



Home Office

First responder guide for England and Wales: Referring victims of modern slavery and human trafficking

A document to help first responders complete the online referral form. The purpose of this document is to act as a guide for first responders. The Guidance sets out the NRM process and guides first responders on how to explain the NRM to a potential victim, host a trauma informed interview and to simplify what is expected of them, so they have all the necessary information to submit a good quality referral.

This guide is for first responders in England and Wales¹. Guidance for first responders in Scotland and Northern Ireland is available here: [National referral mechanism guidance: adult \(Northern Ireland and Scotland\) - GOV.UK](#)

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¹ The geographical remit of this document is in accordance with section 1.8 of the [Modern Slavery: Statutory Guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\)](#) and [Non-Statutory Guidance for Scotland and Northern Ireland](#)

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Introduction

This document aims to provide clear, user-friendly guidance and practical advice to support first responders to identify victims of modern slavery and increase the quality of referrals to the National Referral Mechanism (NRM) in England and Wales. [Separate guidance for cases in Scotland or Northern Ireland](#) is available. If you are based in Scotland, the [toolkit published by TARA](#) provides support for all first responders.

All first responder organisations should make sure they have pathways and protocols in place to support first responders and ensure that they are trained appropriately. The Home Office has produced two high level e-learning modules for use by all first responders.

The [First Responder e-learning](#) training covers:

- o indicators of modern slavery
- o what to do when you encounter a potential victim of modern slavery

The [Child Victims of Modern Slavery e-learning](#) covers:

- o child-specific indicators of modern slavery
- o forms of exploitation that are particularly prevalent
- o safeguarding and NRM referral processes
- o specific knowledge required to respond to child cases of modern slavery

The following guidance is available to support you further:

- o [England and Wales NRM Guidance](#) - this guidance clarifies how potential victims should be identified and referred to the NRM, as well as the process for assessing and determining eligibility for support. This guidance is for all adult cases in England or Wales.

Please also note, this document is not a replacement for the [Modern Slavery: Statutory Guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and Non-Statutory Guidance for Scotland and Northern Ireland](#).

1. What is modern slavery?

'Modern slavery' is an umbrella term that encompasses the crimes of human trafficking and slavery, servitude, forced and compulsory labour. The government is committed to tackling it, taking a holistic approach that puts victims first. Victims of modern slavery can be men, women and children of any age across the world. There can be an assumption that most victims of modern slavery are trafficked to the UK from other countries, but residents of the UK are also among the victims that are exploited in the UK and other countries. While some victims are in accommodation, others may be destitute or still in exploitation and urgent support should be provided to ensure they are able to access their ECAT entitlement of secure accommodation.

UK nationals were the most commonly referred nationality into the NRM in 2024, representing 23% of all referrals made in the year (4,441). Albanian nationals were the second most referred, accounting for 13% of all referrals made in the year (2,492), with Vietnamese nationals being the third most commonly referred (11%: 2,153).

It is important for professionals to understand the specific vulnerability of victims of modern slavery and utilise practical, trauma-informed methods of working which are based upon fundamental principles of dignity, compassion and respect. Victims' voices must always be heard, and their rights respected.

"The best idea is to think of the victim in terms of rehabilitation and work towards it. You are working with people who have been in an environment where they were slaves; they now need to learn how to be in an environment where they are human. See how institutional efforts can be addressed in this direction: Staff need to be able to assist and guide victims as specific individuals; caring for each person requires more than protocols and appointments." **Michael, 40, survivor of modern slavery.**

For more information on modern slavery, see:

[The impact of the Modern Slavery Act 2015](#) and [Modern Slavery is closer than you think: Understanding Modern Slavery and Human Trafficking](#).

2.What is the NRM process?

The NRM is the framework by which the UK identifies and supports potential victims of modern slavery. The NRM was introduced in 2009, in response to signing the Council of Europe Convention on Action against Trafficking in Human Beings (ECAT).

Many victims are already in suitable, secure and appropriate accommodation when they enter the NRM, such as Asylum Support or Local Authority accommodation, or living in their own private accommodation or with friends or family. Even if they have access to such accommodation, they may still be entitled to NRM support, including accommodation, if their existing accommodation is, or becomes, unsuitable.

Child victims are supported by local authorities under the Children's Act 1989, as well as Independent Child Trafficking Guardians (ICTGs) where available.

The aim of the NRM is to be a bridge to recovery. It should:

- o lift victims out of situations of exploitation;
- o provide them with a short period of intensive support and specialist care; and
- o put them in a position where they can begin to rebuild their lives with increased resilience against future exploitation.

The NRM consists of:

- o the Single Competent Authority (SCA) – one of the UK's decision-making bodies; it makes 'Reasonable Grounds' and 'Conclusive Grounds' decisions as to whether people are victims of modern slavery.
- o the Immigration Enforcement Competent Authority (IECA) – the second decision-making body, responsible for a specific cohort of adult cases².
- o the Modern Slavery Victim Care Contract (MSVCC) – provides support to adult victims of modern slavery (child victims are supported by local authorities under the Children's Act 1989).
- o the Independent Child Trafficking Guardianship (ICTG) service – provides advice and advocacy on behalf of potential and confirmed child victims of modern slavery in ICTG areas. ICTGs provide modern slavery specific support in addition to the local authority support. The ICTG service is currently available across two-thirds of local authorities in England and across Wales³.
- O The Devolved Decision-Making Pilot - tests whether determining if a child is a victim of modern slavery within existing safeguarding structures is a more appropriate model for making modern slavery decisions for children. As of January 2025, there are currently twenty pilot sites across the UK, covering a total of 30 local authorities.

² IECA's specific cohort of adult cases is listed in Annex E, para 4.14 of the [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) - GOV.UK](#)

³ For a full list of areas where the ICTG Service is available please see the [ICTG Interim Guidance](#).

There are two decision points in the NRM process⁴:

1. 'Reasonable Grounds' (RG) decision is a decision taken by the competent authorities as to whether the decision maker agrees there are reasonable grounds to believe, based on all available general and specific evidence but falling short of conclusive proof, that a person is a victim of modern slavery.
2. The relevant competent authority will then gather further information to make a 'Conclusive Grounds' (CG) decision assessing whether, on the balance of probabilities, there are sufficient grounds to decide that the individual is a victim of modern slavery.

⁴ For more information on the decision-making process by the Competent Authorities, please see section 13 of this document.

3. Informed consent

Consent is required for **adult** potential victims to enter the NRM. You will be asked to confirm that the adult potential victim provided you with consent upon referral. For an adult to provide their informed consent they need to have a clear idea of what it is they are consenting to.

Therefore, you **must** explain:

- o what the NRM is (please see section 9 of this document for further information)
- o what support is available through it
- o what the possible outcomes are for an individual being referred
- o what an individual's options are if they do not consent to enter the NRM
- o explain the difference between informed consent and Duty to Notify (see section 4)
- o how the Home Office uses the data and who it is shared with⁵, noting that the police will receive this data

If the potential victim is under 18, or may be under 18, an NRM referral must be made for them. **Child potential victims do not have to consent to be referred into the NRM** and must first be safeguarded and then referred into the NRM process.

⁵ Both competent authorities are entitled to process information in accordance with the Data Protection Act 2018 and the General Data Protection Regulation and where appropriate refer this information to the police to support the detection and prevention of crime

4. Duty to Notify

In England and Wales, public authorities specified in **section 52 of the Modern Slavery Act 2015**, have a statutory Duty to Notify (DtN) the Home Office when they come across an adult potential victim of modern slavery who does **not** consent to being entered into the NRM.

A Duty to Notify should be completed using the same online process as an NRM referral.

The '**DtN**' applies to:

- o all police forces in England and Wales
- o all local authorities in England and Wales
- o the Gangmasters and Labour Abuse Authority
- o the National Crime Agency
- o certain parts of the Home Office in their capacity as first responder organisations (UK Visas and Immigration, Border Force and Immigration Enforcement)

As a child is not required to give consent to enter the NRM all child potential victims should be referred into the NRM and the DtN process does not apply. There is more information on DtN in the [guidance for specified public authorities](#).

Find general information on [how personal information is used](#).

What to do when an adult potential victim does not consent to enter the NRM

Once the first responder has explained the NRM process to an adult potential victim and they have decided not to give consent to enter the process, the next step is to complete a DtN form.

The DtN form is created automatically on the online form when the first responder indicates that the adult potential victim does not consent to enter the NRM. The first responder should provide reasons for this decision in the free text box provided.

What happens to the DtN referral?

- o The Business Support Team (BST) in the SCA will review the referral carefully, focusing mainly on confirming that the individual is over 18 years old.
- o Unlike a full NRM referral, the DtN process has limited actions and tasks available for the BST – it is mostly for information and notifying the relevant police forces of DtN referrals.
- o If anything in the DtN referral suggests the potential victim should have been referred into the full NRM, the BST will contact the first responder to double – check that they are aware a DtN (not an NRM form) was submitted.
- o The main job for the Business Support Team is to identify the correct police force area⁶ and notify them that a potential victim of modern slavery has been identified.

⁶The BST uses the www.police.uk website to search for the correct force to send DtN referrals.

5. First responders

First Responder Organisations in England and Wales

A 'First Responder Organisation' (FRO) is authorised to refer a potential victim of modern slavery into the NRM. The current statutory and non-statutory First Responder organisations in England and Wales are listed below.

Statutory first responders have a legal Duty to Notify the Home Office when they suspect a person may be a victim of modern slavery or human trafficking. The current statutory first responder organisations are:

- o all police forces in England and Wales
- o all local authorities in England and Wales
- o UK Visas and Immigration / Border Force / Immigration Enforcement
- o National Crime Agency
- o Gangmasters and Labour Abuse Authority (GLAA)

Non-Statutory first responders do not have a legal Duty to Notify the Home Office when they suspect a person may be a victim of modern slavery or human trafficking. The current non - statutory first responder organisations are:

- o Salvation Army
- o Migrant Help
- o Medaille Trust
- o Kalayaan
- o Barnardo's
- o Unseen
- o NSPCC (Child Trafficking Advice Centre)
- o BAWSO
- o New Pathways
- o The Refugee Council

First responder duties

A first responder is an individual who works for an FRO and has the following responsibilities:

- o decide whether to refer a potential victim into the NRM using professional judgment and evidence available
- o explain **what the NRM is**
- o explain **what support is available in the NRM**
- o ensure that adult victims **understand** that by entering the NRM they are consenting to decisions being made about their case, for example Reasonable Grounds and Conclusive Grounds decisions
- o explain what the **possible outcomes** are for an individual being referred
- o seek **informed consent, if the potential victim is an adult**

- o make it clear that **information will be shared** or sought by the relevant competent authority from other public authorities, i.e. police and local authorities
- o **ensure the person is safe** and where appropriate consider:
 - contacting the police if you think a crime has been committed
 - referring to the local authority, non-governmental organisations (NGOs), local charities and the MSVCC
 - signposting to the NHS, local support organisations
- o contact the safeguarding team at the local authority where you suspect a child is a victim of modern slavery (**safeguarding responsibility**)
- o make a **referral to the Independent Child Trafficking Guardians** (ICTG) service where available (child potential victims only)
- o explain the reconsiderations process should a Negative decision be made at either Reasonable Grounds or Conclusive Grounds stage

How to ensure immediate safety

If you encounter a potential victim, you must ensure your own safety and the safety of the potential victim as first priority. Victims of modern slavery are a vulnerable group and should be treated with the same sensitivity as other vulnerable groups, such as victims of domestic violence.

If you identify a potential victim of modern slavery, you should follow your local authority's safeguarding procedures.

In most cases:

- o Where there is a risk of immediate harm to the potential victim, the police should be contacted by calling 999.
- o First responder organisations will share details of the appropriate Adult Social Care Team if the adult appears to have care and support needs
- o When the potential victim is a child, the local authority with safeguarding responsibility must be contacted (and the Independent Child Trafficking Guardian (Barnardo's) in certain areas).
- o All victims, including potential victims of modern slavery who are under the age of 18 must be referred to Children's Social Care urgently under child protection procedures⁷.

⁷ Please see the statutory guidance on multi-agency working to help, protect and promote the welfare of children in England- [Working together to safeguard children - GOV.UK](#). Please see [Safeguarding Wales](#). for information about safeguarding adults and children in Wales.

6. Identifying potential victims of modern slavery

To identify a potential victim of modern slavery, first responders should know and understand the signs which may indicate a person is a victim and decide whether a case should be referred to the NRM.

A first responder's decision as to whether to refer is a decision of professional judgment based on the evidence available to them. First responders should take into consideration any indicators of modern slavery.

It is also important to note that the potential victim might have been in more than one exploitative situation and the First Responder needs to explore and provide details of each exploitative situation where this information is available.

Some potential victims may recognise themselves as a victim of modern slavery. However, sometimes they do not identify as such. This could be due to fear of speaking out or not realising that they are in an exploitative situation. Potential victims may not trust government and authorities, this could be due to previous negative experiences of being let down by services, or due to worries about retribution for crimes they were forced to commit or an uncertain immigration status.

Here are some examples of indicators of modern slavery. **This list is not exhaustive**, and a more detailed list can be found in [Annex A](#).

Physical indicators of modern slavery:

- o Have tattoos or other marks indicating 'ownership' by their exploiters
- o Sustain injuries that suggest they were caused to enforce control or restrict freedom
- o Injuries of a sexual nature – including injuries to genitals (male and female), anus or breasts
- o Sexualised clothing held by girls under the age of 18

Behavioural indicators of modern slavery:

- o Show signs that their movements are being controlled. For example, trafficker accompanying victim to places, such as appointments
- o Using more than one phone
- o Suddenly acquiring expensive gifts– even drugs – and not being able to explain how they came by them
- o Being secretive about who they are talking to and where they are going

Circumstantial indicators of modern slavery:

- o Be unable to leave their work environment or home environment (beyond physical restrictions)
- o Receive little or no payment.
- o Live in poor or substandard accommodations
- o Work excessive hours

7. How to conduct trauma-informed interviews

This chapter focuses on how to conduct trauma-informed interviews with potential adult victims. In most cases, information gathering with children around their exploitation does not take place by way of a formal interview. The approach with potential child victims should be more child centred (please see section 9 of this document for more information).

It is important to gain as much information as possible from a potential victim when completing the NRM referral. In some cases, an interpreter may be needed. Your organisation will have a process which can be followed to ensure an interpreter is available.

Interpreters

- o Do not use any person accompanying the potential victim as an interpreter.
- o Where safe to do so, a potential victim should be spoken to in private, away from anyone accompanying them, including a social worker or support person.
- o Be aware - people claiming to be friends or supporters should **not** be used as formal interpreters, as they could be involved in the potential victim's exploitation and continue to exert control over them.
- o The role of the interpreter must be explained to the potential victim, reinforcing their code of conduct to the potential victim.

You should follow good practice. This includes:

- o Where possible, potential victims should be given a choice over the gender of their interpreter.
- o Interpreters should never be left alone with a potential victim, and those working with interpreters should ensure no unmonitored communication takes place.
- o Potential victims and interpreters should leave the session at different times.
- o Those working with interpreters should be wary of any interpreting activity that is out of the norm or not in keeping with what is being asked to be interpreted.
- o If a potential victim appears distressed in the presence of an interpreter, the session should cease immediately.

Safe space

- o Creating a safe environment may contribute to eliciting further indicators of modern slavery from the potential victim which were not obviously present at the initial encounter.
- o Trauma can cause people to forget detail / recount a story with inaccuracies - it should not be assumed that they are not telling the truth.
- o Additionally, by ensuring the victim feels safe, they are more likely to understand what the NRM is and what support is available to them

Taking the following into consideration may assist you to create a safe environment.

Surroundings:

- o Is the room private?
- o Is the room calm?
- o Is the room comfortable?

- o If needed is there a children's playroom available?
- o Are there too many people in the room?
- o Is there anything that could be re-traumatising to the individual? Could anything about the setting remind them of their traumatic experiences?

Communication:

- o Introduce yourself and your role
- o Inform them about how you can help
- o Give assurance that they are in a safe place
- o Use open-ended questions
- o Do they have a gender preference for the interpreters?
- o Can you gather information needed over a series of shorter meetings?
- o Ensure that there is enough time between meetings for the individual to rest.
- o Ensure you have understood the information being provided
- o Avoid language that could sound accusatory or that they have done something wrong / put themselves in a certain position. To that end, be mindful of tone of voice and body language.
- o Be sensitive to diverse backgrounds. Consider cultural differences and how this could affect how they speak / open to a certain gender / culture.
- o At the end of the meeting, ask the individual whether they wish to say anything else about their situation, and invite them to contact you later if they have forgotten to say something or want to add anything

Wellbeing:

- o How are they feeling?
- o Are they in dirty clothes? FRs should contact the relevant support team within their organisation to offer appropriate care
- o Are they hungry or tired? FRs should contact the relevant support team within their organisation to offer appropriate care
- o Are they frightened of being in trouble, or of being found by the traffickers?
- o Are they anxious they will be deported, or have committed an offence?
- o Offer regular breaks during meetings

Remember - if an individual does not consent to the NRM initially, it is better to record that they "didn't feel able to accept support at this time" rather than saying they did not want support.

It is important to recognise that it can take time for someone to develop enough trust in someone / something / a system that they feel able to open up and accept support.

The Modern Slavery & Exploitation Helpline can provide guidance and support to those who are not ready to consent, this is: **08000 121 700** (please see section 10 of this document for further information)

8. How to explain the NRM form and process

The safety, protection and support of the potential victim must always be the first priority. There are different referral processes for adult and child victims.

Be mindful that both adults and children may not consider themselves a victim, so it is important to ensure that the conversation is non-judgemental and allows them to share their views.

You may want to use visual images to assist understanding, particularly with those who do not speak English as their first language.

Potential adult victims

Suggested lines to use with potential adult victims (please see section 10 of this document for more information about the support available in the NRM):

- o From what you have told me today, it seems you might have experienced modern slavery (explain modern slavery), I will first explain to you what the NRM is and answer any questions you have about your referral into the NRM...
- o Provided you give consent I am going to refer you into the NRM.
- o If you give consent, once an NRM referral is submitted, the competent authority (explain who they are) will then aim to make a reasonable grounds decision (explain) within 5 working days wherever possible and if they make a positive decision, you will be given a [30 day] recovery and reflection period where you can access support including accommodation, financial assistance, medical care / counselling and legal advice. To be clear, this does not mean you are guaranteed a decision as soon as the 30-day period is over.
- o After that the appropriate competent authority will then make a decision about whether you are a victim of modern slavery and if you can continue accessing support.
- o There are different options on the referral form, and I will explain each one before I ask you to consent and it is up to you which options you choose.
- o I will explain what is covered on the Privacy Information Notice and how your data will be used.
- o First of all, there is the choice of whether you want to be referred into the process with access to the support I mentioned earlier or whether you don't feel you can at this time / whether you would prefer not to now.
- o The police will also be notified of your case and then you have the option to engage with them further about the incident.
- o You don't have to speak with the police. You can still have support even if you choose not to speak with the police.
- o Do you understand? Do you have any questions?
- o Do you consent to being referred into the NRM?

Potential child victims

There is no 'one size fits all' approach when speaking with potential child victims. Best practice for children's social care is to keep children informed of what is happening using

trauma-informed and age-appropriate methods of communication in a language that they fully understand.

Suggested lines to use with potential child victims (please see section 11 of this document for more information about the support available in the NRM):

- o My role is to make sure that you are safe and support you to understand what will happen next.
- o Everyone under the age of 18, who we are worried has been exploited, is referred into the NRM. I will explain what it means to be entered into the NRM and what support / help is available to you.
- o Do you understand?
- o Do you have any questions about the NRM?
- o In order to make your referral I'll need to ask you for some details about what happened to you. Is it ok to do that now or would you prefer me to speak to you at another time to do that?

9.Support for adult victims

All potential adult victims referred to the NRM have the option to access specialist government support but there is no obligation for them to accept it - **support is consent based**.

In England and Wales, this support is available through the Modern Slavery Victim Care Contract (MSVCC), which is managed by The Salvation Army (The Salvation Army referral helpline is 0800 808 3733, 24 hours a day, 7 days a week). You should make an immediate referral to The Salvation Army if the potential victim is destitute or does not have any safe accommodation, who will assess, taking into account the first responder's expert opinion if emergency support prior to a Reasonable Grounds decision is necessary.

If the potential victim consents to support in England and Wales but does not have a contact number, if possible, you should call The Salvation Army to help facilitate contact between them and the potential victim so that they can be smoothly entered into support.

Depending on the potential victim's circumstances, support may include accommodation, financial support and access to a support worker who will help them access essential services such as NHS medical care and legal representation, including where applicable through Legal Aid. This support is available to potential victims with a positive Reasonable Grounds decision at least until their Conclusive Grounds decision.

Details of the Scotland and Northern Ireland separate support arrangements can be obtained via the contacts below:

Scotland

- o Trafficking Awareness Raising Alliance (TARA) (female victims of sexual exploitation) 0141 276 7730 (working hours) and 0141 276 7724 (out of hours)
- o Migrant Help (male and female victims) 0141 884 7900 (working hours) and 0141 212 8553 (out of hours) traffickingscotland@migranthelpuk.org

Northern Ireland

- o Migrant Help (male victims of labour exploitation; female victims of labour exploitation can also be assisted if accompanying their male partner who is a victim of labour exploitation) 02890 315744 (working hours) or 02892 448449 (out of hours) northernireland@migranthelpuk.org
- o Belfast and Lisburn Women's Aid (female victims of any exploitation) 028 902662385 heather.woods@blwa.cjsm.net

You should explain the support that is available to the potential victim and ensure they are not pressured into making a quick decision about whether they want to be referred for support. You should also provide them with all the necessary information, including written

information (leaflets) where available, to allow them to make an informed decision in the future. It is important that the potential victim is given time to think and not be rushed into making a decision, if they are not ready to do so.

Even if the potential victim does not consent to receive support, they are still entitled to access emergency medical care and support through the NHS and, depending on their immigration status, may be able to access local authority housing support, benefits and/or asylum support. If an individual does not consent to enter the NRM there is a chance they may change their mind in future.

The Modern Slavery & Exploitation Helpline can provide guidance and support to those who are not ready to consent: **08000 121 700**.

10.Support for child victims

First responders have a duty to complete a number of actions when a potential child victim of modern slavery is identified.

1. Refer the child to the Local Authority Children's Services.

Local Authorities are the primary service provider for safeguarding and responding to the needs of a child victim of modern slavery, regardless of their nationality or immigration status. Whatever form it takes, modern slavery and child trafficking is child abuse and First responders must as per child protection procedures immediately contact Local Authority Children's Services when a potential or confirmed child victim is identified.

2. Refer the child to the ICTG Service⁸, where applicable.

The first responder must complete the dedicated ICTG Service online referral form available in [English](#) or [Welsh](#), which alerts the ICTG Service to a child who has potentially been trafficked and provides them with details of the child. The provision of an ICTG does not reduce the responsibility of the Local Authority to support and safeguard the child. ICTGs provide modern slavery specialist support in addition to the LA.

3. Refer the child to the NRM, via the online referral form.

Child victims do not have to consent to be referred into the NRM and must first be safeguarded and then referred into the NRM process.

Presumption of age: If you have reasonable grounds to believe that a potential victim is under 18, you should proceed as if they are. Further age verification may occur later by the responsible local authority⁹.

Be alert to children approaching 18th birthday and highlight this to the Local Authority and ICTG Service, so that they can assist in preparing the child for the requirement to provide signed consent to the SCA upon turning 18 to remain in or withdraw from the NRM and access MSVCC support.

Child self-identification

Like victims of other forms of child abuse, a child who is a victim of modern slavery will describe behaviour that has to be assessed against indicators of child abuse and modern slavery. Children may not be familiar with the words 'slavery' or 'trafficking' or be able to label their experience as abuse.

⁸ Sections 45 - 60 of the [Interim guidance for ICTGs](#) includes a full list of areas covered by the ICTG service.

⁹ Section 51 of the [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) - GOV.UK](#)

If a child referral is made where no indicators are present, the SCA may ask frontline staff to make additional enquiries as appropriate, to understand what concerns led to the referral being made.

1. Children may not see their experiences as 'trafficking' or 'slavery' and may use more colloquial terms. Also, they may see how they have been treated as normal in their culture or family.
2. Alternatively, children may refer to some experiences as 'trafficking' which are more like smuggling or simply travel arrangements.

Be aware potential child victims may not be willing to provide information, descriptions, or not see themselves as a victim.

Devolved decision making pilot

The pilot forms part of a wider programme of activity to identify sustainable longer-term options for the NRM. The purpose of the pilot is to test whether determining if a child is a victim of modern slavery within existing safeguarding structures is a more appropriate model for making modern slavery decisions for children.

The pilot launched in 2021 and expanded in 2023. There are currently twenty pilot sites across the UK, covering a total of 30 local authorities.

The pilot does not change the process for referring a child into the NRM. Once referred to the NRM, a child will enter the pilot if they are the safeguarding responsibility of a local authority involved in the pilot and are more than 100 days from their 18th birthday.

The decision on whether they are a victim of modern slavery will then be made by a multi-agency panel comprising of representatives from the local authority, local health service and the police. The ICTG Direct Worker or ICTG Regional Practice Coordinator must also be invited and provided with the opportunity to take part in all meetings and discussions which relate to and impact upon the child.

Decisions taken through the pilot are decided against the same frameworks as decisions made by the SCA and IECA.

11. What should the NRM referral include?

When you make an [online referral](#), you are required to fill in all relevant details about the victim, contact details for yourself and as much information as you can about the exploitation. **Please note, it is one referral per person**, even in the case where there are siblings or a family involved, each member of the family needs to be separately referred.

You will also be asked to include personal details about the potential victim, where they were exploited, where they are currently located, who exploited them and how they were exploited. Additional information such as crime references, Home Office references and the requirement of interpreters are also requested.

It is vital that the competent authorities are provided with accurate information and detail as they rely on this information to identify the relevant third parties involved in the potential victim's case, i.e. current location and addresses are used to confirm the relevant Police Force who would be responsible for investigating the modern slavery offence.

Essentials include:

- o full name, date of birth, nationality
- o language spoken
- o if available, a full address – and whether address is safe
- o **safe contact information** - a safe telephone number and email address¹⁰ for correspondence, any other means of contact (see below for what to do if there is no contact information). To note, this should be the potential victim's details and **not** that of a friend or family member (be mindful that they may share details of their exploiter instead, for example, out of fear)
- o how the potential victim was encountered
- o **details of exploitation** – what, where and when (ensure you provide details covering parts A, B, and C of the modern slavery definition)
- o **professional judgement**
- o **the full list of modern slavery indicators** that the first responder has identified in the potential victim's account and demeanour (please see Annex A for the list of modern slavery indicators)
- o first responder contact details (and an alternative contact for the competent authorities to contact in first responder's absence)

Desirable information includes:

- o any other names used

¹⁰ Please explain to the potential victim that they will receive an email from the relevant competent authority to verify their email address.

- o immigration status
- o vulnerabilities – any medical/mental health conditions or other further vulnerabilities that may require safeguarding
- o supporting evidence – behaviour, appearance, working conditions, demeanour, movements in UK (including dates)
- o agent – name of agent, exploiter, or trafficker
- o victims – name of any other victims
- o action taken - any action taken including referral to other agencies (for example The Salvation Army, police, UK Visas and Immigration) where appropriate
- o reference numbers - Home Office, Police, NRM, National Insurance
- o contact between the first responder and potential victim – for example, confirm if there was safe space to ask questions and was the victim given opportunity to provide detailed account of their situation?

Remember: you will need to provide contact details, for yourself AND for someone who can deal with the case in your absence (do not use group email addresses), as sometimes you may be contacted by decision-makers for clarification purposes or to provide further evidence.

Supporting evidence

To aid the referral process, the first responder should provide all objective evidence, including but not limited to:

- o Eyewitness testimony (if available)
- o Medical or expert reports
- o Details of any additional vulnerabilities
- o Travel records
- o Police investigations
- o Supporting evidence of the person's exploitation, such as:
 - External indicators observed by the first responder during their meeting with the individual

First responders should consider the presence of **any** indicators of modern slavery, including, for example, the non-verbal presentation of the victim, what the potential victim says, situational and environmental factors and objective evidence regarding known patterns of modern slavery (please see section 7 of this document).

It is important that the First Responder provides as much information as possible at the point of referral, including their record of external indicators. A First Responder's decision as to whether to refer a potential victim into the NRM is a decision of professional judgement based on the evidence available to them.

Where you have documentation, photographic or other evidence, you should outline these in your referral form, explaining what they are, including date and content, rather than saying 'see attached' (more information in section 12). Please do not send any explicit photography

in relation to sensitive topics like sexual violence. It is important to maintain respect and sensitivity towards potential victims of modern slavery and human trafficking.

The competent authorities may request additional information at a later stage. Therefore, First responders are required to fill in all relevant details about the potential victim, First Responder contact details including of an alternative contact, and as much information as possible about the exploitation.

Please note, you will now have the ability to upload supporting evidence¹¹ and documents within the body of the NRM referral form.

Remember- not all indicators of modern slavery will be present in all situations therefore it is helpful to the competent authorities to understand the concerns of the first responder, which led to the referral being made.

Quality of referrals

The following factors will assist you in completing a good quality NRM referral. It is important to ensure that all factors are included into the NRM form you complete, for the best outcome for the potential victim. To reduce the chance of completing a low quality referral, ensure that you have all of the information needed to complete the form. To help, this NRM [prompt sheet](#) can be downloaded and worked on offline.

Features of good quality referrals:

- o As much detail as possible (any reasons for lack of detail)
- o Professional opinion
- o Details of all modern slavery indicators observed in the individual's account and demeanour
- o Circumstances of the referral
- o Any reasons why account may appear inconsistent
- o Clear narrative of what happened - chronology of events
- o Any reasons for delay in disclosure
- o Contact details for first responder and alternative first responder
- o Clear if other evidence is available

Features of low quality referrals:

- o Lacking in detail – brief summary of the potential victim's account
- o Information that is 'copy and paste from other materials or referrals
- o No indicators provided even when they are present
- o No explanation or reasons for lack of detail, inconsistencies, timing of claim issues
- o No info to explain why potential victim has been referred in or details about circumstances of the referral
- o Not easy to follow
- o Personal opinion that could stem from unconscious bias instead of factual information

¹¹ Please note the size limit for individual files is 25MB, and there's a cap of 100 files in total evidence being uploaded.

Here are some of the key items to check before submitting the form:

- o If the potential victim is 18 years or older, have they given informed consent to be referred into the NRM process?
- o If the potential victim is 18 years or older, have they given informed consent to receive support?
- o Have you explained how and with who the information may be shared?
- o Have you explained the potential outcomes?
- o Have you provided an opportunity for the potential victim to reflect on what they have shared with you?
- o Have you ensured the potential victim's details are correct?
- o Have you included your (and an alternate) contact details?
- o Have you carried out a data quality assurance to check that you have provided all the required information?

12. The decision-making process of the NRM

As mentioned above, the SCA and IECA are the two Home Office Competent Authorities empowered to make decisions regarding whether an individual is a victim of modern slavery / human trafficking. They work together to ensure their service to potential victims of modern slavery/human trafficking is consistent, high-quality and effective – please see **Annex B**.

Outcomes for adult victims

To be aware, once the form is submitted, the referral will be validated by the competent authority staff. They will check whether the referral is a duplicate or refers to an existing case.

- o If the referral is found to be a duplicate of an existing case that is still outstanding, the competent authority staff will also include the information provided by 'new' first responder's information. Both the 'new' first responder and the original first responder will be notified of the outcome of the decision.
- o If the referral is a duplicate of an existing case that has already been assessed, the 'new' first responder will be informed that this is a duplicate case. If notifications have also been sent to other stakeholders, they will also be informed that the case has been identified as a duplicate and will now be treated under a different case reference. All relevant first responders will be kept updated on the progress of the case and all incidents will be covered in the existing NRM case.

The threshold for an RG decision is met when the decision maker agrees there are reasonable grounds to believe, based on all available general and specific evidence but falling short of conclusive proof, that a person is a victim of modern slavery. Following a positive RG, potential victims will be provided with a recovery period of at least **30 calendar days**. Please note, a recovery period will not be observed where a public order or bad faith disqualification has been applied¹².

The threshold for a CG decision met whether on the balance of probabilities there are sufficient grounds to decide that the individual is a victim of modern slavery. Following a positive CG, victims will receive a minimum of **45 calendar days** of move-on support and a Recovery Needs Assessment will be conducted.

Following a negative CG decision, the individual will receive move-on support for up to **14 working days**.

¹² For more information on public order disqualification decisions, please see section 7.8 of the [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) - GOV.UK](#)

Outcomes for child victims

With the exception of children in scope of the Devolved Decision-Making Pilot, all decisions for children will be undertaken by the SCA.

If a child meets the criteria to have their decision made by a Devolved Decision-Making Pilot panel, a multi-agency panel comprising of representatives from the local authority, local health service and the police will make this decision.

- o All negative decisions made through the Devolved Decision-Making Pilot are reviewed by the SCA before they are served. Local Authorities whose decisions have met the required performance standard are not required to have all positive decisions reviewed, although a sample of their positive cases will also be checked.
- o The Home Office currently quality assures and serves all decisions made by pilot sites. The standout benefits of the pilot include remarkably quicker CG decision-making timescales, an increased awareness and understanding of the NRM process and modern slavery within local authorities and improved multi-agency partnership working ensuring a range of professional voices are used to inform decisions.

Local authorities are the primary service provider for safeguarding child victims and must follow child protection procedures if modern slavery is suspected. Local safeguarding partners (local authorities, police and clinical commissioning groups) have a duty to work together to safeguard and promote the welfare of children including child victims of modern slavery.

Alongside this statutory support, ICTGs can provide support to children during the NRM process, and up until the age of 18 if the child has received a positive conclusive grounds decision (as per section 11).

13. The NRM Reconsideration Process

A reconsideration request allows an individual, or someone acting on their behalf to challenge a negative RG or CG decision. A request for reconsideration should be submitted to the relevant competent authority that made the disputed decision within **30 calendar days**.

If the SCA issued the disputed decision, please email the reconsideration request to nrm@modernslavery.gov.uk. If the IECA made the disputed decision, please email the reconsideration request to TechnicalSpecialistsIECA@homeoffice.gov.uk,

A reconsideration request can be made if:

- o additional evidence can be provided which, taken with all the available evidence already considered, could demonstrate that the individual is a victim of modern slavery.
- o there are specific concerns that a decision made is not in line with guidance.

Since first responders play a key role in identifying, supporting and referring potential victims to the NRM, they should explain the reconsideration process and offer support in submitting a reconsideration request on the individual's behalf. First responders should also highlight to the individual's their right to submit a request themselves.

Remember - going through the reconsideration process can be stressful and retraumatising for potential victims. It may require them to revisit painful details or provide additional evidence, which can be emotionally difficult. Encouraging full disclosure early and informing individuals of their rights help make the process smoother, less traumatic and more effective.

Information to include in a reconsideration request

A reconsideration request must contain the following details:

- o Full name, date of birth, nationality
- o NRM reference number
- o Basis of request i.e., 'not in line with guidance' or 'new available evidence'
- o Reasons for the reconsideration request, including new available evidence where applicable.
- o Where new evidence is being provided, an explanation as to why this evidence was not provided earlier.

Examples of evidence likely to be relevant to a case includes, but is not limited to, the following:

- o Evidence from the police that the individual has been the victim of a crime of modern slavery.

- o A judgment from the Immigration & Asylum Chamber or other court/tribunal involved in immigration processes that an individual with a negative NRM decision is a victim of modern slavery.
- o A successful use of the statutory defence (section 45 of the Modern Slavery Act 2015) in court (see Annex H)
- o Evidence that provides possible explanations for inconsistencies in a potential victim's account of modern slavery e.g., a medical report detailing inability to provide a coherent account of their experience of modern slavery.
- o Factual evidence that demonstrates that one of the conclusions drawn by the competent authority is incorrect.
- o Evidence that suggests the guidance on making an RG or CG decisions have been followed incorrectly¹³.

The competent authority will first check if there are valid grounds to reconsider the decision. If so, they will look at the case again.

The competent authority can contact others (e.g. first responders) for more information. A request will not be rejected based on who submitted it. The competent authority must reply in writing, ideally within nine working days to confirm if they agree to reconsider. While waiting for a new RG or CG decision, the individual is considered a potential victim and may receive support, unless the competent authorities make a Public Order Disqualification decision.¹⁴

Extension requests

If new evidence becomes available after the 30-day timeframe, a request for an extension can be made to the relevant competent authority. The individual must ask for an extension as early as possible, explain why, and say when the information will be ready.

Please note, extensions are only granted in exceptional cases, such as:

- o if an individual is likely to be unable to obtain or provide information to the competent authority for reasons beyond their control;
- o if safeguarding concerns are present;
- o if an individual has recently left an exploitative situation, or;
- o for reasons to which the individual could not have reasonably foreseen.

Remember – support for individuals waiting for a response to their reconsideration request can be extended beyond the initial 14 day move-on support period.

¹³ Please see Annex E of the [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) - GOV.UK](#) for more details on the decision making process.

¹⁴ Sections 14.235 – 14.250 of the [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) - GOV.UK](#) covers information on Public Order Disqualification decisions

What if the decision is still negative?

Generally, only one reconsideration request will be considered by the relevant competent authority on the basis of specific concerns that a decision is not in line with guidance or on the basis of new available evidence. If the negative decision is upheld, it is final unless there are “good reasons”¹⁵ to request a further reconsideration.

Good reasons could include:

- o New, significant evidence
- o An explanation for why it was not submitted earlier

Further material provided as part of the “good reasons test” should also be timely and made as close to possible to any upheld decision of a negative RG or CG decision. It must be clearly evidenced with supporting detail and present substantially new insights to decision makers or First Responder Organisations that were not present in the primary reconsideration request.

Remember – if a first responder is preparing to leave their role, there should be a contingency plan in place to ensure the individual continues to receive support.

¹⁵ “good reasons” further explained in sections 14.232 -233 in the [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) - GOV.UK](#)

14. Further support and links

- o <https://www.modernslavery.gov.uk/start> - The online referral system is to be used for referrals into the NRM. Only staff at designated first responder organisations can make NRM referrals.
- o [Modern Slavery Statutory Guidance](#) - This guidance provides advice on how to identify and support victims, the NRM process and the criteria used to determine whether someone is a victim of modern slavery.
- o [Modern Slavery Awareness booklet \(publishing.service.gov.uk\)](#) - This guidance is aimed at a broad range of public sector staff who could potentially witness indicators of modern slavery.
- o [Interim guidance for independent child trafficking guardians](#) – This guidance covers roles and responsibilities of independent child trafficking guardians (ICTGs).
- o [2021 UK annual report on modern slavery](#) - This latest annual report contains an assessment of modern slavery in the UK and the UK's existing and future response to modern slavery.
- o [Child exploitation and abuse: an appropriate language guide](#) - The Children's Society's guide on the appropriate use of language when discussing children and their experience of exploitation in a range of contexts.
- o [Spot the signs | The Salvation Army](#) - The Salvation Army provides specialist support to protect and care for all adult survivors of modern slavery in England and Wales through a government contract which was first awarded in 2011
- o [NRM Explanatory Booklets](#) - The West Midlands Anti-Slavery Network has developed a multilingual document detailing the NRM process for first responders in the region.
- o [The Slavery and Trafficking Survivor Care Standards 2018](#) - Guidance on best-practice standards for meetings with and supporting survivors of human trafficking and modern slavery
- o [Trauma-Informed Code of Conduct](#) – This report is by the Helen Bamber Foundation for all professionals working with survivors of human trafficking and modern slavery
- o [Guidance for councils on modern slavery](#) – This revised modern slavery guidance provides an overview of modern slavery and the UK framework for tackling it, and provides targeted sections for officers working in different council services to help them understand their specific responsibilities.
- o [Modern slavery – Coventry City Council](#) – General indicators of modern slavery identified by the Coventry City Council.

Important contact details:

- o Immigration Enforcement Competent Authority:
IECompetentAuthority@homeoffice.gov.uk
- o Single Competent Authority: nrm@modernslavery.gov.uk
- o The ICTG Service has a phoneline 0800 043 4303 which is available 24 hours a day, 7 days a week, 365/6 days per year.
- o Modern Slavery Helpline - 08000 121 700

Annex A: General indicators of Modern Slavery

The Home Office is aware that most first responder organisations will have their own set of modern slavery indicators. This list is not exhaustive and is intended for general awareness only.

General Indicators – Victims may:	
<ul style="list-style-type: none"> o Believe that they must work against their will o Be unable to leave their work environment or home environment o Show signs that their movements are being controlled o Feel that they cannot leave o Show fear or anxiety o Be subjected to violence or threats of violence against themselves or against their family members and loved ones o Suffer injuries that appear to be the result of an assault o Suffer injuries or impairments typical of certain jobs or control measures o Suffer injuries that appear to be the result of the o application of control measures o Be distrustful of the authorities o Be threatened with being handed over to the authorities o Be afraid of revealing their immigration status o Not be in possession of their passports or other travel or identity documents, as those documents are being held by someone else o Come from a place known to be a source of human trafficking o Have had the fees for their transport to the country of destination paid for by facilitators, whom they must pay back by working or providing services in the destination 	<ul style="list-style-type: none"> o Have false identity or travel documents (or none at all) o Be found in or connected to a type of location likely to be used for exploiting people o Be unfamiliar with the local language o Not know their home or work address o Allow others to speak for them when addressed directly o Act as if they were instructed by someone else o Be forced, threatened or deceived into working in poor conditions o Be disciplined through punishment o Be unable to negotiate working conditions o Receive little or no payment o Have no access to their earnings o Work excessively long hours over long periods o Not have any days off o Live in poor or substandard accommodations o Have no access to medical care o Have limited or no social interaction o Have limited contact with their families or with people outside of their immediate environment o Be unable to communicate freely with others o Be under the perception that they are bonded by debt o have signs of physical or psychological abuse or neglect o Have acted on the basis of false promises