consistent with the Environmental Impact Assessment) is based on 9,000 construction workers at peak. This allows for a higher number of workers overall or amongst those seeking temporary accommodation.”*
- 3.1.6 Also, there will be a degree of labour force turnover across the 10 year duration of the construction project, meaning that there could be up to 40,000 individuals working on the project at one time or another⁴¹.
- 3.1.7 The proposals to house these workers now comprise:
- a) Provision of up to 4,000 bed spaces on the Site Campus (a purpose built Temporary Workers’ Accommodation within the WNDA).
 - b) A central case that relies on use of 3,000 bed spaces in existing accommodation across Anglesey and parts of the mainland.
 - c) 2,000 workers will be recruited from existing residents recruited locally who will not therefore need temporary accommodation.
- 3.1.8 To reduce the impact of this on the local community they propose:

Workforce Management

- 3.1.9 In their Workforce Management Strategy⁴² Horizon state that in their Code of Conduct relating to workforce behaviour, a number of principles will be followed, including:
- a) All personnel will be required to behave in accordance with the Code of Conduct at all times, regardless of whether they are on-site and off-site within the community.
 - b) All personnel will be required to attend and complete all necessary induction and training programmes prior to the commencement of work.

⁴⁰ Examination Library reference APP-[413]

⁴¹ Examination Library reference APP-[411]

⁴² Examination Library reference APP-[413]

- c) All personnel must be courteous to members of the public and respect and support the needs of the communities in which they work.
- d) All personnel must register with the Workforce Accommodation Management Service. All non-home-based personnel should seek to use the Workforce Accommodation Management Service to identify and secure accommodation in the first instance, before using other accommodation services.
- e) All personnel to be aware of and comply with policies regarding drug and alcohol use including:
 - i. The making, selling and use of any unlawful drugs is strictly prohibited and will result in immediate dismissal.
 - ii. All personnel will drink responsibly and avoid the excess consumption of alcohol both on-site and off-site.
 - iii. All personnel will be subject to random drug and alcohol testing and related searches.
 - iv. All personnel will be required to act as ambassadors for the project through their behaviour and actions (including their use of social media).
 - v. All personnel must treat others with respect and refrain from anti-social, criminal, violent or discriminatory behaviour or sexual harassment and understand that these behaviours will not be tolerated at any time.

3.1.10 Also, Horizon Nuclear Power Wylfa Limited have a Modern Slavery Act 2015 statement in which they set their position as follows:

- a) Our Business
- b) Our policies, principles and standards
- c) Our approach to due diligence
- d) Training & awareness raising
- e) Measuring the effectiveness of our approach

3.1.11 Horizon are committed to making the biggest possible usage of the local workforce, with potentially up to 2,000 jobs going to local people. It is possible that some of these may be open to people with disabilities. Also, the project may create pressure elsewhere on the local jobs market, creating vacancies elsewhere that could be filled in part by people with disabilities. It will be important to ensure that those people are safeguarded in the workplace.

3.1.12 There is also a likelihood that the presence of that additional and transient workforce could lead to an increase in that at risk population, as additional people are attracted to the island and/or subject to human trafficking and/or modern slavery.

3.1.13 In the context of Safeguarding, the impact of this increase in the (largely male) population will be **negative**, presenting further risks and dangers to the at risk population, whether children, young people or adults. The detail of this and of the mitigation proposed by the IACC is set out below.

Dependant Population Increase

- 3.1.14 Whilst most of the workforce are not expected to bring dependents with them during the course of the construction period Horizon have identified that there will be some 285 partners and 220 dependants accompanying members of the workforce (children, partners and other relatives)⁴³. However, that amounts to less than 3% of the incoming workforce bringing dependants at any one time and in fact the actual figures could be much higher, and it will be important to both see how Horizon have arrived at that figure and to monitor (if possible) the number of dependants who do accompany the workforce, and the demands they place upon local social care services. If 3% of the more temporary workforce bring children with them (or decide to settle and then bring in families that number would double, at least).
- 3.1.15 Whilst most of those dependants may be children there may also be older people who accompany members of the workforce and adults with disabilities.
- 3.1.16 Estimating the level of impact upon services is by no means clear- but it is evident that the potential does exist.
- 3.1.17 From the available evidence, IACC expects there to be a negative impact in terms of demand for safeguarding and associated social care services as a result of the arrival of the dependant population.

Population increase Impact - Supporting Children and Young People and Their Families

- 3.1.18 From the available evidence, IACC expects there to be a negative impact in terms of demand.
- 3.1.19 Delivering services to children and young people in need of safeguarding and/or care and support is part of the core statutory responsibilities of the local authority.
- 3.1.20 There will be a number of children and young people who accompany Horizon staff who move to Anglesey, whether for shorter or longer term periods of time. Estimates vary as to how many, but the Horizon figure does seem to be relatively low, given the overall size of the population.
- 3.1.21 Current estimates of the increase in family households arising from the Wylfa Newydd Project are relatively low at around 220, although this may be an underestimate. Figures on the number of children that will come are not yet available, but it could be as high as 507 (according to analysis by the IACC).
- 3.1.22 In 2016, the number of children in need of care and support in Anglesey was 260 per 10,000 population aged under 18.⁴⁴ Therefore the IACC's evidence

⁴³ Examination Library reference APP-[088]

⁴⁴ StatsWales, 'Children in need per 10,000 population by local authority and year', available here: [\(Link\)](#)

base indicates that adding a further 507 children, therefore, could see an increase of around 13 children in need of care and support (which includes children with disabilities).

3.1.23 Services to disabled children and adults, as well as those for older people can be very expensive indeed. However, assuming an additional 13 children the impact upon children's services could be significant.

3.1.24 The IACC would seek mitigation in 2 forms:

- a) Ongoing monitoring of request for assessment and care and support services by disabled and elderly individuals specifically with regards to new families arriving during the build or ongoing operation phase as a consequence of the development.
- b) An agreed formula for resourcing additional activity (in the event that it occurs) of the impact of an increase in the dependent population that would impact upon care and support services for children (including disabled children), disabled adults and older people.

3.1.25 To be effective additional resources would need to be in place and operational before the arrival of workers and dependants begins.

3.1.26 Horizon may also wish to consider what provision and advice and support services it provides to those workers contemplating or actually bringing with them dependent family members, including children.

3.1.27 Monitoring is recognised as a key element of both service delivery and service planning in safeguarding and essential to ensuring that appropriate and effective services are in place.

Population increase Impact – Safeguarding children and young people

3.1.28 From the available evidence, IACC expects there to be a negative impact in terms of demand.

3.1.29 As well as additional care and support needs, there may also be safeguarding issues that arise.

3.1.30 Typically, abuse of children and young people has taken place in the context of households and/or extended families with children at risk from their primary caregivers or others in close proximity. One aspect of this can occur through the formation of new households with predatory men (primarily) moving into live with women where there are already children in the household.

3.1.31 Figures from 2015/16⁴⁵ show that on Anglesey the numbers of children on the child protection register per 10,000 population aged under 18 was 64/10,000. On that basis, an additional 500 children (as discussed above) in Anglesey could be expected to add a further 3-5 children to the register.

⁴⁵ IACC Child Protection Register [\(Link\)](#)

- 3.1.32 In addition to the children who come into the county, there is the possibility that some people in the incoming workforce will form new relationships whilst in Anglesey and possibly new households. Whilst this is not in itself a particular cause for concern the transient and temporary nature of the workforce may mean that there is a degree of instability about these relationships that could be problematic. Some non-relationship-based accommodation arrangements (such as lodgings) may also bring workers into close contact with young children. Whilst in the vast majority of cases such arrangements are likely to be entirely harmless, some risk does exist.
- 3.1.33 Also, there are identified links between deprivation and safeguarding issues. The Joseph Rowntree foundation⁴⁶ found that *'There is a strong association between families' socio-economic circumstances and the chances that their children will experience Child abuse and neglect.'* It is possible, therefore, that the arrival of (local) jobs expected from the project will reduce levels of poverty and this may have a positive effect upon levels of child abuse.
- 3.1.34 However, the emphasis in that report is perhaps upon longer-term consequences of poverty and deprivation and the more short-term effects of the temporary construction and outage maintenance roles in the Wylfa Newydd project may not affect this greatly.
- 3.1.35 Children's Services will require additional resources for the duration of construction period in order to address the statistical increase in child protection referrals caused by the increase in population. Whilst these number seem relatively small, the amount of work required in each case can be significant – more so if the child becomes looked after by the local authority.
- 3.1.36 Children's Safeguarding Services would require additional resources for the duration of construction period. We estimate there will be a need for the following additional posts in terms of the Safeguarding services.
- 3.1.37 In the longer term, children in need of protection often continue to be children in need of care and support. Again, whilst the numbers may seem relatively low, the levels of support required can be high and very resource intensive.

Population Increase Impact - Child Sexual Exploitation

- 3.1.38 From the available evidence, IACC expects there to be a negative impact in terms of demand in this area of activity.
- 3.1.39 Recent instances of 'organised' child sexual grooming and exploitation have focused upon certain ethnic groups and occupations such as taxi drivers operating in urban areas (one recent example has been in Newcastle, as reported by the BBC)⁴⁷.

⁴⁶ 'The relationship between poverty, child abuse and neglect: an evidence review', Joseph Rowntree Foundation, 2016. ([Link](#))

⁴⁷ Operation Sanctuary: Dozens of taxi drivers suspended: ([Link](#))

- 3.1.40 Whilst it is recognised that the circumstances of the Wylfa Newydd workforce will be very different and without the same opportunities afforded occupations such as taxi driving, organised sexual exploitation can exist amongst a variety of different groups⁴⁸. The in-coming workforce at its peak will number around 7,000, mostly men and there will also be significant turnover over time.
- 3.1.41 Information from the National Survey of Sexual Attitudes and Lifestyle⁴⁹ indicates that 11.0% of all men reported ever paying for sex. 3.6% (95% CI 3.1% to 4.2%) of men had paid for sex in the past 5 years.
- 3.1.42 Evidence presented to the Home Office committee on prostitution put forward a number of ways in which people can be drawn into prostitution, particularly at risk young people and those who have been trafficked.
- 3.1.43 Given the likely predominance of men in the Wylfa Newydd workforce, then if that proportion of men from the Wylfa Newydd workforce at any one time are paying for sex, that will number something in excess of 250 men when the workforce is at its peak, and could be more given the very small numbers of families expected to accompany the workforce. Given those numbers, it seems likely that the local sex trade will expand.
- 3.1.44 It may be that some do seek to engage with and exploit local girls and vulnerable young women. Moreover, it may also be the case that such a large and predominantly male workforce attracts the attention of prostitution rings that in turn groom and exploit young girls (and boys) and vulnerable women. Quantifying the likelihood of these risks or their consequences is not possible at this stage but given the scale of the proposed workforce it does have to be a consideration. Also, it is possible that such activity could spread at least into the neighbouring authority of Gwynedd.
- 3.1.45 The most detailed analysis of the prevalence of child sexual exploitation is from the Centre of Expertise on Child Sexual Abuse (CECSE) at the London Metropolitan University.⁵⁰ Their information is largely based upon England but does have some Welsh data where this is available. They also note that the highest rates were reported in areas where there had been recent high profile cases and in coastal towns.
- 3.1.46 They show a significant variation in the number of children assessed by different local authorities as being at risk of child sexual exploitation per 10,000 child

⁴⁸ The Office of the Children's Commissioner's Inquiry into Child Sexual Exploitation in Gangs and Groups identified 'Groups' as '*...two or more people of any age, connected through formal or informal associations or networks, including, but not exclusive to, friendship groups.*'

⁴⁹ Reported in '*The prevalence of, and factors associated with, paying for sex among men resident in Britain: findings from the third National Survey of Sexual Attitudes and Lifestyles (Natsal-3)*', Jones, GK et al, BMJ Journals, 2014 ([Link](#))

⁵⁰ '*Measuring the scale and changing nature of child sexual abuse and child sexual exploitation Scoping report*', Professor Liz Kelly and Kairika Karsna July 2017, Centre of Expertise on Child Sexual Abuse at the London Metropolitan University ([Link](#))

population. For some local authorities it is as low as 0-4 per 10,000 population, whilst the highest record 30+ (Over half report the rates as between 10 and 19 per 10,000 of child population). (Anglesey's known incidence of CSE currently is relatively low).

3.1.47 They also found that the two offences most clearly associated with CSE – abuse of children through sexual exploitation and sexual grooming – make up 3.0% of police recorded CSA cases in England and 2.0% of cases in Wales. In 2015/16 they identified that there were 3,241 offences against children reported by the Police in Wales.

3.1.48 One obvious determinant of the prevalence of CSE is the size of the adult population. Combining the CECSE information above with population information from StatsWales,⁵¹ gives an average figure of just over 12 reported CSE offences per 10,000 adult population per annum in Wales. The increase in the male adult population during the course of the Wylfa Newydd construction project (see below) is likely to be around 7,000 at any one time. A crude calculation based upon the CSE and population figures referred to above would suggest that this could lead to a further 15-20 reported cases of CSE per annum in Anglesey.

3.1.49 There is still relatively little known about those who carry out child sexual exploitation⁵², beyond some identified character traits. However, in the CECSE report, they note that overwhelmingly child sexual abuse offences are perpetrated by males.

3.1.50 The North Wales Safeguarding Board and the local delivery group need to ensure that the strategy and arrangements in place in Anglesey (but also in Gwynedd) are fit for purpose and sufficiently well-resourced for a possible increase in child sexual exploitation. Pre-emptive action is perhaps a key area for focus, with an emphasis upon encouraging and supporting girls and young women who may be at risk not to be enticed into exploitive relationships and activity.

3.1.51 The resource implications of supporting children and young people who have been subject to child sexual exploitation can be very significant, requiring both in-house staff and also specialist support from external organisations, which need to be funded by the local authority. The cost of specialist residential care is particularly high. If there is a significant increase in the incidence of CSE as outlined above, then there could also be a need for specialist residential placements for a small number of the victims, although such placements are very expensive.

3.1.52 There will also be a need for additional youth work capacity and Education Welfare Officers.

3.1.53 The Horizon code of conduct for staff should explicitly address these issues, reminding the workforce of their responsibilities as citizens towards potentially

⁵¹ StatsWales Population data, available at: [\(Link\)](#)

⁵² 'Child sexual exploitation: Who is affected', NSPCC, available here: [\(Link\)](#)

exploited children and young people and the legal position with regard to sexual activity with them. Horizon will need to consider the accessibility of internet pornography at its own accommodation sites and to take steps to ensure that unacceptable and illegal material is not accessible through its own internet access networks.

3.1.54 The Office of the Children's Commissioner's Inquiry into Child Sexual Exploitation in Gangs and Groups identifies 9 essential foundations of good practice in this area:

- a) Everyone on alert.
- b) Spotting the warning signs.
- c) Joined-up working.
- d) Pre-emptive action.
- e) Scrutiny & Oversight.
- f) Focus on the Child.
- g) Gaining a child's confidence.
- h) Leadership.
- i) Strategic Planning.

3.1.55 The 9 essential foundations of good practice arose out of the work of the Office of the Children's Commissioner and were developed through a thorough and wide-ranging survey of existing practice and its effectiveness. Although the All-Wales guidance on child sexual exploitation is being reviewed, in the light of the Wylfa Newydd project the North Wales Safeguarding Board and the local delivery group may wish to review their own existing arrangements and to look at how they can strengthen services, and support local young people and those coming into the county to avoid a growth in child sexual exploitation.

3.1.56 A range of resources exist that may be helpful in strengthening the local response to Child Sexual Exploitation (CSE). One useful resource is The Barnardos Child Sexual Exploitation and Sexual Health Resource pack,⁵³ the aim of which is to:

- a) Facilitate, in a number of youth settings to raise awareness of CSE and Sexual Health.
- b) Equip facilitators to effectively engage young people aged 13 and above in the subject area. The short films within it have been designed to enable young people to discuss the issue whilst protecting them from personal disclosure in a safe and secure learning environment.

3.1.57 '*Seen and heard.org.*'⁵⁴ also produce and identify a range of resources to help combat child sexual exploitation, including research findings and practical guidance.

⁵³ '*The Real Story*' Barnardos, available at: [\(Link\)](#)

⁵⁴ Child sexual abuse and child sexual exploitation [\(Link\)](#)

Population Increase Impact - Safeguarding Older People

3.1.58 From the available evidence, IACC expects there to be a negative impact in terms of demand in this area of activity.

3.1.59 Horizon and IACC anticipate⁵⁵ that up to 740 workers will be accommodated through the use of the 'latent accommodation' described as *'granny flats and spare rooms that are not currently rented out'*.

3.1.60 At the same time there is strong evidence that much of this sort of accommodation is to be found in the households of older people (up to half of it, in one study).⁵⁶ Whilst many older people will be more than capable of letting out space in their accommodation and effectively managing that arrangement, there will be some who find it trying and, potentially others for whom it becomes a safeguarding issue for reasons of financial abuse and/or other forms of ill-treatment.

3.1.61 The potential harm that could accrue to older people can be mitigated by Horizon ensuring that as many accommodation arrangements as possible are made through their accommodation service and by Horizon working together with the IACC to ensure that safeguarding is a key element of the work of the accommodation matching service and that care is taken to ensure that prospective householders are properly able to manage a placement and that placements are reviewed periodically with a view to ensuring the well-being of householders.

3.1.62 There are a number of steps open to prospective 'live in' landlords to ensure that the letting arrangement is a satisfactory one (see for example the measures outlined on the lodgdersite.com website.⁵⁷) The Horizon Accommodation service can work with prospective 'live in' landlords to help them understand their rights and those of their tenants and to ensure that the proper steps are taken to verify the suitability of the arrangements. Adult Services will need additional resource to support individuals affected.

3.1.63 Again, this is a new and unfamiliar area of work. However, the local authority has a clear statutory duty to safeguard older people at risk. The recently published Welsh Government *'Information and guidance on domestic abuse - Safeguarding older people in Wales'*⁵⁸ identifies that the acknowledgement of coercive and controlling behaviour as part of domestic abuse of older people is very important and must be tackled. It notes also, that at times concerns arise because household members find themselves confronted with problems beyond their capacity and capability. However, not all abuse of older people is domestic violence (financial abuse for example) and responding effectively to all types of abuse is, in any event, a responsibility for the local authority and its

⁵⁵ 'Wylfa Newydd Project - 8.4 Workforce Accommodation strategy', ([Link](#))

⁵⁶ 'Older people's housing: choice, quality of life, and under-occupation', Joseph Rowntree Foundation, 2012, ([Link](#))

⁵⁷ How to Avoid a Terrible Lodger ([Link](#))

⁵⁸ Information and guidance on domestic abuse: Safeguarding older people in Wales ([Link](#))

partner agencies. At the same, preventing such circumstances arising by controlling lettings is clearly an important element of the overall response.

Population Increase Impact - Safeguarding Adults at risk

3.1.64 From the available evidence, IACC expects there to be a negative impact in terms of demand in this area of activity.

3.1.65 Many of the risks identified above for children and young people apply as well to adults at risk. The creation of new relationships and/or new households (through lettings) will bring some adults who may be at risk (either younger disabled people or older people) into close contact with elements of the Wylfa Newydd workforce. Again, for many this will be a positive experience, but for some it may increase their vulnerability and the potential for abuse and/or exploitation. People with disabilities can also be the subject of hate crimes, but often are more likely to be the victims of 'mate crime' at the hands of someone who has ostensibly be-friended them, but then exploited that relationship. As indicated above, many people with mild to moderate learning disabilities are often not known to adult social care, but may well come to need support as a result of their experiences at the hands of others.

3.1.66 An example of possible abusive circumstances could be where an older person provides accommodation for a member of the workforce and is intimidated and/or abused financially. A younger disabled adult living alone could be abused in a number of ways, including being forced to accommodate somebody unwillingly or else being physically, financially or sexually abused or exploited. They may also be drawn into the illegal drugs trade. Vulnerable young women in particular might be exploited sexually, either by individuals or in an organised context.

3.1.67 Like children and young people, adults with a learning disability living independently in the community may also be recruited by illegal drug gangs and this may extend to effectively taking over their accommodation to use as a base for dealing drugs (A practice known as '*cuckoo-ing*'). There is also a potential for young women, in particular to become exploited within the sex trade.

3.1.68 Like some older people they may also face a risk were they to let out space within their accommodation to people from the Wylfa Newydd workforce.

3.1.69 In terms of lettings, again the potential harm here can be mitigated by Horizon ensuring that as much accommodation as possible is arranged through their letting service and that they work together with the IACC to ensure that safeguarding is a key element of the work of the accommodation matching service, and that care is taken to ensure that prospective householders are properly able to manage a placement and that placements are reviewed periodically with a view to ensuring the well-being of householders.

3.1.70 In terms of the illegal drugs trade and the sex trade, it will be important for adult services to ensure that adults with learning disabilities living independently in the community have a greater degree of advice and support and regular

opportunities to tell services about their current circumstances and any changes in their living arrangements and other activities. Also, Adult Services need to have good and effective collaborative arrangements in place to work with the Police and other agencies.

3.1.71 Adult Services may need additional resource to support both individuals affected and those potentially at risk. A Local Area Co-Ordinator with a focus on educating communities could be employed. Such a service would be best commissioned by the Local Authority through a local third sector organisation for the duration of the construction.

3.1.72 As with older people at risk of abuse, the local authority has a clear duty and responsibility to work to avoid abusive situations and to respond to them when they occur. In terms of lettings, again a preventative approach is clearly to be preferred. Similarly, the local authority needs to be pro-active in protecting people with learning disabilities in the community from what is identified as a greater level of risk.

Population Increase Impact – Illegal Drug Use

3.1.73 Notwithstanding the zero-tolerance policies advocated by Horizon, it seems likely the arrival of workers into Anglesey could lead to a growth in the local market for illegal drugs and an increase in drugs-related activity. With a likely growth in the working age population of some 17% whilst the project is in progress, and notwithstanding the HR policies proposed by Horizon, this will present a growing threat to young people and adults at risk within the county at a time when dangers are already arising from the expansion of the drugs trade into rural areas.

3.1.74 There is a growing awareness of the 'County Lines' approach being adopted by many urban drug gangs to expand their activities into more rural areas. The Children's Society describes the activity as follows:

3.1.75 *"Gangs are deliberately targeting vulnerable children – those who are homeless, living in care homes or trapped in poverty. These children are unsafe, unloved, or unable to cope, and the gangs take advantage of this."*

3.1.76 *These gangs groom, threaten or trick children into trafficking their drugs for them. They might threaten a young person physically, or they might threaten the young person's family members. The gangs might also offer something in return for the young person's cooperation – it could be money, food, alcohol, clothes and jewellery, or improved status – but the giving of these gifts will usually be manipulated so that the child feels they are in debt to their exploiter.*

3.1.77 *However, they become trapped in county lines, the young people involved feel as if they have no choice but to continue doing what the gangs want.⁵⁹*

⁵⁹ 'What is County Lines?' – Children's Society website available at: [\(Link\)](#)

3.1.78 Whilst the Police are the lead agency in countering what is clearly an expansion of criminal activity the local authority has a particular role to play in identifying and supporting young people at risk (including those who have left care) and adults to avoid becoming involved in this activity. In addition, the Police have identified a key role for partner agencies in:

- a) Noting the growth of 'County Lines' and its implications for North Wales.
- b) Considering how they will brief their staff on the issue and the signs they need to be aware of.
- c) Acknowledging the broadening safeguarding landscape which is expanding beyond the traditional safeguarding agenda.
- d) Developing strategies around 'county lines' issues around staff awareness, spotting the signs, sharing of information and intelligence and providing accessible services to those affected.

3.1.79 It seems likely that the local authority services will need to strengthen their co-operation with other agencies and the capabilities of their own staff to identify and respond to these issues. They will also need to improve their ability to support at risk young people and adults generally and to effectively divert them away these activities. Local authority services may need additional resource to support individuals affected, but the likely extent of this is not yet clear. This area will require close monitoring in conjunction with the Police to fully ascertain the impact over the course of the construction project. Further resource requirements may be identified as the project progresses.

3.1.80 Horizon will have a big role to play in supporting its workforce not to engage in the illegal drugs trade. We would expect to see the staff code of conduct to contain rigorous measures to ensure that the use of illicit drugs by the workforce is kept to an absolute minimum.

3.1.81 The emergence of 'County Lines' is a relatively new phenomenon and effective responses to it are still being explored and developed. The Police are clear about the importance of tackling this problem and place a high priority on it, and on the need for effective partnership working in order to do so. Developing the knowledge and skills of staff in children's services has been highlighted by the Police as has the need to develop local strategies.

3.1.82 Also, there is growing evidence of young people and adults who may be at risk being drawn into the illegal drugs trade in more rural parts of the country⁶⁰. This has a number of safeguarding implications including those for children living in households where adults are abusing substances.

Population Increase Impact - Trafficking and/or Modern Slavery

3.1.83 From the available evidence, IACC expects there to be a negative impact in terms of demand in this area of activity.

⁶⁰ County Lines Violence, Exploitation & Drug Supply 2017, National Briefing Report, available at [\(Link\)](#)

3.1.84 Anglesey already contains a major UK port at Holyhead, and as such it is already a point of entry for people who are being trafficked illegally⁶¹. Once they have entered the UK they may be particularly vulnerable to further exploitation, particularly within the sex trade and that for illegal drugs. The increase in the (male) population occasioned by the Wylfa Newydd Project workforce could increase the volume of trade in both those areas. Also, a risk (although probably a lesser one) is that of people being forced into modern slavery in more general service industry activity, generated to support the Wylfa Newydd Project workforce.

Population Increase Impact – Violence against Women, Domestic Abuse, Sexual Violence

3.1.85 From the available evidence, IACC expects there to be a negative impact in terms of demand in this area of activity.

3.1.86 **Violence against Women, Domestic Abuse & Sexual Violence remains a common occurrence and often requires skilled social work in-put and potentially also other services to work with the individuals and families to support, minimise risk and safeguard children and adults at risk. Whilst there will be a number of families moving into Anglesey as a result of the Wylfa Newydd construction project, as with children's safeguarding there is the possibility of new households being formed and domestic abuse arising as a consequence.**

3.1.87 It will be important to work with the Police and to monitor the levels of domestic violence in Anglesey and whether or not any does occur in either in-coming or newly-formed households involving members of the Wylfa Newydd construction workforce.

3.1.88 Responding to domestic violence is part of the statutory responsibilities of the local authority.

3.1.89 Domestic Violence and Abuse is a wide-ranging and complex phenomenon. The cross-government definition of domestic violence and abuse is:

3.1.90 *“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. The abuse can encompass, but is not limited to:*

- a) psychological
- b) physical
- c) sexual
- d) financial
- e) emotional
- f) Controlling behaviour

⁶¹ Slaves trafficked through North Wales 'on daily basis', detective warns, Daily Post, 21 April 2017
[\(Link\)](#)

3.1.91 (*'Controlling behaviour'* is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.)

3.1.92 They also identify *'coercive behaviour'* as “...an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse “that is used to harm, punish, or frighten their victim.”⁶²

3.1.93 The Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act⁶³ aims to improve the Public Sector response in Wales to such abuse and violence. Amongst other things the Act is intended to:

- a) Improve arrangements to promote awareness of, and prevent, protect and support victims of gender-based violence, domestic abuse and sexual violence
- b) Ensure a needs-based approach to developing strategies which will ensure strong strategic direction and strengthened accountability
- c) Ensure strategic level ownership of the issue.
- d) Ensure consistency, quality and join-up of service provision in Wales.

3.1.94 Even with these legal remedies to stop domestic violence and abuse, it remains an issue in many households.

Population Increase Impact - Prevent

3.1.95 From the available evidence, IACC expects there to be a neutral impact in terms of demand in this area of activity.

3.1.96 Although there are currently very low levels of referral for *'Prevent'* activity in Anglesey, the position could be exacerbated by the arrival of the large workforce required for the Wylfa Newydd construction project, the composition of that workforce and the impact that it may have on local communities. However, at this stage monitoring any potential additional activity will be the main requirement.⁶⁴

3.1.97 Also, Horizon will need to incorporate *'Prevent'* safeguards into its staff code of conduct and to take action (in conjunction with statutory agencies) where extremist activity is suspected.

3.1.98 Alongside a raft of other local bodies, the IACC has a duty under the Counter-Terrorism and Security Act 2015 in the exercise of their functions, to have “*due regard to the need to prevent people from being drawn into terrorism*”.

3.1.99 A key part of the Prevent strategy is “Channel”, under which the Police work with other public bodies, including local councils, to identify those at risk of being

⁶² *'Domestic Violence and Abuse Guidance'* [\(Link\)](#)

⁶³ *'Violence against women and domestic abuse'*, Welsh Government, Available at: [\(Link\)](#)

⁶⁴ Compiled after discussion with local Police *'Prevent'* co-ordinator.

drawn into terrorism, assess what the risk might be and then to develop tailored support for those referred to them. Anglesey is a relatively low activity area for Prevent, with only a small number of referrals made of people potentially at risk of being drawn into extremist activity, mostly right-wing extremism.

Monitoring Impact

3.1.100 Whilst this report has sought to identify the potential impact of the Wylfa Newydd project in terms of safeguarding children and adults at risk, ongoing work will be needed to monitor each of these areas of activity in order both to ensure the well-being of the population and to protect the reputation and integrity of the project itself. Through the mitigation proposals set out in this report we will continue to monitor the impact of the project and to review the impact of the project and the effectiveness of those mitigation proposals.

3.1.101 As we have reviewed the available material around the impact of major projects we have found that there is very little available on the longer-term impact of the construction phase of those projects and how they have affected the local population during the course of the construction.

3.1.102 We do believe that the unique geography and identity of the Isle of Anglesey provides an excellent opportunity for ground breaking research to be undertaken to evaluate that longer-term impact of major projects upon the social fabric of a local community. We believe that such a study, independently conducted, would be of great value not only to the local community in Anglesey but also to Horizon, as further projects of this scale are planned and undertaken.

3.1.103 Accordingly, the IACC would welcome discussions with Horizon and with the Welsh Government about the possibility of commissioning such a study.

4.0 Policy Position

4.1.1 Whilst statutory duties are clearly identified for the local authority and its partner agencies, the North Wales Safeguarding Board has a key role and impact in terms coordinating local work to safeguard and promote the welfare of children and to ensure the effectiveness of what the member organisations do individually and together.

Safeguarding *Children* Board

4.1.2 The Board has the overall responsibility for challenging relevant agencies in the area so that:

- a) There are effective measures in place to PROTECT children
- b) There is effective inter-agency co-operation planning and delivering protection services and in sharing information
- c) Anticipating & Identifying where there may be individuals affected and work with service providers to develop earlier identification and preventative services
- d) Promote effective multi agency support services

- e) Promote inter agency approaches to working with community groups and organisations where there may be populations at risk of harm
- f) Using inter-agency training and dissemination of learning and research to help build a more confident and knowledgeable multi agency workforce

Safeguarding Adults Board

4.1.3 The objectives of a Safeguarding Adults Board are:

- a) To protect adults within its area who have needs for care and support (whether or not a local authority is meeting any of those needs) and are experiencing, or are at risk of, abuse or neglect,
- b) To prevent those adults within its area becoming at risk of abuse or neglect

4.1.4 The developments proposed to mitigate the impact of the population changes occasioned by the Wylfa Newydd construction project fit in well with the overall approaches taken by the Safeguarding board and by the IACC in delivering upon its statutory responsibilities in this area.

5.0 Gaps in Information/Documentation

5.1.1 The information provided by Horizon relates primarily to the size and composition of the construction workforce and also the proposed arrangement for accommodating them. Some figures have been provided with regard to accompanying dependants but there does seem to be an assumption by Horizon that few, if any, of the construction workforce will bring dependants with them. This remains to be seen.

5.1.2 The information available with regard to all aspects of safeguarding in Anglesey is relatively limited and agencies do not hold a large amount of data in this area. At the same time, Anglesey is a relatively small local authority area and the base numbers involved are sometimes small and can be disproportionality impacted upon by small/individual change.

5.1.3 There is very limited previous research or evaluation evidence available about the impact of major construction projects (or similar) in terms of Safeguarding. Also, some of the evaluation materials that have been produced are not publicly available.

5.1.4 The previous Pre-Application Consultation Reports (PAC1, PAC2 and PAC3) documentation was based upon the narrower health impact assessment requirement (which pre-dates the current Well-being legislation) and does not appropriately address well-being. This is despite the issue being raised by the IACC in its response to the project update document and the Health Impact Assessment Progress Report (HIAPR) and also a number of discussions between Horizon Nuclear Power, the IACC and well-being partners over the past 6 months.

5.1.5 The HIAPR discusses the demand for some medical and health care services but does not make any reference to social care and well-being services. This

is a significant omission as the Social Services and Well-being (Wales) Act 2014 provides a framework for further collaboration and integration of health, social care and wellbeing. This is regrettable as the IACC has previously stated this in its response to the Project Update document and the HIAPR.

- 5.1.6 Also, the Environmental Impact Assessment Report (EIAR) discusses a very narrow interpretation of public services, makes no explicit reference to services that are commissioned to meet the needs of children, young people and adults at risk, and mental health/illness issues are also a significant omission.
- 5.1.7 As previously proposed, the IACC requests a more detailed discussion on how the health, social care and well-being impacts of the proposed developments are addressed as part of the entire project. Consideration should be given to including this within the scope of the community cohesion assessment (which was not included in PAC1 or PAC2 and is yet to commence). The proposed Health and Well-being Strategy should also be a focus for these discussions. This chapter largely focuses upon one area of social care provision, specifically that of Safeguarding children, young people and adults at risk of harm and adds that as a topic for this discussion.

6.0 Summary of Mitigation proposals

- 6.1 Based upon the above, a summary of proposed mitigation is set out in Table 9 (overleaf).

Table 9: Summary of Mitigation proposals

Issue	Mitigation Summary	Type of Mitigation	Who Should Be Responsible for Mitigation?	When?
Supporting children, young people and their families	The full likely impact of incoming children upon children's services cannot be fully estimated. Ensuring effective monitoring of the number of dependants/children moving to Anglesey will be important, as will monitoring the numbers of children's safeguarding referrals and associated indicators, to provide evidence of the need for any further action.	Obligation	IACC	Service will be established in advance of arrival
Safeguarding children and young people	<p>The full likely impact of incoming children upon children's services cannot be fully estimated until there is a clear idea of how many children that will be. However, there will be some impact in terms of both children in need of care and support and child protection. Ensuring effective monitoring of the number of dependents/children moving to Anglesey will be important, as will monitoring the numbers of children's safeguarding referrals and associated indicators, to provide evidence of the need for any further action.</p> <p>In the longer term, children in need of protection often continue to be children in need of care and support. Again, whilst the numbers may seem relatively low, the levels of support required can be high and very resource intensive.</p>	Community Resilience Fund	<p>Horizon to provide resource.</p> <p>IACC will provide care and support as according to the legislative requirements, Social Services & Well-being Act 2014.</p>	<p>Service will be established in advance of arrival.</p> <p>Year 3 of construction as families begin to arrive.</p> <p>Active monitoring during construction and operational phases. Need to establish process for monitoring number of families as they arrive,</p>

Issue	Mitigation Summary	Type of Mitigation	Who Should Be Responsible for Mitigation?	When?
	Horizon may also wish to consider what provision and advice and support services it provides to those workers contemplating or actually bringing with them dependent family members, including children.			since this will have implications for Education, Children's Services and Health.
Child Sexual Exploitation	<p>The North Wales Safeguarding Board and the local delivery group need to ensure that the strategy and arrangements in place in Anglesey (but also in Gwynedd) are fit for purpose and sufficiently well-resourced for a possible increase in child sexual exploitation</p> <p>The resource implications of supporting children and young people who have been subject to child sexual exploitation can be very significant, requiring both in-house staff and also specialist support from external organisations such as Barnardo's. The cost of specialist residential care is particularly high. children/young people will require specialist residential care each year.</p> <p>The Horizon code of conduct for staff should explicitly address these issues, reminding the workforce of their responsibilities as citizens towards potentially exploited children and young people and the legal position with regard to sexual activity with them.</p>	Obligation	<p>Horizon to provide resource.</p> <p>IACC will provide care and support as according to the legislative requirements, Social Services & Well-Being Act 2014.</p> <p>IACC will commission specialist support.</p>	Now – Important to raise awareness and build resilience in advance of construction.

Issue	Mitigation Summary	Type of Mitigation	Who Should Be Responsible for Mitigation?	When?
	Horizon will need to consider the accessibility of internet pornography at its own accommodation sites and to take steps to ensure that unacceptable and illegal material is not accessible through its own internet access networks.			
Safeguarding Older People	<p>The potential harm that could accrue to older people can be mitigated by Horizon working together with the IACC to ensure that safeguarding is a key element of the work of the accommodation matching service.</p> <p>The Horizon Accommodation service should cover as much of the workforce as possible, and work with prospective 'live in' landlords to help them understand their rights and those of their tenants and to ensure that the proper steps are taken to verify the suitability of the arrangements. Adult Services may need additional resource to support individuals affected.</p>	Community Resilience Fund	Horizon and IACC	Monitoring referrals to Adult Safeguarding and consequence service implication.
Safeguarding Adults at Risk of Abuse	Adult Services may need additional resource to support both individuals affected and those potentially at risk. A Local Area Co-Ordinator with a focus on educating communities could be employed. Such a service would be best	Community Resilience Fund	IACC	Monitoring referrals to Adult Safeguarding and consequence

Issue	Mitigation Summary	Type of Mitigation	Who Should Be Responsible for Mitigation?	When?
	commissioned by the Local Authority through a local third sector organisation.			service implication.
Involvement in the Illegal Drugs Trade	<p>It seems likely that the local authority services will need to strengthen their co-operation with other agencies and the capabilities of their own staff to identify and respond to these issues. They will also need to improve their ability to support at risk young people and adults generally and to effectively divert them away these activities. Local authority services may need additional resource to support individuals affected, but the likely extent of this is not yet clear.</p> <p>Horizon will have a big role to play in supporting its workforce not to engage in the illegal drugs trade.</p> <p>We would expect to see the staff code of conduct to contain rigorous measures to ensure that the use of illicit drugs by the workforce is kept to an absolute minimum.</p>	Community Resilience Fund	<p>Horizon to robustly implement drug and alcohol testing arrangements to prevent a culture and market from developing.</p> <p>In the absence of robust testing, will need to monitor whether there is a growth in drug dealing locally, with Horizon to fund all costs involved in dealing with the consequences, particularly for Police and Health.</p>	Monitoring referrals to Adult Safeguarding and consequence service implication.
Trafficking and/or Modern Slavery	The IACC needs to be able to provide accommodation, advice and support to trafficked persons and has particular responsibilities for children and adults at risk of harm, who are identified as such. As identified above, even where the numbers are small, the impact, and the	Obligation	<p>Horizon.</p> <p>IACC may be required to be provide temporary</p>	<p>Now.</p> <p>Active monitoring by the Police.</p>

Issue	Mitigation Summary	Type of Mitigation	Who Should Be Responsible for Mitigation?	When?
	<p>resources required, can be significant. It is proposed that the local authority appoint an officer to support multi-agency working, for the duration of the construction.</p> <p>Horizon needs to be explicit about how it will combat modern slavery activity not only in its own directly-employed workforce, but perhaps more importantly in those of its sub-contractors and suppliers of goods and services.</p>		accommodation and support.	
Violence against Women, Sexual Abuse and Domestic Violence	It will be important to work with the Police and to monitor the levels of domestic violence in Anglesey and whether or not any does occur in either in-coming or newly-formed households involving members of the Wylfa Newydd construction workforce.	Obligation	IACC	Now – Important to raise awareness and build resilience in advance of construction.
Prevent	Monitoring of extremist activity and 'Prevent' Referrals.	Obligation	Police Chair with Local Authority input.	Active monitoring.

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