

# **Council guide to tackling modern slavery**

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# How to use this guidance

This guidance has been developed to assist a wide range of council services and officers, including:

- services working directly with victims (such as social care and housing teams)
- services where officers may come into contact with victims (such as regulatory/ environmental services)
- corporate services that have a role to play supporting councils' work on modern slavery, for example legal or communications teams.

The guidance comprises a number of core introductory sections for all services and officers, followed by sections aimed at those working in specific services. The table below identifies the sections which different officers may find most helpful to review.



If you are a...	...you are advised to review these sections
Council senior officer	5 6
Service head	3 4 5 6
Modern slavery/corporate lead officer	all sections
Children's services teams, youth offending teams	2 3 4 5 6 7 A1
Adult safeguarding/social care teams, substance misuse teams	2 3 4 5 6 8 A1
Housing/homeless teams	2 3 4 5 6 9 A1
Community safety officer	all sections
Regulatory and environmental services teams	2 3 4 5 6 11 A1
Legal teams	2 3 5 6
Communications teams	2 3 4 5 10
Customer services teams	2 5 A1
An officer commissioning or procuring services	2 5 12
Portfolio holder/councillor lead	2 3 4 5 6

Sitting alongside the guidance is a '**maturity matrix**' which councils can use to assess their current progress on modern slavery work, with suggested next steps to aim for.



# Foreword

In 2017, the Local Government Association (LGA) worked with the Office of the Independent Anti-Slavery Commissioner to develop the first council guidance on tackling modern slavery. The development of the guide followed a presentation by the first Commissioner, Kevin Hyland OBE, to the LGA's Safer and Stronger Communities Board, setting out the scale of modern slavery in the UK and how it can affect communities everywhere.

Since the publication of the guidance, trends in modern slavery, and councils' responses to the issue, have developed further. Council referrals of suspected victims of modern slavery have increased significantly, reflecting both the devastating trend of criminal exploitation of children in our communities but, more positively, also greater awareness and understanding of the issue. We have seen increasing numbers of councils identifying modern slavery lead officers and participating in local anti-slavery partnerships, as well as improving responses to victim support.

However, there is still more to do to ensure our response to slavery and its victims is as good as it can be. Notwithstanding the challenges that can impair our response – whether that is victim reluctance to disclose information about their experience or resource and capacity pressures – we have a moral obligation to ensure a humane and compassionate response to people left traumatised by appalling abuse.



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Achieving this consistently across the whole of local government requires still wider awareness of the issue, and a clear understanding of the steps that councils need to take in response to it. This refreshed guidance is intended to support these objectives.

Alongside an overview of modern slavery and the UK framework for tackling it, the revised guide builds on the original document by providing targeted sections for officers working in different council services, to help them understand their specific responsibilities, and incorporates learning identified over the last five years from councils and other organisations working to tackle slavery.

In a speech on slavery to the House of Commons in 1791, William Wilberforce famously closed his remarks by saying: “Having heard all of this you may choose to look the other way, but you can never say again that you did not know.” More than 200 years later we cannot look the other way, but must ensure that all of our authorities are well equipped and active in tackling this abhorrent crime.

## Councillor Nesil Caliskan

Chair, LGA Safer and Stronger Communities Board



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## 2. Modern slavery – an overview

### What is modern slavery?

Modern slavery is an umbrella term encompassing slavery, servitude, forced or compulsory labour and human trafficking.

The Equality and Human Rights Commission provides the following definitions:

- Slavery is when someone actually owns you, like a piece of property.
- Servitude is similar to slavery – you might live on the person's premises, work for them and be unable to leave, but they don't own you.
- Forced labour means you are forced to do work that you have not agreed to, under the threat of punishment.

Some, but not all, cases of modern slavery will involve human trafficking. Human trafficking is when men, women and children are moved and forced into exploitation: the movement could be international but also within the country, from one city to another or even just a few streets. A person is a victim of human trafficking even if they have not yet been exploited but have been moved for the purposes of exploitation.



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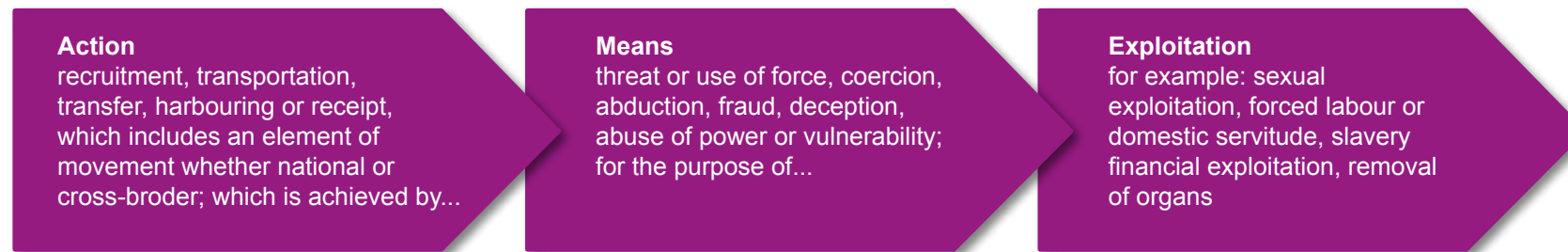
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The Government's 'Statutory guidance for England and Wales (under section 49 of the Modern Slavery Act 2015) and non-statutory guidance for Scotland and Northern Ireland' (the statutory guidance) highlights the necessary components for human trafficking cases: the action, means and exploitation. These are important to understand and demonstrate when making referrals about suspected cases of modern slavery.



Section 69 of the Nationality and Borders Act 2022 gives the power for the Government to legally define the meaning of a 'victim of slavery' and 'victim of human trafficking' for the purpose of the modern slavery provisions under Part 5 of the Act. The 'Slavery and human trafficking (definition of victim) regulations 2022' came into force on 28 July 2022.

## Types of exploitation

There are a number of different types of exploitation that victims of modern slavery may be subjected to, and victims may experience more than one type of exploitation at the same time. Again, the statutory guidance on the Modern Slavery Act provides a



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comprehensive overview of the different types of human trafficking and modern slavery; the Government also published 'A typology of modern slavery offences' in 2017, setting out 17 broad types of modern slavery offences. However, the most common forms of exploitation are:

- **Sexual exploitation:** victims may be forced into prostitution, pornography or lap dancing for little or no pay; sexual exploitation may also be non-commercial. Sexual exploitation can also be a feature of other types of exploitation, such as criminal exploitation or domestic servitude, and can take the form of grooming among children in particular.
- **Labour exploitation:** a victim is forced to work in poor working conditions with little or no pay, and may face violence or threats. If they are foreign nationals, their passports may be confiscated by their exploiters and they may be made to live in terrible conditions (often in houses of multiple occupancy) and under threat of violence (to themselves or family members in the UK or overseas); and also of being reported to the authorities if they have irregular immigration status, or being left destitute and homeless.
- **Forced criminality:** victims can be compelled to participate in a range of organised criminal activities including pick pocketing, begging, shop lifting, drug trafficking or cultivation, sham marriages, benefit fraud and or other similar activities which are subject to penalties and imply financial gain. Section 45 of the Modern Slavery Act provides for a statutory defence for victims who have been compelled to commit crimes as a result of their exploitation (in the case of adults) or who have committed a crime as a direct result of being a victim (in the case of children). The defence does



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not apply to the most serious crimes, such as sexual offences, some terrorism offences or offences involving serious violence (as outlined in Schedule 4 to the Modern Slavery Act 2015).

- **Domestic servitude:** victims work in a household where they may be ill-treated, humiliated, subjected to exhausting hours, forced to work and live under unbearable conditions, or forced to work for little or no pay. There may often be overlaps between domestic servitude and forced marriage, sexual exploitation and domestic violence.
- **Debt bondage:** can be present in many forms of exploitation and can take a range of forms. Debts may arise out of the exploitation itself, for example in relation to accommodation or travel fees, with victims having little or no control over their debt and little or no way to pay it back. Costs may be deducted from their wages, leading to further debts being accrued. A person may be forced to work to pay off the debt and it can also be used as a means of controlling a victim and keeping them enslaved.
- **Organ harvesting:** victims are trafficked in order for their internal organs (typically kidneys or the liver) to be harvested for transplant. While kidneys or the liver are commonly traded, any organ that cannot regenerate and can be removed and re-used could be the subject of this illegal trade.

Modern slavery may include aspects of financial exploitation such as: bank accounts being opened in a victim's name but used by perpetrators; workers' wages being paid directly into the exploiter's own bank accounts by companies that think they are paying an individual worker; welfare benefit fraud; and identity fraud, with bank accounts being opened, loans and mobile phone contracts taken out in a victim's name.



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The statutory guidance also sets out examples where it may be unclear whether a case involves an element of trafficking or modern slavery, for example forced or sham marriages and illegal adoption.



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**Key issues to be aware of:**

- People can be victims of modern slavery even when they have apparently consented, as consent can be obtained by coercion.
- Coercion can also mean that victims don't take opportunities to escape. Despite this, they are still victims.
- Exploitation doesn't need to have taken place yet for individuals to be victims, for example if their abusers are caught before the exploitation takes place – what matters is the purpose for which they are being held.
- UK nationals can be victims of modern slavery: in 2021, there were more recorded British victims of modern slavery than of any other nationality.
- People can be victims of human trafficking even where they have only been moved within a country.
- Modern slavery victims could be related to or in a relationship with their abusers, for example if they are being groomed.
- Victims of modern slavery might say that they have a better situation than previously – for example if they were homeless prior to exploitation and have been given shelter as part of their accommodation, or are being paid more than in their home country despite their exploitation. However, this does not mean they are not victims of modern slavery.
- Human smuggling is not people trafficking: the statutory guidance outlines the differences between the two.



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## Victims of modern slavery

Anyone can become a victim of modern slavery, and in all types of exploitation victims can be women, men, girls or boys. Government figures showed that in 2021, of 12,727 potential victims referred to the National Referral Mechanism (NRM), the system for identifying and supporting victims of modern slavery, 77 per cent (9,790) were male and 23 per cent (2,923) were female; 43 per cent (5,468) claimed exploitation as children. This represents a 20 per cent increase in referrals compared to the preceding year.

For adult potential victims, labour exploitation was most often reported (33 per cent; 2,141 referrals), whereas child potential victims were most often referred for criminal exploitation (49 per cent, 2,689 referrals). Throughout 2020, a rapid increase in the identification of ‘county lines’ cases partially drove the increase in referrals for children within the criminal exploitation category. In 2021, cases flagged as ‘county lines’ have remained at this high level, averaging over 500 referrals a quarter.

‘County lines’ is the police term for urban gangs supplying drugs to suburban areas and towns using dedicated mobile phone lines – these are the county lines. It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money.

In terms of nationalities, this is a crime that affects British victims as well as those trafficked into the UK. Albania, Vietnam and the UK were the most common nationalities of the potential victims referred to the NRM in 2021. However, it is important to note the diversity of those found in or experiencing exploitative situations, as shown by 2021 data



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from [Unseen’s modern slavery and exploitation helpline](#) – which indicated a total of 3,019 potential victims from 76 different nationalities.

There is no single type of victim or pathway into modern slavery, and, in practice, it is not always easy to identify a potential victim. For a variety of reasons, potential victims may be reluctant to come forward with information, not recognise themselves as having been trafficked or enslaved, or tell their stories with obvious errors and/or omissions. Annex one of this document includes a summary on the potential indicators of modern slavery; these are also covered in detail in the statutory guidance on the Modern Slavery Act.

Exploitation is normally more prevalent among the most vulnerable or within minority or socially excluded groups, with certain groups recognised as particularly vulnerable to being exploited through modern slavery:

- unaccompanied, internally displaced children
- children accompanied by an adult who is not their relative or legal guardian
- young girls and women
- former victims of modern slavery or trafficking (see below).

Traffickers or modern slavery facilitators are also known to target vulnerable men, such as those with substance misuse issues, debts (in their country of origin or as a result of their illegal migration), mental health problems or learning disabilities.

A report by the Independent Anti-Slavery Commissioner, [‘Understanding and responding to modern slavery within the homelessness sector’](#), found that those who are homeless are vulnerable to rogue employers offering work and accommodation, and that victims



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of modern slavery could be at risk of destitution and homelessness, and therefore re-exploitation, if no long-term support is provided to them. Of those homeless organisations that participated in the research, 64 per cent reported coming across potential victims of modern slavery.

Victims of modern slavery have often been promised a better life or a legitimate job before they are exploited. By the time they find out that the reality is very different or the legitimate job does not exist, they are already enslaved. Some victims might not see that they have been exploited, or may feel that the life they are living is better than the one they might have lived previously, particularly if they have come from another country. Others may be too scared to seek help from the authorities because of the threats that they or their family have endured, because they have been involved in criminal activities, because of their immigration status, due to a sense of misplaced loyalty to the perpetrators, or due to perceptions or experiences in their own country including corruption.

Victims might have been given a prepared story to use by the traffickers or modern slavery facilitators. They may also be aggressive or hostile to the authorities, fearful of them (which may have been instilled by the person exploiting them), or have difficulties in recalling what they have experienced as a result of trauma. Victims may have undergone 'juju' or witchcraft rituals which they would fear to break and which can be used to control victims. They may be threatened with or experienced violence, may be controlled through debt, or may have been groomed.



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## Perpetrators

Perpetrators of modern slavery can be serious and organised crime groups, but may also be an individual close to the victim – such as family members, friends, individual employers or partners. Different types of perpetrator are more likely to be involved in different types of exploitation. For example, domestic servitude in particular can be committed by individual perpetrators, often family, partners or family friends, who have promised a better life to the victim, deploying a range of techniques to exploit them such as monitoring, tied accommodation, restricting movement, financial control and physical abuse (although it may also be committed by people not known to the victim). In other cases a perpetrator may not know a victim but may engage with them about a job opportunity, such as in a factory, and use different methods of coercion to take the victim's money and control their lives.

National Crime Agency (NCA) estimates on the scale of modern slavery suggest that in 2021 there were between 6,000 and 8,000 modern slavery offenders in the UK. Modern slavery offending had moderately reduced but remained under-reported. COVID-19 restrictions led to some offending being displaced between exploitation types and labour sectors. For example, there was a displacement from service sectors, such as hand car washes, to other industries less affected by COVID-19 restrictions, such as factory work.

Previous research from the NCA found that the most prevalent offender nationalities in the UK were British and Romanian, with Eastern Europe the most cited wider region of origin. Offenders were most likely to target people from within their own nationality or ethnicity in the majority of cases, though British offenders targeted victims from a broad



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range of nationalities. The majority of crime groups involved in human trafficking were small with limited hierarchies, often predicated on familial or social links, although larger, more structured groups do exist.



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# 3. The UK framework for tackling modern slavery

The UK's response to tackling modern slavery was championed by former Prime Minister Theresa May, who as Home Secretary launched the 2014 modern slavery strategy, based on the '4Ps' approach of:

- **Pursue:** prosecuting and disrupting individuals and groups responsible for modern slavery.
- **Prevent:** preventing people from engaging in modern slavery.
- **Protect:** strengthening safeguards against modern slavery by protecting vulnerable people from exploitation.
- **Prepare:** reducing the harm caused by modern slavery through improved victim identification and enhanced support.

The Government has been working to refresh its modern slavery strategy, and an updated version is expected shortly.

Following the 2014 strategy, the landmark Modern Slavery Act was passed in 2015.



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Although the 2015 Act is the main domestic legislation setting out the UK's response to modern slavery, activity to support victims and disrupt trafficking is governed by a mix of domestic legislation and international conventions. The UK response has been heavily shaped by international laws, conventions and protocols which the UK has opted in to, ratified or is already bound by. Collectively, these laws and protocols set out agreed definitions and obligations on countries to identify and support victims:

- 1950 European Convention on Human Rights (ECHR)
- United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children (Palermo Protocol 2000)
- Council of Europe Convention on Action against Trafficking in Human Beings 2005 (European Communities Against Trafficking, or ECAT)
- EU Directive on Preventing and Combatting Trafficking in Human Beings and Protecting its Victims Directive 2011 (the Anti-Trafficking Directive).

Other international instruments with relevance include the UN Convention on the Rights of the Child 1989, and Convention on the Elimination of All Forms of Discrimination against Women 1981.

In terms of domestic legislation, as well as the Modern Slavery Act 2015, the Housing Act 1996, Children Act 1989, Care Act 2014 and Immigration Acts 2014 and 2016 all directly shape the response of councils and support that victims may be entitled to receive from councils, while the Crime and Disorder Act 1988 sets out the main framework under which councils are expected to disrupt criminal activity in their areas.



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### The Modern Slavery Act 2015

- consolidated and clarified existing modern slavery and human trafficking offences and increased the maximum sentences for committing these offences from 14 years to life imprisonment
- introduced slavery and trafficking prevention orders and slavery and trafficking risk orders – which can be used to disrupt activities by modern slavery perpetrators
- created the role of the UK Independent Anti-Slavery Commissioner and placed a duty on authorities, including councils, to cooperate with the role
- introduced support and protection for victims, including a defence for victims of slavery or trafficking who commit an offence and measures on the presumption of age of child victims of modern slavery
- introduced the role of independent child trafficking advocates, now referred to as independent child trafficking guardians
- introduced a requirement for certain businesses to produce and publish a modern slavery statement, setting out what they are doing to tackle modern slavery and trafficking in their supply chains.



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The Queen's Speech in May 2022 announced the Government's intention to introduce a Modern Slavery Bill, expected to extend supply chain reporting requirements to public authorities, enshrine the rights of victims of modern slavery under the UK's international commitments in domestic law, and ensure law enforcement agencies have stronger tools to prevent modern slavery occurring, protect victims of modern slavery and bring perpetrators to justice.

The Nottingham University Rights Lab have developed a [database setting out relevant international and domestic conventions and legislation governing modern slavery work.](#)

## National Referral Mechanism (NRM)

Shaped by the international conventions referenced above, the UK's framework for identifying and supporting modern slavery victims is called the National Referral Mechanism (NRM). There are six main stages to the NRM process for victims that enter it and are found to have been victims of modern slavery.



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Following identification, potential victims can be referred into the NRM by designated bodies known as first responders. Councils, alongside some other statutory bodies (including the police) and voluntary and community sector (VCS) organisations working with victims of modern slavery are first responder organisations.

Under section 52 of the Modern Slavery Act, specified first responders have a statutory duty to notify the Home Office when they come across potential victims of modern slavery. When indicators of modern slavery are identified by first responders, all suspected child victims should be referred into the NRM, as well as adults who give their consent to enter the NRM.

Where a potential adult victim has not provided their informed consent to be referred, first responders should still notify the Home Office, to help build up a good intelligence base about slavery. The online NRM portal can be used to refer individuals into the NRM and to make ‘duty to notify’ referrals. The system provides optional and mandatory fields to enable a referral to be submitted, and adult cases without consent automatically become duty to notify referrals.

Frontline staff are not expected to conclusively prove that someone is a victim of modern slavery. Instead, the duty of councils and other first responders is to identify people who they are concerned might be potential victims, based on the indicators, and refer them to the NRM. Referrals into the NRM are submitted to the relevant Home Office competent authority, the Single Competent Authority (SCA) or Immigration Enforcement Competent Authority (IECA). The IECA is responsible for a specific cohort of cases, broadly involving foreign national offenders or those in immigration removal centres, as set out at paragraph 4.14 of the statutory guidance.



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The competent authorities will initially consider whether people referred are potential victims of modern slavery: the threshold at this first stage is that of ‘I suspect but cannot prove’ that an individual is a victim of modern slavery. This is known as a ‘reasonable grounds’ decision and should be made, where possible, within five working days of a referral, although in practice it can take longer.

Where a reasonable grounds decision is negative, an individual will be exited from the NRM. If a reasonable grounds decision is positive, the potential adult victim will be entitled to a ‘recovery period’ of at least 45 days of support provided through the Modern Slavery Victim Care Contract (MSVCC). Through this they will have access to outreach support, safehouse accommodation where necessary (if they do not have other appropriate accommodation available, for example through the local authority), financial support, and access to a support worker to assist with accessing wider services such as healthcare, translation services and legal aid.

During this recovery period, the relevant competent authority will undertake further work to enable it to make a ‘conclusive grounds’ decision on whether there are sufficient grounds to decide that the individual being considered is a victim of modern slavery. In practice, it can take much longer than 45 days to make a decision confirming victim status at the conclusive grounds stage.

If adult victims receive a positive conclusive grounds decision, they are entitled to a minimum of 45 days of additional support and a tailored move-on plan to ensure smooth transition out of the MSVCC, where possible. A personalised recovery needs assessment (RNA) will be undertaken to identify the specific support needs an individual has.



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Individuals will only be exited from the MSVCC where they are able to. There is no overall time limit set for victims to receive support through the RNA process. MSVCC support continues, in part or in full, until a victim no longer has any recovery needs, or until other services (such as those provided by the NHS, councils or the Department for Work and Pensions) can meet their ongoing needs.

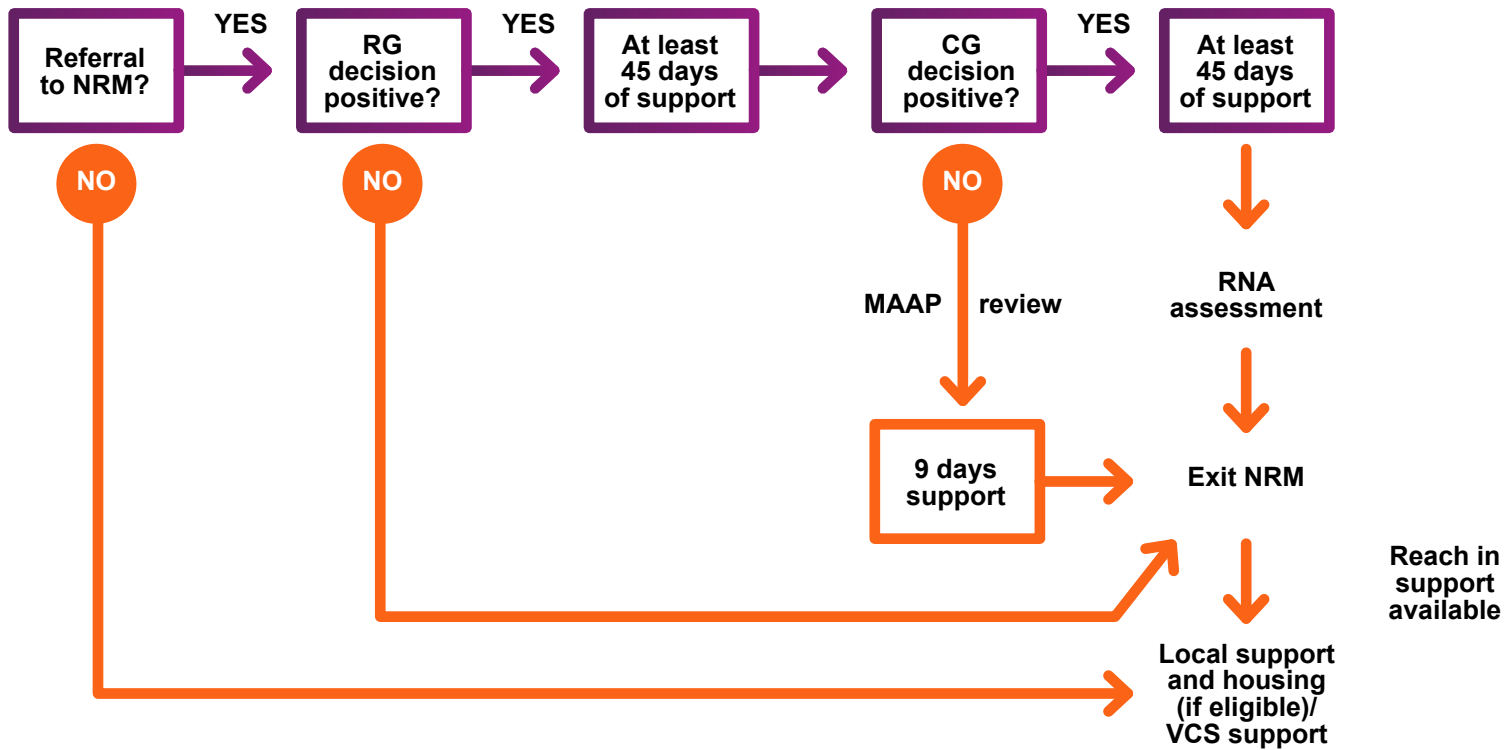
If the conclusive grounds decision is negative, individuals are entitled to a further nine working days of support before being required to exit the NRM/MSVCC. Negative conclusive grounds decisions are automatically referred to multi-agency assurance panels (MAAPs) for review. Although MAAPs cannot overturn decisions, they can ask for a case to be reviewed where they consider that either the decision has not been made in line with guidance or that further information may be required.

Once a victim has exited the main MSVCC support service, they may still access reach-in support if they have emerging or reactive requirements for support or advice.



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### Pathway through the National Referral Mechanism



**Key**  
**RG** reasonable grounds  
**CG** conclusive grounds  
**MAAP** multi-agency assurance panel  
**RNA** recovery needs assesment



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## Victim support and the national referral mechanism

The [statutory guidance](#) sets out the approach to supporting victims of modern slavery and principles of the MSVCC (see chapters eight and nine and annexes F and G specifically). The Home Office has contracted The Salvation Army to provide MSVCC victim care services across England and Wales through a network of sub-contractors, including its own direct delivery service. The Salvation Army has [produced a short guide to the MSVCC](#) which councils may find helpful.

For potential and confirmed adult victims in England, support is provided through a mixture of mainstream and / or specialist support, and will depend on the specific needs of individuals. For victims referred into the NRM, support can include:

- Access to Government funded supported through the MSVCC (including accommodation, material assistance, financial support, translation and interpretation services, information and advice)
- Outreach support if victims are already in safe, secure and appropriate accommodation (which may include local authority accommodation or asylum accommodation)
- Access to legal aid for immigration advice
- Medical care and counselling
- Assistance to return to their home country if not a UK national



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The guidance is clear that support provided through the MSVCC to those in the NRM process should not displace or prevent victims from receiving other support that they are entitled to. As is highlighted later in this guidance, victims may be entitled to access accommodation and other support from councils under different pieces of legislation. Therefore, councils should not assume that referring an individual into the NRM means that they will be solely supported under the MSVCC, nor that the council will not have to provide accommodation or other support to those in the NRM process: if the victim is entitled to receive this support, the statutory guidance is clear that they should do so unless there are specific reasons why MSVCC accommodation and support is more appropriate.

Ahead of a reasonable grounds decision being made, there can be specific challenges in supporting adult victims who are destitute/ineligible for council support and/or unable to access support elsewhere (paragraph 15.6 of the statutory guidance). The statutory guidance states that where a victim consents to entering MSVCC, safe accommodation can be provided from the day the first responder makes the referral into the NRM, under the MSVCC, by contacting The Salvation Army referral helpline on 0800 808 3733 (paragraph 15.7). Some local areas may also provide their own emergency pre-NRM/ interim accommodation at this stage.



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### Child victims and the NRM

The support process for child victims of modern slavery is different to that for adults, as all child victims should automatically fall under the remit of council children's services, who have a duty to safeguard children within their area, regardless of the immigration status of the child. Accommodation and outreach support provided through the MSVCC are therefore not available to children, who should be provided with equivalent necessary support at the local level.

However, where there is an independent child trafficking guardian (ICTG) service available, children referred into the NRM will be assigned an ICTG to advocate for them if there is no one in the UK who holds parental responsibility for them. ICTG regional practice coordinators are also available to support council and other local officers working with other child victims in the course of their roles. The ICTG model has been piloted over several years and is in the process of being rolled out across the country. The Home Office [interim guidance for ICTGs](#) sets out the areas where the model is currently operational.

The Government has also been piloting an approach to devolve child NRM decision making to local councils and their partners. Ten areas piloted the approach from 2021-22, with early findings suggesting that timely and robust decisions are being taken by local experts. The pilot aims to expand to more sites to further test this approach.



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**NRM: key statistics**

- During 2021, 12,727 potential victims of modern slavery were referred to the Home Office in Great Britain, a 20 per cent increase on the previous year. This is the highest number of referrals since the NRM was established in 2009.
- Of potential victims referred to the NRM in 2021, the most common nationality of all referrals was British, accounting for 31 per cent of all potential victims. Albanian nationals were the second most referred at 20 per cent of referrals, followed by Vietnamese nationals at 8 per cent.
- Councils accounted for 25 per cent (3,229) of referrals into the NRM, the vast majority of which related to children.
- Not all potential victims were referred to the NRM: 3,190 reports of potential adult victims were made via the duty to notify. Consequently, the true scale of modern slavery is hidden. Estimates range from a 2013 Home Office estimate of between 10,000-13,000 victims in the UK, to a 2018 Global Slavery Index estimate of 136,000 victims in the UK.
- In 2021, the Home Office made 12,665 reasonable grounds decisions, of which 90 per cent were positive; 2,866 conclusive grounds decisions were made, of which 91 per cent were positive.



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# 4. Public health approach to tackling modern slavery

## What is a public health approach?

A public health approach looks at issues from a societal rather than an individual level. It is a way of thinking and acting collectively to address a problem that can damage health and wellbeing, rather than seeing something through a single or narrow lens (for example, looking at something simply as a law and enforcement issue).

Public health approaches have successfully been applied to a range of other socially complex and long-standing problems, such as serious violence. They employ methods such as systems mapping and modelling using data, intelligence, research, evaluation and participatory methods to assess problems, inform interventions and increase opportunities for action to avoid or reduce health harm.

Crucially, a public health approach does not need to be led by public health teams but instead adopts a multi-agency approach across partners with similar goals, with a particular focus on prevention. The core principles of the approach are:

- understanding the problem at a population level
- framing the problem as part of a complex and interdependent system
- collating data and evidence of what works



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- being prevention focused
- protecting health and wellbeing
- encouraging multi-agency working
- addressing inequalities, social justice and human rights.

## Public health framework for modern slavery

The Independent Anti-Slavery Commissioner's Office has been a strong advocate of taking a public health approach to tackling modern slavery, working with the University of Sheffield and the Office for Health Improvement and Disparities (formerly Public Health England) to develop:

- [the case for a public health approach to modern slavery](#)
- [a guide for policy, strategy and local partnerships](#)
- [a public health framework for modern slavery.](#)

A public health approach encourages authorities to take a holistic approach to tackling modern slavery and is:

- **multi-agency**, meaning councils should work alongside the police, fire and rescue services, VCS organisations, local businesses and health services, as well as national government, to raise awareness of and prevent modern slavery
- **data led**
- **prevention focused.**



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The prevention-focused approach sets out three tiers of prevention:

- primary prevention, which seeks to prevent modern slavery from happening in the first place
- secondary prevention, which requires authorities to intervene early when the problem starts to prevent it from becoming established
- tertiary prevention, which makes sure an ongoing problem is well managed to avoid it becoming a crisis and to reduce its harmful consequences.

The public health framework for modern slavery outlines that primary prevention is a priority, although systemic efforts are often focused on tertiary prevention rather than primary or secondary prevention. Effective primary prevention actions could include steps to improve local conditions such as housing, support services, community policing, school-based initiatives, primary care provision and provision for young people and families.

The framework focuses on elements of a public health framework at three levels: national, local and service.

## National level factors

National level factors relate to how legislation, policy and different sectors of the economy and society can challenge modern slavery and promote wellbeing. These factors form the overarching context of all counter-slavery activity in the UK. Some examples include legislative protection that ensures, for example, victim immunity from prosecution; survivor-centred, rights-based policy; and operational infrastructure for



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effective referral, assessment and support, among others. Actors in this area include politicians, law makers, the criminal justice system, lobby and pressure groups, business (especially big businesses) and civil society. These national factors are often the starting point for regional/local and service level activity.

## Local level factors

Local factors are the conditions we all live in at the local level that can protect people from modern slavery or increase the risk of it happening. They also include local actions to prevent modern slavery such as early interventions, raising community awareness and responsiveness, and providing services to victims and survivors. This local work can be critical to counter-slavery action.

## Service level factors

There are two interlinked and complimentary service-level factors in the framework: service design and service delivery. Service design factors include how organisations put together the services that can prevent modern slavery from happening (for example, providing young people with safe spaces to gather), how services for people being exploited are designed, the design of services for people exiting exploitation, and the design of recovery and aftercare services. All of these factors are important, but often services are focused on people exiting exploitation, whereas a public health approach would encourage a broader focus – with particular attention paid to delivering services to people and communities at elevated risk of exploitation before exploitation happens.

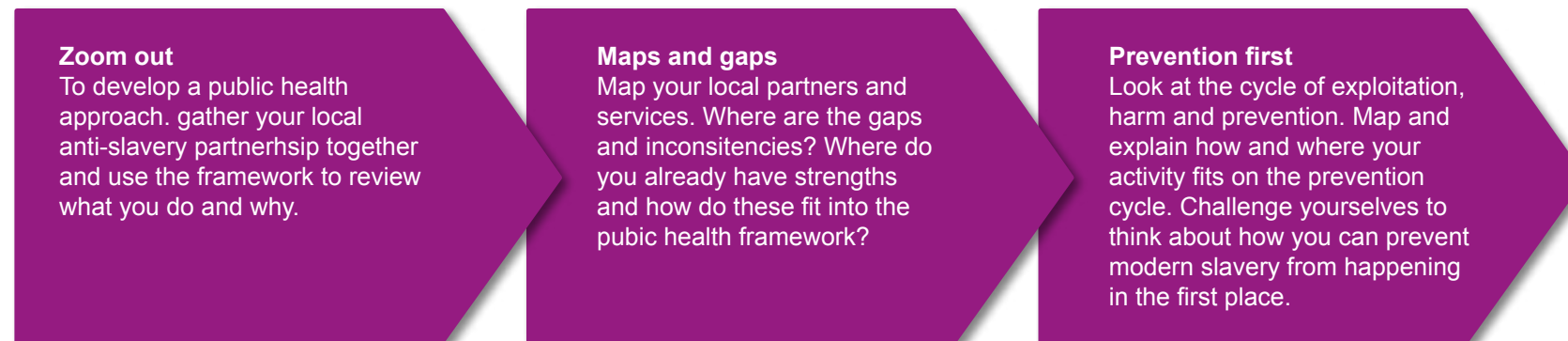


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Service delivery factors focus on the delivery of the services that have been designed. For example, trauma-informed practice is crucial to ensure survivors receive the support they need, while a person-centred approach ensures services are tailored to the individual.

## Putting it into practice

Councils should review the public health framework to consider how their work meets the principles set out in the local and service level factors. The [guide for policy, strategy and local partnerships](#) (page 19) suggests three steps to develop a public health approach, with supporting prompt materials and templates for each stage, as below.



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# 5. Councils' role in tackling modern slavery

Councils have an important role to play in tackling modern slavery, with work cutting across a range of different service areas and activities. This section provides an introduction and overview of four broad areas of council work on modern slavery:

1. Identification and referral of victims.
2. Supporting victims, potentially through safeguarding children or adults with care and support needs and through housing/homelessness services.
3. Community safety and disruption.
4. Ensuring that the supply chains councils procure from are free from modern slavery.

Subsequent sections of the document outline the steps councils should take to join up their modern slavery work as effectively as possible, and provide more detailed information about the role specific service areas and individual officers/councillors can play.

## Identification and referral

Section 3 of this guidance outlined the National Referral Mechanism (NRM) and the role of councils as a first responder. Under section 52 of the Modern Slavery Act 2015,



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councils are under a legal duty to notify the Home office when they identify a potential victim of modern slavery. As a first responder, councils may also receive referrals from non-first responder organisations (for example health bodies or charities working with victims) where they believe a potential victim should be referred into the NRM.

The statutory guidance sets out the following functions for first responder organisations (paragraph 4.7):

- identify potential victims of modern slavery and recognise the indicators of modern slavery
- gather information in order to understand what has happened to them
- refer victims into the NRM (in England and Wales this includes notifying the Home Office if an adult victim does not consent to being referred) via the Modern Slavery Portal
- provide a point of contact for the competent authorities to assist with the reasonable grounds and conclusive grounds decisions and to request a reconsideration.

It is important to note that the duty to refer applies whether or not a council is supporting a victim of modern slavery. Clearly, if a council is not engaging with an individual through its different services, it will be less likely to be able to identify them or make a referral. However, if a council is made aware of someone who is a suspected victim, there should be a process in place to ensure that this can be followed up and a referral can be explored, either by the council or by another first responder. As noted above, if a victim



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does not consent to a NRM referral but a council or other first responder believes that they are a victim, a duty to notify referral should be made.

The fact that councils collectively are first responders reflects the wide range of services and officers that could come into contact with victims of modern slavery, and highlights that being able to identify possible modern slavery is everyone's responsibility. A basic understanding of modern slavery, the NRM and where to refer victims therefore needs to be mainstreamed across the whole council.

In particular, officers working in frontline services – who may observe suspicious activity or come across people they think are victims – need to be equipped with the awareness to recognise what they are seeing, and the knowledge of where to share this information – both internally (for example, with a modern slavery lead officer or community safety team) and potentially externally (for example, local police/other law enforcement partners, and other anti-slavery network partners).

Councils will therefore need to ensure that staff have received training in modern slavery, its indicators, the NRM and local processes. However, although in theory anyone in the council could make an NRM referral (as it is the council rather than individuals that is the first responder), it is not practical to work on the basis that any member of council staff could make a referral. Staff making NRM referrals should have a good understanding of modern slavery, how to engage with victims, trauma-informed practice, and be well versed in what is needed for a good quality referral. Referrals are most likely to be made by officers in children's services, housing, adult safeguarding or community safety. Councils may wish to consider naming designated officers trained to make these referrals and should provide additional training for officers on this.



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The Home Office [training for first responder organisations](#) provides a basic introduction to types and indicators of modern slavery and the referral process. Other guidance is available online, and many VCS organisations provide training for council officers. Annex one provides links to other information, including organisations able to provide training, and local anti-trafficking non-governmental organisations could also be approached for support with training. In developing training, councils can draw on [Skills for Care's framework for modern slavery training](#).

## Supporting victims

Depending on the age and needs of victims of modern slavery, councils may have statutory responsibilities to provide support to them.

## Child victims

The position in relation to child victims is straightforward. Under the Children Act 1989, where a council has reason to believe that a child (irrespective of immigration status) may suffer or is suffering significant harm, they are under a duty to investigate to decide whether any action is needed to protect the welfare of that child. The Act also sets out a general duty on councils to safeguard and promote the welfare of children within their area who are in need.



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Child victims come from a large number of different countries and backgrounds, and there can be substantial differences between the circumstances of the exploitation. For example, a child trafficked into the UK for the purpose of domestic servitude will have different experiences to a British or resident foreign national child groomed and exploited through county lines. Regardless of the circumstances, all instances of exploitation constitute child safeguarding issues, and the responsibility of local authorities to provide appropriate support to those harmed by or at risk from them as part of their existing responsibilities is clear.

Although the support provided to child victims is led locally, child victims should still be referred into the NRM. In parts of England and Wales where the independent child trafficking guardian (ICTG) service is available, child victims without a parent figure will be assigned an ICTG to support them with their experience.

Particularly in the case of victims of county lines criminal exploitation, child slavery cases will often constitute a very different pattern of risk and impact to traditional child safeguarding, which focuses on preventing children from being harmed within the home. Victims of criminal exploitation will have been groomed by their exploiters, may not see themselves as victims and may resist support from both families and statutory services, including going missing from family homes and care. There are therefore clear differences in the response required by children's services to this abuse, when compared to a child at risk of abuse within the family home.

Significant work is underway to develop child safeguarding practice and social care support to reflect these more recent patterns of exploitation and identify the



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best responses. A third of councils are signed up to implementing the contextual safeguarding framework developed by the University of Bedfordshire, with other councils also working with partners on approaches to extra-familial harm (that is, risks to the welfare of children that arise outside of the family/home, for example in the community or through peer groups).

These approaches recognise the extra-familial risks children may be exposed to through the places they visit and the people they associate with, and seek to target these risks through the lens of child protection. Schools, education and youth services have a critical role to play, as well as social care, alongside other community-based services that can support a contextual safeguarding approach.

While practice is developing, there is also a long-term need to incorporate extra-familial safeguarding risks into early professional training and ongoing professional development across all safeguarding partners. This is so people understand current child safeguarding risks throughout their careers; know how to engage appropriately with children who are victims; can make informed and child-centred judgements about the context in which children are making decisions; and are aware of the most effective ways to support children who have become victims of modern slavery and prevent it from reoccurring. Equally, training and practise should emphasise the importance and legality of sharing data about children who are at risk. This challenge is consistently highlighted in serious case reviews, and improved understanding and confidence must be embedded across all agencies.



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## Adult victims

The picture in relation to adult victims is less straightforward. The support a person is entitled to depends on individual needs (particularly if they have care and support needs as defined by the Care Act 2014) and their immigration status. The support an adult victim receives will also be impacted by whether they consent to enter the NRM or not: many victims do not consent to be referred into the NRM. In these cases, a duty to notify should still be submitted, but councils will need to have different pathways of support depending on what decisions victims make. Pathways should also reflect the fact that adult victims may come into contact with or seek support from councils at very different stages: while they are in a position of exploitation or before they have considered referral to the NRM, after they have exited the NRM, or sometimes during their time in it.

## The ‘Modern slavery victim care contract’ (MSVCC)

As guiding principles for support for adult victims, councils should be aware that, while there has in the past been a widespread presumption that the primary support for victims would be provided through the MSVCC, it is now clearer (including in the statutory guidance on the Act) that:

- The MSVCC is not intended to displace entitlement to other support if an individual is eligible for it, rather, one of its core purposes is to signpost victims to wider support they are entitled to; victims should continue to receive this support even if they enter in the NRM process and would otherwise be entitled to support through the MSVCC.



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- The MSVCC provides support for victims to assist with their recovery from the experience of modern slavery and signposts to wider support services, advice and practical assistance to support the victim. The MSVCC is itself not set up to provide support for other specialist needs or conditions, for example those related to disability or addiction. This may mean that some individuals referred into the MSVCC with wider care and/or accommodation needs might need to be assessed and have their care needs met by local statutory partners under the Care Act or other legislation (for example, for providing accommodation with specific adaptations for people with disabilities).

The statutory guidance on the Modern Slavery Act sets out the following principle of support provided through the MSVCC:

‘8.6. The [MSVCC] operates as a bridge, to lift adult victims out of a situation of exploitation and to set them on a pathway to rebuilding their lives. As such, it is important that no support provided through the [MSVCC] prevents potential victims or victims from accessing support they would otherwise be entitled to receive. The [MSVCC] generally offers temporary support; other long-term support options should be pursued where they are available and able to meet the victim’s needs. One of the roles of the [MSVCC] is to provide information and signposting to potential victim or victims, and in some circumstances facilitate access to statutory and non-statutory services, including services that may provide longer-term support.’



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However, the guidance does also clarify that, in circumstances where an individual has several options, decisions should be led by what the victim feels is safest and most appropriate for them. Occasionally, clients with recourse to public funds may identify that they are seeking the specialist setting of a safehouse. In these circumstances, the following sections of the guidance may also be relevant:

‘15.6. [MSVCC] support prior to any reasonable grounds decision will be provided under the [MSVCC] for potential victims where there is reason to believe other accommodation available to them may be unsafe or unsuitable.’

‘15.10. The views of the victim and the needs-based assessment will be taken into account when determining whether or not to enter MSVCC accommodation.’

In practice, when a referral is made, the MSVCC referrals team will look at the individual to assess their needs and risks and how these can best be met. If a victim has recourse to public funds and would be suitable for council accommodation this option will be explored in most cases. However, based on the information provided by a victim, the referrals team might determine that a safehouse would be more appropriate despite them having recourse to public funds. In some cases, a risk assessment might indicate that the risks of accommodating someone in a safehouse may be too high, in which case the referrals team would pursue council accommodation if they have recourse or alternative accommodation if not.

Where The Salvation Army believes that a council is refusing to accommodate a victim who has recourse (and they believe their needs would be best met in council accommodation) the referrals team will request a section 184 decision letter under the Housing Act 1996.



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There are, however, some challenges with the approach of focusing on local services for support. Alongside the general issue of existing pressures on services such as housing and social care, different areas of domestic legislation have different thresholds for accessing local support from councils and other partners, and not all legislation makes specific provision for victims of modern slavery.

## Possible support available under domestic law and international conventions

Adult victims of modern slavery may be entitled to the following support (explored in more detail in subsequent sections):

- **Housing Act 1996:** under this legislation, local housing authorities may owe victims of modern slavery a range of duties: prevention/relief duty, the duty to provide interim accommodation, and the main homelessness duty (owed to some of those in priority need). The [homelessness code of guidance](#) was updated in summer 2021 specifically to reflect these duties more clearly.
- **Care Act 2014:** adult social care can be a route for victims of modern slavery or human trafficking to access support if the adult has care and support needs and is unable to protect themselves. The legal framework, approach to and process for adult safeguarding is set out in the Care Act 2014, which recognises modern slavery as a category of abuse. However, victims of modern slavery may not have care and support needs as defined by the Care Act, and councils and their partners may put different wraparound support structures in place to ensure victims' and survivors' needs are met.



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- **Localism Act 2011:** the general power of competence introduced in the Localism Act provides councils the same broad powers as an individual to do anything unless it is prohibited by statute. Councils have been encouraged to use this power to provide support for victims of modern slavery who do not otherwise have entitlement to access local services and/or to avoid breaching the wider international obligations (see below).

Alongside domestic legislation, councils should also be aware of the requirements set out in the various international conventions the UK has signed up to, in the context of the established legal presumption that the UK should act in accordance with its international obligations. The UN ‘Human rights and human trafficking fact sheet 36’ is clear that international treaties may be enforceable in domestic law and expectations can therefore extend beyond NRM support, which are the primary vehicle for meeting our obligations.

“Treaties [which includes conventions] are the primary source of obligations for States with respect to trafficking... By becoming a party to a treaty, States undertake binding obligations in international law and undertake to ensure that their own national legislation, policies or practices meet the requirements of the treaty and are consistent with its standards. These obligations are enforceable in international courts and tribunals with appropriate jurisdiction, such as the International Court of Justice, the International Criminal Court or the European Court of Human Rights, and may be enforceable in domestic courts, depending on domestic law.”



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Recent UK cases and case law on modern slavery do indicate that decisions can refer to international conventions and human rights legislation and, even if an international convention is not directly enforceable, it may be considered in interpreting the scope of obligations under domestic legislation. As a result, councils should be mindful of how these treaties can be interpreted as applying to their own obligations. The following provisions are of particular relevance to the issue of victim support:

- Article 12 of ECAT requires that signatories adopt measures to assist victims in their physical, psychological and social recovery, including appropriate and secure accommodation.
- Article 11 of the EU Anti-Trafficking Directive requires the state to provide ‘assistance and support’, including the provision of ‘appropriate and safe accommodation and subsistence’ as soon as a person is ‘indicated to be trafficked.’.
- Articles 3 (prohibition of torture; no one shall be subjected to torture or inhuman or degrading treatment or punishment) and 4 (prohibition of slavery and forced labour) of the European Convention on Human Rights, which (as have been further developed in case law) provide that there is an obligation to identify, investigate and ensure a framework for the protection and support of victims.
- Articles 6 (assistance to and protection of victims of trafficking in persons) and 9 (prevention of trafficking in persons) of the Palermo Protocol, which seeks to prevent and combat trafficking in persons, paying particular attention to women and children.



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The LGA has raised with the Home Office that some of the international commitments the UK has signed up to may be interpreted as going beyond the domestic legislation that councils apply in relation to adult victims; and that there is a need to ensure domestic law is aligned to the international duties the UK is bound by, and case law relating to it, to help ensure that there is clarity and understanding about the support that should be provided and by whom.

Following lobbying from the LGA and others, the Queen's Speech in May 2022 included a commitment for a Modern Slavery Bill which will enshrine in domestic law the Government's international obligations to victims of modern slavery, especially regarding their rights to assistance and support. Alongside that clarity should also come the funding to support it, with councils to date having received no 'new burdens' funding to support victims of modern slavery.

## Community safety and disruption

Modern slavery is a complex, serious and often organised crime. Under Section 17 of the Crime and Disorder Act 1998 councils have a duty to exercise their functions with due regard to the need to do all that they reasonably can to prevent crime and disorder in their areas, which will include modern slavery and trafficking. As well as targeting slavery directly, councils may also encounter victims of modern slavery in their work to disrupt county lines, child sexual exploitation, gangs, violent crime, drugs and begging, among other things.



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Councils are also involved in partnerships and existing workstreams whose work should consider and have an impact on tackling modern slavery.

## Community safety partnerships

Community safety partnerships (CSPs) are statutory partnerships bringing together councils, fire and rescue services, police, health and probation services to reduce crime and disorder and anti-social behaviour, reduce reoffending and combat drugs and alcohol misuse. They do this through a range of statutory duties including:

- setting up a strategic group to direct the work of the partnership
- regularly engaging and consulting with the community about their priorities and progress achieving them
- setting up protocols and systems for sharing information
- analysing a wide range of data, including recorded crime levels and patterns, in order to identify priorities in an annual strategic assessment
- setting out a partnership plan and monitor progress
- producing a strategy to reduce reoffending
- commissioning domestic violence homicide reviews.

CSPs assess the crime profiles of their local area, share information, and work with local police and crime commissioners (PCCs), whose police and crime plan they must have regard to when exercising the CSP's functions.



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## Violence reduction units

In 20 police force areas across the country, violence reduction units (VRUs) have been established to bring together the police, councils, health and education services, community groups and other partners, to ensure a multi-agency response to the identification of local drivers of serious violence and agree to take necessary action to tackle these. This includes being responsible for driving a local strategy and embedding cultural change alongside their commissioning role. VRUs attempt to prevent serious violence from occurring and seek to embed a public health approach at a local level.

While not all serious violence will be linked to modern slavery, it is likely that much of this will be gang or county lines related, so VRUs will need to be connected into how to tackle specific areas of modern slavery. Many VRUs have implemented a range of interventions to respond to child criminal exploitation and county lines as a driver of serious violence, including:

- pilots to test contextual safeguarding approaches
- research to establish the effect of social media on violence and exploitation
- awareness-raising activity in schools
- the use of mentors
- navigator roles in custody suites and A&E
- training for professionals on trauma-informed approaches
- use of a social network analysis tool to understand wider risk across peer groups.



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## Serious and organised crime

The Government's Serious and Organised Crime Strategy required PCCs to establish local multi-agency groups, including councils, to tackle serious and organised crime. Police forces and the NCA produce serious and organised crime local profiles to support multi-agency partners, including councils, to:

- develop a common understanding among local partners of the threats, vulnerabilities and risks relating to serious and organised crime
- provide information on which to base local programmes and action plans
- support the mainstreaming of serious and organised crime activity into day-to-day policing, local government and partnership work
- allow a targeted and proportionate use of resources.

The local profile has been used to brief local multi-agency partnerships and other policing and law enforcement teams on the threat from serious and organised crime in their area. The local profile should therefore provide partners with a common understanding of the risks of modern slavery within their own areas. These groups provide an opportunity to share information and support common activity across partners on modern slavery to deliver a coordinated approach to disruption and other activities, based on local intelligence.



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## Other disruption activity

As well as wider partnership work to target crime and disorder including modern slavery, there are other council services which have scope to identify and disrupt modern slavery through the course of their usual activities. Just as the contextual safeguarding model recognises the role of a wide range of services in protecting children and young people from safeguarding risks outside the home, this approach recognises that the quickest and sometimes most effective way to disrupt perpetrators may be through targeting other areas of legal or regulatory non-compliance, rather than through modern slavery legislation.

Councils have a wide range of regulatory powers and tools that can be used to inspect premises of concern, whether they are private rental sector properties, food businesses, hand car washes, nail bars or the licensed or hospitality sector. Health and safety legislation, food laws, trading standards powers and housing legislation all provide councils with a pretext for visiting high-risk properties and undertaking joint work with other partners to target slavery.

Similarly, anti-social behaviour powers may also provide disruption options – for example under the Anti-Social Behaviour, Crime and Policing Act 2014, community protection notices for people, businesses or organisations committing anti-social behaviour; or closure orders to quickly close premises being used or likely to be used to commit nuisance or disorder.



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## Ensuring supply chains are free from modern slavery

Although councils are not yet under a legal requirement to take steps to ensure their supply chains are free from modern slavery, many are already doing so.

Section 54 of the Modern Slavery Act 2015 introduced provisions on transparency in supply chains (TISC), requiring commercial entities with an annual turnover of £36 million or more to report annually on their actions to identify, prevent and mitigate modern slavery in their supply chains. In 2020, Government confirmed its intention to:

- extend the TISC requirements to public bodies with a budget threshold of £36 million or more
- mandate the areas that TISC statements should cover
- introduce a TISC reporting deadline
- require publication of TISC statements on the Government's new [online modern slavery statement registry](#).

The Government has encouraged organisations, including public bodies, to introduce these measures voluntarily ahead of the legal requirement changing. Legal requirements are due to be introduced by the Modern Slavery Bill announced in the 2022 Queen's Speech and are expected to be in place by September 2023.

Recognising the moral case to show leadership on this issue, the LGA encourages all its members to ensure that modern slavery and human trafficking risks are being considered in procurement and commissioning work and reported on in a TISC statement, even where they will not meet the £36 million threshold.



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The LGA has set out a number of steps and activities that should underpin the production of a TISC statement and help to embed consideration of modern slavery and human trafficking issues in procurement and commissioning processes:

- **Training and awareness:** ensuring that staff involved in commissioning and procurement processes and decisions are aware of the risks of modern slavery and how to mitigate against it.
- **Supply chain risk mapping:** reviewing the organisation's overall expenditure to identify high-risk areas for modern slavery/human trafficking in your supply chains. High-risk areas for council spending include construction, agriculture and farming, adult and children's care sectors, facilities management and cleaning contracts. Having contracts solely with UK-based suppliers does not preclude there being modern slavery in your supply chains.
- **Engaging with suppliers:** working with primary (tier 1) suppliers on due diligence matters to ensure that they are aware of modern slavery risks and are taking responsibility not only for their own processes and employees, but are also considering the risks among their own suppliers further down the supply chain.
- **Reviewing contracts and contractual information/monitoring:** considering how councils can embed modern slavery considerations into the terms of their contracts, including specifying the contractual information and monitoring required to ensure transparency, and that steps are being taken to prevent slavery occurring within the council's supply chains.



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**Embedding processes:** working collaboratively across different parts of the council involved in commissioning, procurement and contract management to ensure a consistent approach and understanding across the life-cycle of the contract.



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# 6. Coordinating council work and effective partnership working

## Internal working

The previous section set out the four broad areas of councils' role in tackling modern slavery. These diverse responsibilities mean that modern slavery intersects with a number of different council services and roles:

- business-facing services such as environmental health, trading standards and licensing may encounter victims or perpetrators when inspecting premises such as nail bars and regulating other businesses, such as taxis and private hire vehicles
- housing officers inspecting private sector housing and houses of multiple occupation (HMOs) may come across modern slavery victims living in substandard accommodation
- councillors may hear concerns from residents about particular businesses or houses in their areas
- customer services may come into contact with victims through their ordinary dealings with the public
- community safety officers may come across trafficking or modern slavery when working on issues around serious and organised crime, gangs, drugs and other crimes committed within their area – such as cannabis cultivation and begging



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- housing and homelessness teams may see homeless people who have been victims of modern slavery, and should be aware that homeless people are at particular risk of trafficking
- children’s safeguarding services will deal with trafficked children or children who have been exploited
- adult services may have a role supporting adult victims with care and support needs
- officers working with local partners on resettling new arrivals may find that trafficking or modern slavery has been present in refugees and asylum seekers’ routes into the UK.

This complex spread of possible involvement with modern slavery victims across a single organisation means that councils need to think about how to join up their work internally, as well as with external partners. One area of challenge that councils should consider on an organisational basis is the provision of support to adult victims of modern slavery.

Given the way in which victims may or may not fall within the remit of both the Care and Housing Acts, particularly for victims with no recourse to public funds, there can be disputes between housing and social care services about responsibility for supporting adult victims. We set out below how upfront discussions between different council teams and external partners can help to prevent victims being passed between different services and ensure their needs are met.



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## Cross-council coordination: lead officers/single points of contact

Wherever possible financially, councils are encouraged to appoint an organisation-wide modern slavery lead officer/single point of contact responsible for driving activity and consistency across the organisation. This ensures that there is an officer responsible for working with the different teams engaged with modern slavery issues and for driving the issue forward within councils, leading work such as:

- collating NRM referral statistics and intelligence
- convening council working groups to share work on modern slavery
- building an organisation-wide picture of council activity on modern slavery
- providing modern slavery training to council staff
- developing internal referral pathways
- providing a single point of contact for external organisations to engage with.

Feedback from councils shows that creating an identified role/team to lead modern slavery work has made a significant difference through creating capacity for, and ownership of, a cross-cutting issue that requires coordination. While it is recognised that not all councils have the resources to support this type of post, possible sources of funding have included partnership and public health funding.

Councils should also consider appointing lead or designated officers within critical service areas. This ensures that there are clear points of contact for other people within the organisation needing to engage with particular services, builds a network of expertise, and provides a route for sharing information and guidance.



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## Birmingham City Council: modern slavery coordinator

The modern slavery coordinator role in Birmingham City Council is funded on a yearly basis by the office of the police and crime commissioner, and then commissioned out to the West Midlands Anti-Slavery Network to provide.

The role sits within Birmingham's community safety team but also has the benefit of a place in the voluntary and community sector (VCS) through the commissioning arrangement with the anti-slavery network.

The coordinator offers a single point of contact for modern slavery work across Birmingham City Council, both strategically and operationally, with a particular focus on the adult cohort that does not fit neatly into the existing service delivery of a council. It can be extremely challenging for councils to fully embed modern slavery responses at an operational level, particularly across adult social care and housing directorates where capacity is stretched, and to ensure that modern slavery is mainstreamed as a key priority for formal commissioning, particularly in the pre- and post-NRM spaces.

Having the modern slavery coordinator role has provided the capacity and focus to drive developmental work on these issues. Being located in the community safety team also puts the emphasis on partnership work, meaning there is a focus on convening relevant partners to identify gaps in provision, and then exploring the design and implementation of interventions to address those where possible. One example is using the coordinator role to convene relevant partners to develop pathways in the pre-NRM space.



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Alongside capacity and focus, the coordinator role has ensured that the council has specialist expertise on an extremely challenging issue. This has enabled Birmingham to develop adult modern slavery pathways that make the most of VCS services in their ability to provide a specialist, independent advocacy response, but also meet the council's understanding of its obligations under international law to respond to indicators of exploitation, irrespective of requirements under domestic legislation.

The coordinator function also includes provision of on-request second-tier advice and training to all staff across the council, and support with escalating complex cases to national partners and statutory bodies where required.

### Enfield Council: modern slavery team

The London Borough of Enfield has a dedicated modern slavery team to lead and coordinate work in this area. The team comprises a team manager and two modern slavery investigators, and they work jointly with a designated detective sergeant from the Metropolitan Police. The team is based in the council's adult strategic safeguarding team and jointly funded by Enfield Council and the Metropolitan Police.

The council has taken a specific decision to treat all adult cases of modern slavery as safeguarding cases, regardless of whether individuals meet the threshold of having care and support needs under the Care Act. Where concerns are raised about possible individual victims of modern slavery, these are therefore raised with the respective multi-agency safeguarding team for a safeguarding response, including the provision of short-term accommodation. However, concerns about modern slavery in locations or businesses are shared directly with the modern slavery team. These concerns are mapped across the borough, as are NRM referrals made by the council and other partners.



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The team has developed pathways with a range of council teams including housing, community safety, regulatory services, private sector housing and social care. It works closely with multiple external partners including statutory agencies such as the NHS, London Fire Brigade, Metropolitan Police, probation, education providers and Department for Work and Pensions, as well as VCS organisations such as The Salvation Army, Human Trafficking Foundation, Hestia and Women's Aid.

A directory of local modern slavery services is maintained. A quarterly modern slavery board meeting is held, bringing together key contacts from the council departments and partner organisations. A wider quarterly modern slavery forum is held as an open event for colleagues to dial in to ask any questions, raise the need for signposting or share anything in relation to modern slavery.

The modern slavery team undertakes awareness-raising and training sessions for other council teams and external partners such as the police and hosts an annual modern slavery conference. It also aims to raise awareness of modern slavery among the public (residents and businesses) through leaflet drops, anti-slavery events and social media updates on modern slavery.



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## Referral pathways

Having these contacts and routes into services can assist another critical component of developing a joined-up approach across councils: creating referral pathways for victims who may have come into contact with different parts of the organisation. The purpose of a referral pathway should be to ensure that no matter how a victim comes into contact with a council – and it could be through one of several different ways – they are treated consistently.

With victims potentially eligible for support from a range of council services (but frequently not eligible), it is important that they can be seamlessly referred into the right point of contact within services and dealt with by officers who understand the modern slavery dimension and the context in which a referral of a possible victim has been made. Referral pathways should be clear and accessible to external partners, as well as internally, and appropriate to victims who do, and do not, consent to enter the NRM.

All frontline staff should be aware of their council's modern slavery referral routes so that they know what to do when they encounter a victim of modern slavery – not just in terms of the council's obligations in terms of housing support, but also in terms of how the modern slavery aspect of the case will be dealt with. For example:

- Who else within the council should be notified of the suspected case – is a safeguarding referral required, and should a modern slavery coordinator be notified?
- Who will take responsibility for working with a suspected victim to discuss an NRM referral, if the council is acting as the lead first responder – does this role sit with the team that identified a possible victim or another team?
- What engagement, if any, is required with any external agencies in relation to the case?



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## Training and expertise

A related point is that there needs to be sufficient awareness and expertise, created through training and continuous professional development, to support the effective implementation of referral pathways. This is so that victims are interacting with staff who understand the modern slavery context and are aware of the referral pathways and the types of cases that may come through them, and respond appropriately.

## Proactive agreement on victim support

As noted above, there can be disagreements between different council teams – and sometimes between councils – over responsibility for supporting adult victims of modern slavery. The former Independent Anti-Slavery Commissioner, Dame Sara Thornton, raised with the LGA's Safer and Stronger Communities Board the difficulties for victims passed between different council teams and/or different councils, and encouraged councils to reflect on and plan for the support they can provide to individuals at different stages.

Councils can seek to mitigate the potential challenges by proactively working across council teams to clarify legal responsibilities, considering the approaches that could be taken in circumstances that do easily meet eligibility criteria (including 'no recourse to public funds'), engaging with partners to identify opportunities for VCS support to plug gaps in statutory services and, if possible, pooling budgets with partners such as police and crime commissioners to commission emergency accommodation and/or dedicated support for victims.



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## Data collection and intelligence

Councils should strive towards creating a shared set of modern slavery data across their organisation, and aim to build in modern slavery data collection across all relevant systems. Having accurate corporate data on the number of NRM and duty to notify referrals that the council has made, along with a shared picture of local intelligence, are prerequisites to having a joined-up and targeted approach to this issue. It is also vital in helping to evidence the issue and securing future funding to support modern slavery work.

Again, this may be easier to achieve if there is a designated post holder responsible for driving the development of this type of data collection and then ‘owning’ the analysis and reporting of it.

Many councils are beginning to explore what data insight and performance management information they can collate on a consistent basis across different teams. Basic steps that councils can take include ensuring that there is central corporate recording and reporting of NRM referrals and any modern slavery concerns/intelligence raised by council officers or services, where a duty to notify referral has been made or other concerns raised. Councils can also record numbers of staff who have been trained on modern slavery.

A subsequent extension of this data collection approach would be for relevant data systems (for example in housing, enforcement or safeguarding services) to include a systems flag to identify modern slavery concerns to enable accurate reporting. Councils should ensure they have mechanisms and protocols in place for data sharing (anonymised as necessary) with local and national partners, to ensure they are collecting



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a full intelligence picture about their area. For example, the police will be aware of referrals to the NRM, while the VCS may be working with other victims who can share information.

Councils should also ensure that they have pathways in place to collect and disseminate intelligence (including anonymously) from both communities and frontline organisations. These should ensure that this potentially rich information reaches the appropriate intelligence functions in councils and partner enforcement bodies.

Once councils have begun to build up an intelligence picture, they can begin to undertake mapping and analysis of local trends and concerns to help target preventative and disruption activity, as well as identifying the resources needed to support survivors.

### Derby and Derbyshire Modern Slavery Partnership

In 2015/16, the Derby and Derbyshire Modern Slavery Partnership undertook a scoping exercise to help understand the prevalence of the issue in Derbyshire, the types of people who are subjected to modern slavery, the type of support required afterwards, and the level of training required by staff who identify and protect the victims. Despite patchy and limited responses from some partners and organisations, the findings helped direct the partnership strategy and action plans, ensuring that they were robust enough to manage the increasing number of modern slavery victims in Derby and Derbyshire.



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Building upon the 2015/16 exercise, a new survey template has been developed, with a view to updating the focus on each area of modern slavery. Since 2015/16, many more partner agencies are represented within the partnership, thereby ensuring that the findings from the new survey will not just be primarily police or local authority data centric.

The partnership set up a task and finish group to develop the survey, with presentations given to the partnership's pursue, protect and awareness-raising subgroups, allowing them to comment on the proposals for the scope of the survey. Although limited feedback was received initially on the proposals, there is an expectation that there will be better engagement with the survey, as it has been structured to encourage increased participation.

Rather than one large survey, the partnership has chosen to use separate surveys to cover each of the exploitation types, and will focus separately on young people and adults. It will gather softer intelligence, experience and observations, with a view to enabling a more proactive approach and building an enhanced local picture to sit alongside specific intelligence. It will also verify whether local information sharing is taking place and that partner agencies are following correct processes. Work was underway to launch a sexual exploitation survey during 2022, with further exploitation surveys to follow. Moving forward, the partnership anticipates refreshing the surveys in 2025-26. The timing of this will be led by intelligence and any changes in circumstances, such as new legislation.



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The survey aims to identify how and where modern slavery is evolving across Derbyshire and will identify geographic areas and premises of concern. Respondents will be able to comment on whether the pandemic impacted on modern slavery, how victims are being supported by organisations, the types of support provided and what needs to be improved. This information is important to ensure that the services in place are suitable and set up to support those being identified through reporting and intelligence.

The findings from the first of the surveys (sexual exploitation) will assess the levels of partner engagement with this workstream and will enable the partnership to adapt/tweak the process to improve engagement with future surveys.

The collective findings from the surveys will feed into the development of a broader strategic assessment of modern slavery and human trafficking mapped across Derbyshire, with data such as NRM returns, duty to notify and local investigation information also included. In addition, survey findings and modern slavery specific datasets such as restricted police intelligence, fire, local authority, commissioned services and open-source datasets will be used to further inform and enhance the strategic assessment.



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## Strong political and managerial governance and leadership

Delivering a strong response to modern slavery is not easy. There are competing priorities and resource pressures in all local government services, and supporting victims – who may be reluctant to disclose information and often do not fit neatly into eligibility criteria or traditional expectations of how victims will present to services – can be challenging.

Developing a strong, council-wide response to slavery requires drive and commitment from senior leads at both political and officer level, as well as the capacity and energy of operational leads. It will also benefit from shared governance across multiple boards and agencies, at both strategic and operational level, to ensure a joined-up approach across local partners. The LGA's councillor guide to tackling modern slavery sets out the individual role that councillors can play, while our '[maturity matrix](#)' provides a high-level guide that both senior officers and councillors can use to benchmark their council's progress on modern slavery work.

## Procurement and commissioning

Work on supply chains is a relatively discrete part of councils' work on modern slavery, with less overlap with frontline services working with victims. Nevertheless, it is possible that procurement teams or commissioners could become aware of modern slavery concerns about very localised suppliers – for example in the care sector, a high-risk sector for labour abuse and one that by its very nature will have a very localised delivery model and workforce.



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It will therefore be important to ensure that there is at least some join-up between the modern slavery work being led by procurement teams and commissioners and the council's wider work on modern slavery (and the lead officer/team for modern slavery if appointed). Join-up between corporate procurement and service led commissioning teams on transparency in supply chains will also be important to share learning and understanding.

## External partnership working

Underpinning councils' internal work in this area will be effective partnership working. At the individual case level, some areas are starting to develop a multi-agency risk assessment conference (MARAC) approach when suspected victims of slavery have been identified, a best practice approach that brings together different partners to consider what actions need to be taken. More broadly, multi-agency working and effective information sharing between local partners can also aid in the detection of traffickers and potential victims of modern slavery.

Councils should work with other statutory bodies such as local police and health services, job centres, national agencies such as the Gangmasters and Labour Abuse Authority (GLAA), Immigration Enforcement, as well as VCS partners, to share intelligence on risks and relevant operations. All council services should be aware of their responsibilities and the practical contributions and resources which they can make to multi-agency partnership working and support.



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Councils will already be part of numerous partnerships that have a role in sharing information, identifying those at risk of exploitation and tackling modern slavery as part of their broader work. Working with community safety partnerships, local child safeguarding arrangements, adult safeguarding boards or other local partnerships will be a critical part of councils' work.

However, most local and regional areas have also set up modern slavery partnerships, bringing together a range of different partners to coordinate work across the area. These partnerships may include district and county councils, police and crime commissioners, fire and rescue services, NGOs, the GLAA, safeguarding boards, health, police services and government agencies, among others, and councils should consider how they are contributing to these partnerships.

The Independent Anti-Slavery Commissioner and the University of Nottingham's Rights Lab have mapped the different anti-slavery partnerships in existence across the UK, which can be viewed through an [interactive map](#). The Human Trafficking Foundation brings together a [national network of modern slavery partnership coordinators](#) to provide a forum in which to promote inter-regional cooperation and sharing of best practice between regional partnerships across the UK.

As well as anti-slavery networks, councils should think about their engagement with the wider private, community and voluntary sector in their local area. Forums such as local enterprise partnerships or local strategic partnerships can be used to ensure that there is awareness of modern slavery and the potential risk in supply chains, that it can be referred appropriately, and that joint initiatives can be launched.



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In terms of the voluntary and community sector, as a minimum, it will be helpful for councils to understand which VCS partners are working with victims of modern slavery in their areas. This may be as part of the MSVCC (for example, local safehouses or outreach support), but it may also involve work by anti-slavery charities outside the MSVCC support framework. Clearly, these organisations will come into contact with victims of modern slavery, often before an NRM referral has been considered, and it will be helpful for them to understand how to link into the council in order for victims to be referred for any support to which they are entitled.

Although information about some aspects of the MSVCC (for example the location of safehouses) is understandably sensitive, The Salvation Army are keen to develop closer links between their sub-contractors and councils. To find out about local MSVCC services councils can contact The Salvation Army via [mst@salvationarmy.org.uk](mailto:mst@salvationarmy.org.uk). The Human Trafficking Foundation have published a map of survivor support services which can also signpost to local organisations.



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# 7. Children and young people and modern slavery

## Overview of the council's roles

Council services working with children and young people have a critical role to play in identifying and referring child victims of modern slavery and human trafficking, as well as supporting child victims once they have been identified. They can also work with partners in teams such as community safety to share intelligence to support disruption of modern slavery. Underpinning this, councils' statutory duty to safeguard children means that they have a role in doing what they can to prevent children being harmed by slavery and trafficking in the first place.

The table below summarises how different teams support different elements of councils' work on modern slavery.



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Council role	Council teams
<b>Identification and referral</b>	<p>All services working with children and young people, including social workers, schools and youth services, are well placed to identify children who are at risk or displaying indicators of being exploited.</p> <p>Councils should have clear referral pathways setting out where these concerns should be highlighted and who within the council will take responsibility for gathering information and making NRM referrals (and dealing with reconsiderations if required).</p>
<b>Supporting victims</b>	<p>Councils have a duty under the Children Act 2004 to work with local police and health partners to safeguard and promote the welfare of children in their areas. Children's services teams are responsible for undertaking assessments of children at risk of significant harm and working with partners to put in place plans to keep children safe where necessary.</p> <p>Councils have a responsibility for preventing children from going missing and safeguarding and protecting them when they do. There should be an up-to-date local Runaway and Missing from Home and Care Protocol, and all children who go missing should be offered an independent return home interview.</p> <p>Councils are responsible for supporting and advocating for children in care and care leavers, for whom they are corporate parents. These cohorts are often at greater risk of exploitation, and councils will need to ensure they are fully supported, including being in appropriate accommodation and accessing the right services.</p>



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<b>Disruption</b>	<p>Community safety teams lead councils' multi-agency work under the Crime and Disorder Act to tackle crime and disorder in their areas, including modern slavery and human trafficking issues affecting children and young people.</p> <p>Other services such as regulatory and environmental services can support contextual safeguarding through sharing intelligence and using diverse powers to disrupt activity harming children in areas they are responsible for regulating.</p>
<b>Prevention</b>	<p>Social care services have prevention responsibilities, schools have a role in teaching children about the risks of exploitation, and youth services can provide diversionary activities that help prevent children becoming victims of slavery. Youth offending teams have a role in supporting children who are being coerced into criminal activity. The broader safeguarding duties outlined above also mean that children's services should take steps to protect specific children and young people at particular risk of harm, including from modern slavery.</p> <p>Public health teams can be a valuable source of data and intelligence collected for local joint strategic needs assessments. Councils can look at child exploitation as part of supporting wider health and wellbeing strategic priorities, such as ensuring that children and young people feel safe in their local community, and considering action to tackle the use of illegal drugs.</p>



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Local government responsibilities around child slavery are, therefore, part of a council's existing child safeguarding responsibilities. There are many resources available to practitioners on safeguarding duties in this area, and this guidance does not aim to replicate what is already available through the ['Working together to safeguard children'](#), the primary guidance on multi-agency safeguarding arrangements under the Children and Social Work Act 2017, as well as slavery and trafficking focused guidance such as the [LGA's 'Tackling child exploitation: resources pack'](#) and the Government's [statutory guidance on the Modern Slavery Act](#) (which covers support to child victims). Instead, this section summarises the current picture on child trafficking and modern slavery in the UK, highlights key considerations for practitioners working with child victims and senior officers leading relevant services, and signposts to available guidance and good practice elsewhere.

## Current patterns of cases involving children and young people

Child victims account for the significant majority of victims of modern slavery that councils themselves identify and refer into the NRM. [NRM statistics for 2021](#) show that:

- 43 per cent (5,468) of the total 12,727 referrals into the NRM related to exploitation that took place when the victim was a child (although the number includes some victims who are now adults).
- Councils accounted for 25 per cent (3,229) of total referrals to the NRM, but a much higher proportion of child referrals into the NRM: English and Welsh councils accounted for 52 per cent (2,849) of the overall 5,468 child referrals.



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- Approximately 90 per cent of council referrals to the NRM related to child victims.

The main trend driving increasing child NRM referrals in recent years is child criminal exploitation, which accounted for around half of all child referrals into the NRM. ‘Labour’ and ‘sexual’ were the other most commonly identified forms of exploitation, with some victims exploited in a combination of different ways. The driving trend within child criminal exploitation was county lines, which was flagged in 2,053 cases referred into the NRM, representing a 23 per cent increase from the previous year.

‘County lines’ is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK. The gangs often exploit vulnerable individuals, such as children, to transport substances, and mobile phone ‘lines’ are used to communicate drug orders. Gangs often use violence and the threat of violence to the victim and/or their family as a means of control.

The National Crime Agency has produced a helpful [overview of county lines](#).

In terms of nationalities, 75 per cent of child victims referred into the NRM in 2021 were UK nationals. After UK nationals, children from Albania, Vietnam and Eritrea were the next largest nationality groupings. However, while the dominant form of exploitation for UK child nationals was criminal and then sexual exploitation, for the other most common nationalities the most prevalent forms of exploitation were: labour, criminal, or a combination of labour and criminal exploitation for Albanian victims; labour or labour



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and criminal exploitation for Vietnamese victims; and labour or labour and domestic for Eritrean victims.

Clearly, there are likely to be significant differences for children's services in the response to victims with different circumstances experiencing very different forms of exploitation; for example, an overseas national child who has been trafficked into the country as an unaccompanied minor and is being forced to work in a nail bar or domestic servitude, compared to a UK child who may live with their family but have become involved in gangs and county lines. While county lines and other forms of criminal or sexual exploitation are most common and have captured most attention, services should ensure that they are equipped to deal with both, given the still high numbers of children experiencing other forms of exploitation.

Any child can become a victim of child criminal or other exploitation. Criminals use sophisticated and targeted approaches to groom children, and are increasingly looking to ensnare children who may be less likely to otherwise come into contact with statutory services. However, there are some cohorts who are recognised to be at greater risk of becoming exploited:

- children in care
- children who have been excluded from school
- children with special educational needs or disabilities
- children who are vulnerable, perhaps because they live in poverty, have family members involved in criminality or have poor mental health and wellbeing.



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## Framing the overall approach

There is lots of helpful guidance available setting out the overarching principles that should govern how organisations work with victims of modern slavery.

Chapter one of the Human Trafficking Foundation's '[Slavery and trafficking survivor care standards](#)' sets out the following key principles (these are currently being updated):

- accessibility and non-discrimination
- human rights based approach
- holistic and victim-centred
- empowering
- freedom of thought, religion and belief
- multi-agency approach
- professional boundaries
- safe working approach
- trauma-informed approach.

The [public health framework for modern slavery](#) also sets out principles for how services should be delivered:

- empowerment
- trauma-informed practice
- peer-led support
- tailored and person-centred support across the recovery journey
- culturally competent.



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## A trauma-informed approach

Working sensitively with all victims, particularly children and young people, should be central to how councils and professionals respond. The [‘Trauma-informed code of conduct for all professionals working with survivors’](#), produced by the Helen Bamber Foundation, sets out guidance for how interactions with victims should be handled. Similarly, the Human Trafficking Foundation’s [‘Survivor and trafficking survivor care standards’](#) also provide comprehensive guidance for providing support in an effective, person centred way.

## A child-centred approach

A related need is for a child-centred response, focusing on the specific needs of individual children. A recent report, [‘Practitioner responses to child trafficking: emerging good practice’](#), cites this as a public health/whole system approach, rather than a criminal justice response, enabling a more empathetic approach.

## Cultural competency and sensitivity

Given the diverse range of children referred into the NRM, alongside the trafficking of children from overseas, cultural sensitivity and understanding, along with the removal of unconscious bias, are critical. The BME Anti-Slavery Network has recommended that all council practitioners working on this issue receive annual training on cultural intelligence, equality, diversity and inclusion. Research in Practice have developed [a framework for considering levels of cultural competence](#) within relevant teams and organisations, and actions to advance this.



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## Accessibility

Services and support should be accessible, with children able to receive information in a way they can understand. This should take into account that victims may not speak English, may have learning disabilities, or may otherwise need information in very simple, basic language.

## Co-design with survivors and their families

Councils should ensure that they are working with children and families with lived experience to design policies, assessments, procedures and evaluation that respond to child trafficking and slavery, and are working with survivors throughout the delivery of services.

## Multi-agency collaboration

An effective local response to child slavery and trafficking requires good multi-agency collaboration, underpinned by timely information sharing and a multi-agency risk assessment conference (MARAC) approach to agree appropriate actions to protect children.



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## Identification and referral

It is vital that councils ensure staff who may deal with suspected child victims of modern slavery have been trained to recognise and understand this and know how to respond. While the LGA and others are calling for this to be incorporated into early professional training, all safeguarding partners, including councils, should ensure that there is regular training on:

- extra-familial and current safeguarding risks
- knowing how to engage appropriately with children who are victims
- making informed and child-centred judgements about the context in which children are making decisions
- the most effective ways to support children who have become victims of modern slavery and prevent it from reoccurring.

Training on risks should cover the different types of modern slavery and indicators. Annex one of this guidance sets out a list of indicators of different forms of modern slavery. While children and young people might not show obvious signs of distress or abuse, they may often present a distinct set of indicators, which should be covered in training for professionals working with children:

- persistently going missing from school or home
- regularly being found out of the home area
- unexplained acquisition of money, clothes or mobile phone
- excessive receipt of texts/phone calls



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- relationship with controlling/older young people
- leaving home and care without explanation
- suspicion of physical assault/unexplained injuries
- gang association and isolation from peers or social networks
- significant decline in school results and performance
- self-harm or significant changes in emotional wellbeing.

Professionals in roles that may interact with child victims should be mindful of two key trends in identifying victims:

**Victims will often be reluctant to disclose to disclose this** – as with older victims of modern slavery, child victims may not identify as being victims as they have been groomed to by those exploiting them. Victims may also be scared to explain what is happening to them, for fear of what may happen to them or their families if they are found to have spoken to the police or other services.

**Child victims, particularly adolescents, have not always been recognised as victims by professionals** – perhaps because they do not present as we are used to young victims of child abuse appearing, or because they are perceived to have ‘chosen’ adult behaviours and lifestyles. For example, girls who have been subjected to child sexual exploitation have sometimes been viewed as promiscuous or inviting the abuse that occurred. Other victims have been groomed by their perpetrators into committing crimes, including serious violence, which can reduce the extent to which they themselves are seen as victims of a serious crime.



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It is important to remember that child victims cannot consent to engage in exploitation, including where criminal activity is committed as a direct result of their exploitation. Whereas adult cases need to be able to demonstrate the means (for example threat or coercion, deception, abuse of power) that led to the exploitation, there is no need to demonstrate a form of means in child cases, because they are not legally able to consent to the activity/form of exploitation that took place.

## Council pathways

Training should also cover the council's internal processes for handling suspected cases, particular where training is provided for officers working outside children's safeguarding. It is recommended that children's services are responsible for making referrals into the NRM. Other areas of a council should refer potential child victims via children's services, to make sure that any safeguarding measures can be put in place. It should be clear where within children's services concerns and cases should be referred to. As set out in section six, councils could consider whether to identify nominated professionals or leads to develop specialist knowledge in relation to trafficked children, and deal with child trafficking cases/act as advisers to other professionals.



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## NRM referrals

A specific area of training for professionals working with child victims should focus on the NRM process and referrals.

All suspected child victims of modern slavery should be referred into the NRM. Children do not need to give their consent to enter the NRM, but it is good practice to make them aware that this will happen, explain the benefits and possible outcomes, and discuss any concerns. Once a reasonable grounds decision has been made, the decision will be reported to the first responder and the child's social worker (if they are not the first responder), not to the child directly.

If an authority making a referral is an area where the independent child trafficking guardian (ICTG) scheme has been rolled out, a referral should also be made to the ICTG service at the same time.

If a child is part of a family in modern slavery, referrals still take place in the same way, and child safeguarding procedures should still be undertaken.

Sometimes there may be a dispute over whether the potential victim is a child. Under section 51 of the Modern Slavery Act, where a council has reasonable grounds to believe a person is under 18 then they will be treated as a child, until an age assessment is carried out. An age assessment should be commissioned where appropriate, but referral to the NRM should not be delayed.



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It is important that referrals to the NRM are good quality and contain enough information to progress the case, to avoid the need for referrals to be resubmitted. Councils can support this by:

- Providing a full set of basic information about the victim including name, date of birth and correct address details.
- Providing as much information about the exploitation as possible, setting this out chronologically where this is known. This should include the type/purpose of exploitation, as well as the action (movement) in child trafficking cases.
- Working with multi-agency partners to ensure a comprehensive picture, with information from all agencies involved in a particular case.
- Using neutral language that avoids implicit judgements about the victim's behaviour and reflects that children are unable to consent to any form of exploitation.
- Updating the referral as and when more information becomes available about a particular case: this should be sent by email ([nrm@modernslavery.gov.uk](mailto:nrm@modernslavery.gov.uk)) as referral forms cannot be updated once submitted. Professionals working with children may need time to work with a child (and other agencies) to get sufficient information to support a conclusive grounds decision, particularly where a child has experienced significant trauma or is in fear of speaking to authorities. Ensuring that appropriate support is put in place, and developing a positive relationship with a child victim upfront, are critical factors in enabling child victims to share information about their experience.
- Ensuring a named contact at the council who can be a point of contact for the case, and keeping this up to date if the relevant officer changes.



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Councils should ensure that all staff making referrals have been trained in how to make a good quality referral into the NRM. There are many resources available to provide guidance on this, including [on the LGA website](#), [guidance on NRM referrals from the Single Competent Authority](#), and [guidance from Barnardo's](#), who are contacted to provide the independent child trafficking guardian service.

## Supporting victims

Support for child victims of modern slavery is provided through normal child protection processes, rather than through the NRM, and this should continue as usual regardless of subsequent decisions made through the NRM. Support will clearly vary on a case-by-case basis: what is needed for an unaccompanied child trafficked from overseas is different to what is needed by a UK national child from a supportive family who becomes involved in criminal exploitation.

However, in all cases, appropriate support (including accommodation where required) should be put in place to help the victim deal with the trauma they may have suffered, and to minimise the risk of their returning to exploitation or of otherwise being harmed. This should be put in place as soon as possible and efforts made to develop a trusted relationship with the victim. In some cases, transfer to the care of another council or an out-of-area placement might be appropriate, to put distance between the child and where their traffickers expect them to be.



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If the child is in local authority care, the support provided should be detailed within the child's care plan. This should reflect specific risks that councils and carers will need to address, particularly the possibility of a child going missing from care. Figures for 2021 show that missing incidents were reported for nearly one in ten looked after children, but previous statistics from ECPAT suggested that nearly two thirds of trafficked children in local authority care go missing at some point; nearly a third of these go missing within one week.

Councils must make sure a strong multi-agency approach is in place to protect victims from going missing and experiencing further harm from their abusers. In particular, there should be a clear understanding between the local authority, the police and the child's carer(s) of roles in planning for this protection and responding if a child goes missing.

In the case of unaccompanied asylum seeking children, there should also be information in the care plan on the asylum seeking process to ensure that children are kept informed and well supported throughout the process, to minimise fear and uncertainty. If the child receives a negative asylum or immigration decision, discussions about their status will need to be handled sensitively and social workers should be alert to a heightened risk of the child going missing, taking all necessary steps to prevent this.

If a negative conclusive grounds decision is reached, councils should revert to their normal child protection assessments to identify what support is needed for the child.



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## ICTG service model

For independent child trafficking guardian (ICTG) roll-out areas, ICTG direct workers will be assigned to child victims with no parent figure in the UK on referral. The main aim and purpose of the ICTG direct worker is to complement the role of council social workers through:

- advocating in a guardianship capacity on behalf of the child, to ensure the child's best interests are reflected in the decision-making processes by councils and others involved in the child's care and support
- ensuring the child is protected from further harm, prevent possible repeat victimisation, re-trafficking or going missing, and promote the child's recovery
- supporting the child and helping them to navigate children's services and the immigration and criminal justice systems, as well as ensuring that their educational and health needs are met through liaison with the appropriate statutory agencies and public authorities.

The ICTG direct worker will be independent of the council, but councils must share information and pay due regard to them in taking decisions about the child. For children where there is a parental figure available in the UK, professionals working with them are able to draw on the expertise of the ICTG regional practice coordinator.

In areas that do not yet have the ICTG service, or where a child does not qualify for it, other agencies may be able to provide independent child advocacy services – for example [Barnado's](#), [The Children's Society](#) or [Refugee Council](#).



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## Planning for transition

Organisations working with victims, and councils themselves, have recognised that the transition from children's to adult services is a particularly challenging point for adolescent victims of slavery who are engaging with statutory services. The transition can mean a significant shift in the extent of support that is available and way it is provided. Some councils have taken steps to try to ease this transition by creating dedicated teams able to maintain more intensive engagement with former child victims.

Councils should also be aware that NRM consent will need to be sought from victims with live cases as they turn 18.

### Southend-on-Sea Borough Council: a transitional approach

#### The context and rationale for this initiative

Following the implementation of an adolescent team to work with those children and young people identified as being at most risk of exploitation in 2017, Southend-on-Sea became acutely aware that work with this group needed to take a longer-term view. Building trusted professional relationships with young people who had been groomed and exploited takes time, with consistent professionals involved, and it quickly became apparent that children engaged with the team received a high level of support. This was sometimes daily.



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However, when they became 18, the options for support and types of support available were vastly different. Adult systems did not necessarily fit nicely with this cohort, who in many ways were still children, except that they had now become 18 years old, though their needs had not changed. A panel process was trialled where this cohort could be linked into adult services. However, it was found that they would not attend appointments without support and would quickly get ‘closed’ by services. What was missing was a single professional who knew that young person and could take them to appointments, help them navigate the various systems, and to be their champion in the same way that support services worked for children.

### **Brief description of the work undertaken**

The decision was taken to mirror the children’s offer for adults. In the children’s service they are allocated both a social worker and an early help practitioner, and when their case can be de-escalated the early help practitioner keeps the child’s case open so that they can sustain changes. An adult social worker and adult support worker were recruited to work as part of the adolescent team and to jointly work with two cohorts of adults impacted by exploitation. Firstly, the transitional cohort, so those hitting 18 years old or within the 18-25 age bracket; and secondly the vulnerable adult cohort, which commonly meant those targeted by gangs and who had had their properties ‘cuckooed’.



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The initial pilot year of the project had three stakeholders: adult services, the children's service and the housing ALMO South Essex Homes (SEH), with adult services providing a social worker and SEH providing a housing officer to undertake the adult support worker role. After the initial pilot year, the adult support worker was employed directly by children's services to work within the adolescent team. The two staff members work very closely with the children's team to plan transitions. However, they also receive a number of referrals from the police county lines team, who are able to identify adults who are victims of exploitation and cuckooing. Housing also plays a huge part in the service, as they again are a key stakeholder when identifying potentially vulnerable people at risk of exploitation.

### What difference it is making?

This change in practice means, in essence, two cohorts of vulnerable adults receive a service that helps protect them from potential exploiters and provides them with valuable support services. The younger cohort benefit from a children's style high challenge/high support approach, where consistency and persistence is maintained and cases are not closed if a set number of appointments are missed.

### Lessons learned

Co-locating within a relevant children's team has distinct advantages, especially if it is exploitation focused. The ability to hear and contribute to office-based conversations about locations, county lines, missing episodes or gang landscapes provides staff with a good understanding of what is going on locally. However, this learning needs to be shared across wider adult services, for example by inviting the adult workers to team meetings and to undertake relevant training together.



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Undertaking joint training early on, especially around exploitation and trauma-informed practice, may support everyone working to the same principles.

Housing is a real core to many of these cases, whether it be the transitional cohort requiring accommodation or the older cohort of adults requiring support and protection from cuckooing. The knowledge of civil orders and housing allocations and relevant processes has been a distinct advantage in this role – there is a need to understand where these referrals are likely to come from and which services are likely to come across the adult cohort you are aiming to work with. Probation, housing (including local housing associations) and police are real key players and need to know about the provision and referral pathways available.

A key learning point would be about trying to set some identifiable outcomes from the outset. Setting KPIs for victims of exploitation is very difficult, however some of the noticeable outputs include acquiring secure accommodation, re-engaging this cohort with education or employment, signposting to specialist services such as mental health or substance use, working closely with probation officers to support them to manage court orders, and getting them away from their exploiters.

Getting partners on board and working with the same ethos is hugely important. For example if the police are viewing these individuals purely through a criminal eye and not as victims of exploitation, then it would be very difficult. Fortunately, Essex Police and the partner organisations have viewed these people as victims of exploitation, and this shared partnership ethos has made it easier to put the pathway into place.



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### Case study

Jay was known to children's social care due to his high risk of exploitation and involvement in county lines. He was referred to an adult support worker (ASW) as he approached the age of 18. Jay's relationship with his family had broken down, making him homeless by 18. He was associating with 14/15 years olds involved in county lines.

Jay was arrested following a violent offence and disclosed he was sleeping rough and had been involved in county lines. At this point he was referred to the ASW specialising in exploitation. Jay said he wanted help to move away from that way of life but felt trapped. The ASW brokered a conversation with police, and Jay disclosed intelligence regarding drugs and organised crime in the area. It was at this point that the extent of the exploitation was understood.

A housing support service fast-tracked interviews for other accommodation and Jay registered to claim Universal Credit. He also attended various apprenticeship workshops at the college, all accompanied by his ASW. When Jay needed to be placed in temporary accommodation out of the local area, due to safety concerns, he was contacted daily and visited twice weekly by his support worker. He was also linked in with therapy and other support services. Jay was supported to secure more permanent accommodation, and helped with this move. The ASW continued to visit him during this transition period to ensure he settled into the new area. Without the support provided, Jay would have fallen through the cracks in the system. Professionals feel he would have undoubtedly become more deeply involved in county lines and been exploited further.



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## Checklist for child trafficking leads

### Have you:

- Identified your council's modern slavery coordinator or lead team and made links with them to ensure join-up on issues relating to child victims of modern slavery?
- Agreed how suspected child victims of modern slavery and human trafficking (MSHT) should be referred into children's services (for example, normal child safeguarding routes or a dedicated MSHT approach) and published referral pathways?
- Agreed how child slavery and trafficking cases/NRM referrals will be managed within the council, for example by all children's social workers or by a dedicated team/ specialist team dealing with complex cases?
- Identified a lead professional to focus on understanding and sharing information about developing practice on contextual safeguarding and the response to child slavery and trafficking?
- Worked with public health and other services to estimate the scale of child trafficking within the local area and locations of specific risk?
- Agreed approaches to information sharing and multi-agency working with local partners including the police, non-maintained schools, health services and community/VCS partners working on MSHT issues?
- Reviewed local missing protocols against the latest practice?



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- Engaged with independent child trafficking guardians (ICTGs) and ICTG regional practice coordinators to hear about emerging and best practice?
- Worked with adult services to develop a supportive approach to transition for child victims of modern slavery who turn 18?
- Ensured that relevant staff receive training on:
  - types of modern slavery
  - indicators and how to spot the signs
  - specific needs and challenges of child victims of modern slavery
  - cultural competency and sensitivity
  - the NRM process
  - the council/department's internal processes for responding to cases of modern slavery, including referral pathways
  - any local multi-agency processes for dealing with suspected cases
  - key local partners and contacts.



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## Further resources

Home Office: [Modern Slavery Act statutory guidance](#)

E-learning on child victims of modern slavery

LGA: [‘Tackling child exploitation resources pack’](#)

Home Office: [‘Child exploitation disruption toolkit’](#)

Home Office: [‘Criminal exploitation of children and vulnerable adults: county lines guidance’](#)

Department for Education: [‘Care of unaccompanied migrant children and child victims of modern slavery: statutory guidance for local authorities’](#)

Skills for Care and Development: [‘Training framework for the prevention, identification, support and care of child victims and survivors of modern slavery and human trafficking’ \(and supporting resources\)](#)

Research in Practice: [tackling child exploitation research and evidence](#)

Independent Anti-Slavery Commissioner and Cumberland Lodge: [‘Practitioner responses to child trafficking: emerging good practice’](#)

The Children’s Society: [‘Debt bondage in a criminal exploitation and county lines context’](#)

Home Office: [‘Interim guidance for independent child trafficking guardians’](#)

UK Council for Internet Safety: [Challenging victim blaming language and behaviours when dealing with the online experiences of children and young people](#)

University of Bedfordshire and Durham University: [Scale-Up Toolkit | Contextual Safeguarding](#)



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# 8. Adult services and modern slavery

## Overview of councils' roles

Councils have the same broad role in relation to adult victims of modern slavery as they do for children, but the picture is arguably more complex. There are a number of different services that could become involved with an adult victim, and councils may come into contact with a victim at very different stages of their experience and recovery: before they consider whether to enter the NRM (or have chosen not to be referred into the NRM and a duty to notify referral has been made), while they are in the NRM, or afterwards. Coordination and collaborative working across councils, as well as with partner organisations working with adult victims, are critical to ensuring a joined-up approach that most effectively supports victims.



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The table below summarises how different teams support different elements of councils' work on modern slavery, and this is explored further in the following sections.

Council role	Council teams
<b>Identification and referral</b>	As first responders, councils are under a duty to identify suspected victims through an NRM referral or duty to notify referral. In relation to adult victims, councils will need to determine how this process will be managed, given that the council services – and partner organisations – involved with victims will vary from case to case. There will need to be clear referral pathways and responsibilities agreed for the NRM process, including gathering information, making referrals and dealing with reconsiderations as required, which will require working closely with external partners.
<b>Supporting victims</b>	<p>Unlike the framework for providing support for child victims of modern slavery (in all cases the responsibility of council children's services), councils' responsibilities with regard to adult victims are less clear cut, as accessing local council services is subject to eligibility criteria which some victims may not meet. Some councils have opted to go beyond their eligibility criteria in order to provide support to adult victims of modern slavery, but not all councils are able to do so.</p> <p>Housing and accommodation are the form of support that is most likely to be sought in relation to adult victims. The government's <a href="#">homelessness code of guidance</a> sets out a clear position that victims of modern slavery may meet the threshold for priority status on homelessness and housing applications. Further information on how homelessness and housing services can support victims of modern slavery can be found in the LGA document '<a href="#">Supporting victims of modern slavery: guidance and good practice for council homelessness services</a>'.</p>



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In terms of accessing adult social care, the Care Act 2014 sets out local responsibilities and roles for assessing and supporting adults with care and support needs. It also gave councils general duties which should lead to them promoting the wellbeing of the wider population in their communities.

The Care Act outlines local safeguarding responsibilities and roles for protecting adults assessed as having care and support needs which prevent them being able to protect themselves from abuse or neglect. Action to safeguard adults should include:

- promoting wellbeing and preventing abuse and neglect from happening in the first place
- ensuring the safety and wellbeing of anyone who has been subject to abuse or neglect
- taking action against those responsible for abuse or neglect taking place
- learning lessons and making changes that could prevent similar abuse or neglect happening to other people.

In meeting this duty, local areas will choose how safeguarding adult boards discuss and report on the many complex issues which can contribute to the wellbeing of their communities and the prevention of abuse and neglect. However, there may be other local partnerships that will take the lead on issues such as modern slavery, as well as other key issues associated with police and the criminal justice system. Safeguarding adults boards may support and contribute to partnership working in this area.



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	<p>Victims may also come into contact with services such as substance misuse, mental health, domestic abuse, welfare rights, probation, street outreach, supported accommodation and community nursing.</p> <p>Services should keep in mind that survivors can have fluctuating needs and/or may not initially disclose needs until a relationship of trust has been established. Therefore, with the consent of the victim, councils should work with other support agencies to build up a full understanding of support needs.</p>
<b>Disruption</b>	<p>Community safety teams lead councils' multi-agency work under the Crime and Disorder Act to tackle crime and disorder in their areas, including modern slavery and human trafficking.</p> <p>Other services such as regulatory services can support identification and disruption through sharing intelligence and using diverse powers to disrupt activity taking place in local businesses and premises.</p>

This guidance does not seek to replicate that available in the Government's [statutory guidance on the Modern Slavery Act](#), [statutory guidance on care and support](#), the [homelessness code of guidance](#), or in professional or local guidance on adult safeguarding. Instead, it aims to provide an overview of the issues councils will need to consider in framing their response to adult victims of modern slavery, and signpost to other useful resources.



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## Framing the overall approach

There is lots of helpful guidance available setting out the overarching principles that should govern how organisations work with victims of modern slavery.

Chapter one of the Human Trafficking Foundation's survivor and trafficking care standards sets out the following key principles (these are currently being updated):

- accessibility and non-discrimination
- human rights based approach
- holistic and victim-centred
- empowering
- freedom of thought, religion and belief
- multi-agency approach
- professional boundaries
- safe working approach
- trauma-informed approach.

The public health framework for modern slavery also sets out principles for how services should be delivered:

- empowerment
- trauma-informed practice
- peer-led support
- tailored and person-centred support across the recovery journey
- culturally competent.



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In designing their response to adult victims of modern slavery and human trafficking, councils should seek to embed the following core principles and features into their approaches.

## A trauma-informed approach

Working sensitively with all victims should be central to how councils and professionals respond. The [‘Trauma-informed code of conduct for all professionals working with survivors’](#), produced by the Helen Bamber Foundation, sets out guidance for how interactions with victims should be handled. The [Human Trafficking Foundation’s survivor care standards](#) also set out comprehensive guidance on providing support in an effective, person-centred way.

All teams working with victims will need to take account of the fact that being a victim of exploitation or modern slavery is a deeply distressing and traumatic experience which has lasting effects. They must ensure that their work with potential victims, from the first contact and risk assessment, takes account of the impact that this might be having. Working to put potential victims at ease through a supportive attitude and body language, developing trusted relationships and giving victims the space to reflect on and make decisions, will all help to support their interaction with statutory authorities. It should be recognised that many victims of modern slavery may be suspicious of interacting with statutory and other authorities.



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### Working sensitively with victims

Being a victim of exploitation or modern slavery can be a deeply distressing or traumatic experience, which can have lasting effects. Councils should make sure that their work with potential victims – right from the first contact and risk assessment – takes account of potential trauma and the impact that this might be having.

Councils can do this by:

- Working to put potential victims at ease, with a supportive attitude and body language.
- Making sure that the physical environment and immediate location is safe, and attending to immediate physical needs including pain, hunger, and sleep deprivation.
- Providing reassurance about confidentiality, and making sure that potential victims understand that information cannot be shared without their informed consent, unless there is an immediate safeguarding risk.
- Ensuring and checking that potential victims understand the process at every stage – this includes empowering potential victims by helping them to understand the support that they might be able to access, and highlighting where they have choice and agency.
- Ensuring that potential victims do not have to repeat their story multiple times, because recounting the details of their exploitation can be a traumatising experience. Councils should ensure that victims are only required to tell their story once, and that the modern slavery coordinator is in a position to share information with other partners where needed.



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- Building a trusted relationship – potential victims of modern slavery might not trust authorities, or might not self-identify as a victim of exploitation. As a result, it can take time for them to build the confidence to disclose their story and needs. It is therefore important that councils can provide continuity of support, including by assigning an individual, named single point of contact who is responsible for coordinating multi-agency case work for a given victim.

## Person-centred approach

Councils should aim to deliver a person-centred approach in which the response to individual victims of modern slavery is tailored to their specific needs and works with them collaboratively.

## Cultural competency and sensitivity

Many adult victims of modern slavery may be non-UK nationals and/or from a black and minority ethnic background. Cultural sensitivity and understanding, and the removal of unconscious bias, are therefore critical. The BME Anti-Slavery Network (BASNET) has recommended that all council practitioners working on this issue receive annual training on cultural intelligence, equality, diversity and inclusion. Research in Practice have produced [a framework for considering levels of cultural competence within relevant teams and organisations, and actions to advance this.](#)



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## Accessible

Services and support should be accessible to all victims of modern slavery, taking into account the diverse needs that they may have. Information will need to be provided in a way that victims can understand: victims may not speak English or could have other needs that impact their understanding. In particular, councils should consider how interpretation services can be provided safely (being mindful of previous cases where people providing interpretation services have been involved in trafficking and slavery themselves).

## Empowering

Responses to victims of modern slavery should be empowering and rights based, with the Human Trafficking Foundation noting that supporting individuals to regain trust in their ability to control their own lives is a crucial step towards reducing vulnerability and further exploitation. Supporting individuals to make their own choices, and providing support in a personalised way that recognises an individual's strengths, can help to promote empowerment.

One aspect of empowerment is informed consent. While there is a legal expectation that children are protected from physical or psychological damage, adults with mental capacity have a right to make their own choices, take risks, be free from coercion, and make decisions about their own safeguarding and other plans. Reflecting this, under current Home Office first responder guidance, a referral cannot be made to the NRM unless the adult gives informed consent to the referral; however a duty to notify referral must be made.



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Section 2.2.1 of the [survivor and trafficking care standards](#) defines informed consent as follows:

Informed consent means that the person concerned must be given all the information in terms of why an organisation or individual is concerned about them, an explanation of support available to them, and an understanding as to what accepting this support would mean. This should include exploring the benefits and risks as well as the likelihood of both of these. In addition, there should be a discussion as to any practical alternatives so that individuals are able to make an informed choice.

Victims' explicit and informed consent should therefore be a guiding principle in working with adult victims of modern slavery, most obviously in relation (although not limited) to deciding whether to enter the NRM. However, there have been examples of agencies encountering victims of modern slavery who have previously been referred to the NRM but were either unaware of this or did not know what the process had entailed, suggesting that their decision and subsequent experience could not have been an informed one. Allowing time to build understanding and secure informed consent is a vital part of working with victims, and one that councils need to reflect when developing their pathways and approaches.



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Victims should understand:

- what the NRM is
- what support is available through the NRM
- what the possible outcomes from referral are
- where their details will be sent and the approach to privacy of information
- that they can choose to enter or leave NRM support at any time.

Those working with survivors should ensure and check that potential victims understand the process at every stage, empowering individuals to understand the support that they might be able to access and highlighting where they have choice and agency.

Children with active referrals will need to provide consent for their NRM referral upon turning 18, so an approach will need to be considered to gain informed consent.



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The statutory guidance on the Modern Slavery Act states that it should be assumed that individuals have capacity to make a decision about whether or not to consent to enter the NRM. However, where there are doubts about capacity to make a decision, a mental capacity assessment can be undertaken.

Adults without mental capacity have legal safeguards under the Mental Capacity Act 2005 and in some circumstances must have the representation of an advocate or representative to act in their best interests (sections 2-4 of the Act). An independent advocate represents and supports an adult where the adult has ‘substantial difficulty’ in being involved in a safeguarding enquiry or review, and where there is no other suitable person to represent and support them.

If a person is deemed incapable of giving informed consent under the Mental Capacity Act 2005, a guardian should be appointed to help him or her make decisions. The person, however, should still be placed at the centre of the decision-making process. In such cases, the independent advocate would also support a victim with a decision regarding an NRM referral. Before a decision is taken in the best interests of an individual, it would be vital to consult with any other agencies involved in the care and support of the individual.



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## Survivor voice and input

Councils should ensure that they are working with victims with lived experience to design policies, assessments, procedures and evaluation that respond to cases of trafficking and slavery, and are working with survivors throughout the delivery of services.

## Partnership working and multi-agency collaboration

An effective local response to slavery and trafficking requires good multi-agency collaboration, particularly for adult victims where support may also be provided through MSVCC providers, anti-trafficking organisations or other charities, as well as through support funded by police and crime commissioners.

In recognition of this, some areas have developed multi-agency risk assessment conference (MARAC) approaches to support the response when a victim is identified locally. This is embedded in the [Welsh Government's modern slavery safeguarding pathway](#) and the [Human Trafficking Foundation's local authority toolkit](#) and [adult referral pathway](#). Similar approaches have been adopted by English councils. One example is the [West Midlands Anti-Slavery Network's pathway](#), while [Westminster City Council's multi-agency case conference approach](#) for victims identified through homelessness teams is outlined below.



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### Westminster/The Passage multi-agency case conference

The aim of the multi-agency case conference (MACC) approach is to provide proactive, preventative relief that helps to prevent re-trafficking and re-exploitation. When a potential victim is identified by The Passage (a homelessness support organisation) or within Westminster, a MACC is arranged within 48 hours, bringing together the following partners:

- The Passage
- Westminster Council adult social care team
- Westminster Council rough sleeping team
- an immigration advisor (if appropriate)
- an NHS nurse (homeless team) (if appropriate)
- police (if appropriate)
- pre-NRM safe house case worker (if appropriate)
- any other key workers from external agencies providing support to the potential victim.

The aim of the MACC is to agree an action plan for the potential victim, setting out the steps different partners will take, and it may cover the following issues:

- a risk and vulnerability assessment and wider needs assessment
- the health and mental health of the potential victim
- support provided by The Passage
- emergency accommodation and who is providing it
- capacity to consent
- referral into the NRM or duty to notify, and the lead first responder for this
- any legal issues (immigration status, involvement in criminality)
- whether the victim has children and what support is required.



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Whether a MARAC approach has been implemented or not, partnership working should be underpinned by timely information sharing about risks and concerns and collaborative working to protect victims. It is important to recognise that this can also include working with other councils, for example when the risks of remaining in a particular area may necessitate a victim seeking support in a different council area.



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## Working with the local VCS

Establishing links with partners, including local statutory and voluntary services, can help ensure a stronger response for victims of modern slavery in their areas, as well as more coordinated work on modern slavery overall.

As a minimum, it will be helpful for councils to understand which VCS partners are working with victims of modern slavery in their areas: this may be as part of the MSVCC (for example local safehouses or outreach support), but it may also involve work by anti-slavery organisations outside the MSVCC support framework. Clearly, these organisations will come into contact with victims of modern slavery, often before an NRM referral has been considered, and it will be helpful for them to understand how to link into the council in order for victims to be referred for any support to which they are entitled.

Equally, anti-slavery charities will be able to assist councils with specialist expertise and advice and in developing a better understanding of the needs of modern slavery victims. Knowing the map of anti-slavery charities operating in the local area, and having established links to them, will help to build and strengthen relationships and should facilitate a swifter and smoother response when dealing with victims, particularly at the point of identification or when an individual may be approaching exiting NRM accommodation.

Although information about some aspects of the MSVCC (for example the location of safehouses) is understandably sensitive, The Salvation Army are keen to develop closer links between their sub-contractors and councils. To find out about local MSVCC services in a local area, councils can contact The Salvation Army via [mst@salvationarmy.org.uk](mailto:mst@salvationarmy.org.uk)



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## Building time into victim support pathways

All of the above approaches mean that councils (and their partners) will need to build in sufficient time to their pathways to work with victims in an appropriate way, not least to build trust and rapport that makes it less likely victims will disconnect with services. It is unlikely that a council (or any other first responder) could, within a few days, identify a victim, refer them into the NRM and secure a reasonable grounds decision while taking a trauma-informed approach that works sensitively with victims.

Councils and partners will therefore need to consider how victims' needs can be supported from the point at which they first come into contact with the authority, but before/until they are able to access NRM or other accommodation (assuming they consent to an NRM referral, which many will not). This period has proved to be a consistent pinch point for councils in responding to modern slavery, and is therefore worth considering and planning for.

## Streamlining approaches to reduce stress and trauma

While recognising that initial work with victims requires time, councils should nevertheless think about how the management of their processes can reduce, or add to, the stresses placed on victims of modern slavery interacting with statutory and other services. Recounting details of their exploitation can be a traumatising experience for victims. Councils should ensure that information can be shared within teams so that individuals are only required to tell their story once, rather than to different staff members, as well as considering the scope for receiving information from partner organisations rather than



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from victims directly. Taking into account and obtaining information (with consent) from statutory and non-statutory organisations will enable councils to build up a full picture of a survivor's situation and needs, which may not otherwise be disclosed until a relationship of trust has been built with the council.

Schemes such as [Sheffield City Council's trusted assessor scheme](#) for housing applications are a good example of how councils have developed bespoke approaches that simplify processes for both survivors and victims.

Similarly, where an individual already has a conclusive grounds decision, or even a reasonable grounds decision with a conclusive grounds decision pending, council teams should consider whether it is necessary for them to provide the same information to the council to be recognised as a victim of modern slavery when the decision of the relevant competent authority could simply be recognised.

Once in receipt of all the information required, the speed and way in which councils make decisions can also reduce trauma for victims, with swifter decisions and clarity reducing stress and uncertainty. Delays, stress and uncertainty can lead to a deterioration in mental health, disconnection with services and an increased risk of individuals falling back into exploitation. Where councils have been able to develop consistent policies and approaches to victims of modern slavery that are not focused on individual needs, this can clearly support swifter decision making, although not all councils may be resourced to take this type of approach.



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## Training

It is vital that councils ensure staff who may deal with suspected victims of modern slavery have been trained to recognise and understand this and know how to respond.

For officers who may observe or come into contact with cases of modern slavery, but are unlikely to lead councils' engagement with and support for victims (for example frontline officers in regulatory or customer services), training should cover:

- types of modern slavery
- indicators of modern slavery and spotting the signs (see annex one of this document and section three of the [statutory guidance](#))
- an overview of the UK framework for responding to modern slavery, including the NRM process
- the council's processes for handling suspected cases and specifically where concerns should be raised internally (and externally if appropriate).

For officers in services that may work more closely with victims – such as adult safeguarding and social care – the LGA and others are calling for modern slavery to be incorporated into early professional training and continuing professional development, so that there is career-long understanding of this and similar safeguarding risks.



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Current approaches to modern slavery specific training and continuing professional development should cover:

- types of modern slavery
- indicators of modern slavery and spotting the signs (see annex one of this document and section three of the statutory guidance)
- detailed overview of the NRM process and making good quality referrals
- the council's processes for handling suspected cases and specifically where concerns should be raised internally (and externally if appropriate)
- the support that may be available for victims of modern slavery through the council, MSVCC or other partners
- trauma-informed practice, cultural competency and the overarching principles outlined above.

## Referral pathways

Councils will need to determine how they will handle suspected cases, build appropriate referral pathways around this approach and ensure relevant staff are made aware of these through training.

Council pathways should set out how different teams are expected to engage with external partners, and who will take responsibility for sharing intelligence and planning. For example, officers working in frontline regulatory services who identify possible victims of modern slavery should be clear on how this intelligence will be shared with the



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police and agencies such as the Gangmasters and Labour Abuse Authority, as well as internally, to develop any plans to disrupt modern slavery.

In terms of pathways where victims have presented to the council, the picture is more complex for adults than for children, as services including homelessness, housing, adult safeguarding, social care and community safety may all play a role in individual cases, depending on the circumstances. The pathway should set out who will take responsibility for making NRM referrals and whether these will be submitted by nominated professionals or a wider cohort of officers, as seen in the [West Midlands adult pathway](#) and the [Human Trafficking Foundation's modern slavery toolkit](#).

## NRM referrals

Unlike children, adults need to consent to enter the NRM (for children who turn 18 while they are in the NRM, consent will need to be gained to remain in the NRM). Training will therefore need to equip relevant staff to fully understand the NRM and be able to convey this to victims they may be working with, as well as to make good quality NRM referrals. West Midlands Anti-Slavery Partnership have developed a helpful [NRM explanatory document](#) to support work with victims, while the Government's [training for first responder organisations](#) provides an overview of the process.

Councils currently submit relatively few NRM referrals relating to adult victims compared to child victims. However, it is important that referrals to the NRM are good quality and contain enough information to progress the case, to avoid the need for referrals to be resubmitted.



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Councils can support this by:

- Providing a full set of basic information about the victim including name, date of birth and correct address details.
- Providing a professional judgement about how modern slavery has been perceived and as much information about the exploitation as possible, setting this out chronologically where this is known. For adult victims, this should include:
  - (in trafficking cases only) the action: how did the person get into the situation (for example, recruitment, transport, harbouring)
  - the means: why did the person stay in the situation and what stopped them from leaving (for example, threat, coercion, abuse of power, position of vulnerability)
  - the purpose: a description of what the situation/exploitation was (for example forced labour, sexual exploitation, forced criminality).
- Working with multi-agency partners to ensure a comprehensive picture with information from all agencies involved in a particular case.
- Using neutral language that avoids implicit judgements about the victim's behaviour.
- Updating the referral as and when more information becomes available about a particular case: this should be sent by email ([nrm@modernslavery.gov.uk](mailto:nrm@modernslavery.gov.uk)) as referral forms cannot be updated once submitted. Professionals working with victims may need time to work with the individual (and other agencies) to get sufficient information to support a conclusive grounds decision. Ensuring that appropriate support is put in place, and developing a positive relationship with a victim, are critical factors in enabling victims to share information about their experience.



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- Ensuring a named contact at the council who can be a point of contact for the case, and keeping this up to date if the relevant officer changes.

## Supporting victims

There are two main pieces of legislation outlining the support which councils may provide to adult victims of modern slavery. As outlined in section six and elsewhere in this document, this can be a challenging area for councils that do not have access to, or a budget to commission, emergency accommodation options for victims. Again, as noted in section six, proactive planning to consider how councils will address difficult cases involving victims with no recourse to public funds, or who otherwise do not fall within councils' responsibility, is recommended to improve the response of councils when victims present.

## Housing Act 1996

Under the Housing Act 1996, local housing authorities may owe victims of modern slavery a range of duties.

- **Prevention/relief duty:** victims of modern slavery who are in the NRM process will only be exited from the MSVCC where they are able to. MSVCC support continues, in part or in full, until a victim no longer has any recovery needs, or until other services (such as those provided by the NHS, councils or the Department for Work and Pensions) can meet their ongoing needs. During this time, victims might be owed the prevention or relief duty, such that councils must take reasonable steps



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to try and prevent their homelessness or relieve it if they are already homeless. The homelessness code of guidance suggests that councils should maximise the chances of successfully preventing homelessness by establishing arrangements with NRM support providers for early identification.

- **Duty to provide interim accommodation:** victims of modern slavery might already be homeless when making their homelessness application. If local housing authorities have reason to believe that applicants may be homeless, eligible for assistance and in priority need, they should ensure that interim accommodation is available. This might apply during the period following a referral to the NRM, while applicants are still waiting for an initial reasonable grounds decision, or while the local housing authority is carrying out its enquiries.
- **Main homelessness duty (owed to some of those in priority need):** people who have been victims of trafficking and modern slavery may be vulnerable, and therefore under the homelessness code of guidance may have a priority need for accommodation. The guidance states that local housing authorities should take advice from specialist agencies including MSVCC support providers, drug and alcohol services, local charities and the police, who are supporting applicants.

The homelessness code of guidance was updated in summer 2021 specifically to reflect these duties more clearly. The updated document also highlights that homelessness applicants may have been forced to leave the area where they have a local connection. It states that local housing authorities must not refer applicants to other authorities if they would be at risk of violence or domestic abuse in that local area. It also specifies that councils should take into account advice from specialist agencies providing support to an applicant.



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## Care Act 2014

The Care Act 2014 sets out local responsibilities and roles for assessing and supporting adults in need of care and support. It outlines how councils should carry out a needs assessment where it appears that an adult may have care and support needs. Key to this assessment is meeting eligibility criteria around how ‘a physical or mental impairment or illness’ impacts on being unable to achieve certain specified outcomes such as getting dressed or preparing food, and whether this then has a significant impact on wellbeing.

If the individual is eligible for support under the Care Act, the Act is clear that it is for local authorities to decide what support or services people are eligible for when they are assessed as having care and support needs, dependent on their financial circumstances. The ‘care and support planning process’ is used to help decide the best way to meet the person’s needs, the cost of arranging the necessary care and support for that person, and where the care should be provided.

The Act also sets out local responsibilities and roles for protecting adults assessed as having care and support needs from abuse or neglect, for the first time in legislation.

Adult safeguarding duties apply to any adult who:

- has care and support needs as defined by the Act
- is experiencing, or is at risk of, abuse or neglect
- is unable to protect themselves because of their care and support needs.

Under the Act, local authorities must make enquiries, or cause others to do so, if they



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believe an adult is experiencing, or is at risk of, abuse or neglect. Commonly referred to as a 'section 42' enquiry/duty, this should establish whether any action needs to be taken to prevent or stop abuse or neglect and, if so, by whom.

Although modern slavery is recognised as a category of abuse, victims of modern slavery may not necessarily have the impairment or injury that would meet eligibility for care and support under the Act. However, there may be victims of modern slavery identified via local safeguarding processes; and there may be victims of modern slavery who are subsequently identified as having care and support needs, whether their needs are eligible and/or met by the local authority or not, and thus will be entitled to support under current legislation later in the process.

### Adult safeguarding

As set out under the Care Act, councils should conduct a section 42 safeguarding enquiry where a council has reasonable cause to suspect an adult in its area has need for care and support, is experiencing or is at risk of abuse or neglect, and as a result of those needs is unable to protect themselves against the abuse or neglect or risk of it.

Eligibility regulations define an adult's needs as arising from, or being related to, a physical or mental impairment or illness, as a result of which the adult is unable to achieve two or more of the outcomes from a specified list, and as a consequence of which there is likely to be a significant impact on the adult's wellbeing.



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While the majority of these outcomes are physical, others relate to the ability to maintain relationships or access work. Many anti-trafficking organisations argue that victims of modern slavery will have care and support needs as a result of the mental trauma they have experienced due to modern slavery, which will impact on their ability to achieve the specified outcomes under the Care Act regulations. Some councils have reached a view that they will automatically raise a section 42 safeguarding enquiry and treat victims of modern slavery as having care and support needs. However, given the pressures on the social care system, other councils are unable to resource this more expansive interpretation and therefore, in line with eligibility criteria, will assess individual victim's needs on a case-by-case basis.

Whichever approach they are able to take, councils should recognise that they have a role in protecting vulnerable adults at risk. They should work with their partners to develop other routes which ensure that adult victims of modern slavery who are not eligible for support under the Care Act are helped to obtain any other support from the council they are eligible for, and are signposted to any other support available locally.

## A flexible, partnership-based response

Councils should develop responses and pathways for victims that can be flexed depending on the specific circumstances of each individual: for example whether or not they choose to enter the NRM or have already exited it when they come into contact with the council, and whether a victim is eligible for support under the Housing or Care Acts.



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Critically, councils should not assume that they will be able to rapidly refer an individual into the NRM (and therefore MSVCC accommodation). This is because:

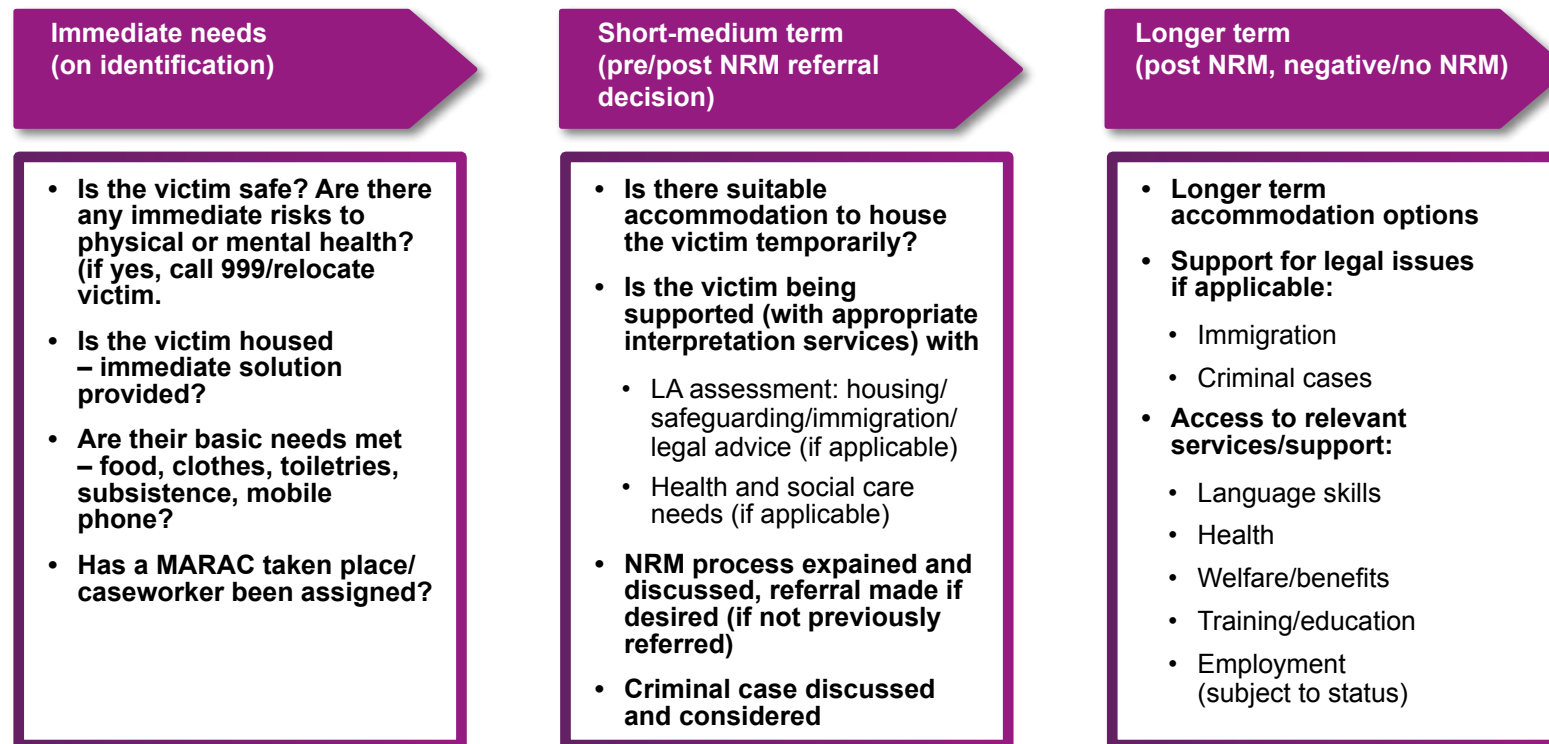
- it can take time for victims to decide that they wish to enter the NRM
- once a referral has been made, it may be several days before a positive reasonable grounds decision is secured, enabling a victim to access MSVCC accommodation (although The Salvation Army can be contacted in cases where a victim is destitute and ineligible for council accommodation)
- a referral may result in a negative reasonable grounds decision (and a council could have a role in gathering further information and asking for reconsideration of an NRM decision it believes to be incorrect)
- if a victim is already in appropriate accommodation (such as council accommodation, asylum accommodation or other safe, secure and adequately furnished accommodation) and is safe to remain there, they would usually remain at that accommodation unless a needs-based assessment revealed a need for MSVCC accommodation
- many adult victims do not consent to enter into the NRM at all
- councils may encounter victims of modern slavery after they have exited the NRM process.



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Councils should therefore consider how their pathways can help to meet the needs of victims in all these different circumstances, rather than assuming that accommodation or other support will be available from the MSVCC. Councils will need to decide which teams are responsible for developing and owning/overseeing a pathway which may cut across different services.

The broad timeline below provides a summary of the considerations for councils and their partners at different stages of a victim's journey/recovery.



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As set out earlier in this document, working with local partners and specialist anti-trafficking organisations will be essential to supporting the needs of victims, especially for those ineligible for council support (but also generally, as councils do not have the specialist expertise to deal with the complex casework needs of many victims of modern slavery). Many councils and other statutory agencies have therefore developed close links (including commissioned services) with local anti-trafficking organisations who may be able to provide specialist case workers or accommodation support for victims not eligible for council housing support. Additionally, in some areas, police and crime commissioners have funded short-term accommodation options with wraparound support for victims while they consider whether to enter the NRM.

The Human Trafficking Foundation has developed [a map of providers working in different areas](#).

Further guidance is provided in the ‘accommodating potential and confirmed victims of modern slavery’ section of the LGA’s [guidance and good practice for homelessness services](#), while the West Midlands Anti-Slavery Network, Birmingham City Council and SIFA Fireside Adult Homeless Hub in Birmingham have developed an [adult modern slavery pathway](#) for national use which provides a comprehensive basis for councils and local partners to consider in developing their own pathways.



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## Victims with no recourse to public funds

Some victims of modern slavery will have no recourse to public funds (NRPF). NRPF is a term used for people subject to immigration control and have no entitlement to welfare benefits, Home Office asylum support or to public housing. People who have NRPF could include illegal entrants, visa overstayers, asylum seekers awaiting a decision, refused asylum seekers, people who have leave to remain but with a NRPF condition attached, and people from EEA countries without settled status or pre-settled status. Data from 68 councils across the UK from NRPF Network indicated 3200 households with no recourse to public funds were provided with accommodation and financial support at a collective annual cost of £57 million in 2020-1.

There are statutory provisions which require councils to provide some people with NRPF with housing and/or financial support in order to prevent homelessness or destitution. This assistance can be provided to adults eligible for care and support as defined by the Care Act due to a disability, illness or mental health condition; to families in order to prevent children becoming destitute; or to young people who were formerly looked after by a local authority, for example, because they were an unaccompanied asylum seeking child or other separated migrant child.

Victims of modern slavery with NRPF who do not fall into those categories will have no specific entitlement to statutory support. However, there will be a strong correlation between victims of modern slavery and people who are NRPF, making it likely that councils will need to respond both collectively and to individuals in these circumstances. As part of a wider corporate approach to NRPF, councils can proactively develop an approach to how they will respond to victims of modern slavery with NRPF.



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Where individuals have NRPf, councils can consider the following options:

- Supporting individuals to consider entering the NRM and access MSVCC support.
- Signposting to VCS support; this could be via anti-trafficking organisations or VCS organisations that provide housing for destitute asylum seekers, refugees, and people with no recourse to public funds, for example through hosting schemes or accommodation projects (such as through the [No Accommodation Network](#)).
- Signposting to solicitors/VCS organisations who can support the person to be considered under international duties and potential breaches of convention or community rights.
- Use the NRPf Network's [resources for councils](#) to make case by case assessments of eligibility, [recommendations](#) around service planning and to share practice via their [regional networks](#)
- In recent years, Rough Sleeping Initiative funding and the COVID-19 'Everyone in' initiative have been used to provide housing support to people who are homeless and don't have NRPf, with some areas commissioning specific accommodation offers for people with restricted or no eligibility ([See 'Unlocking the door'](#)).
- A recent report by [Homeless Link](#) set out legal powers councils could use to support [people with restricted eligibility who are homeless while remaining within the law](#). It argues that section 2B of the NHS Act 2006 and section 180 of the Housing Act 1996, under certain broad conditions and circumstances, allow councils to fund and/or provide support and accommodation to non-UK nationals with restricted or unclear eligibility for public funds.



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## Human rights assessments

Councils should be aware of the possible need to undertake a human rights assessment of an individual's needs in some circumstances.

While some legislative frameworks (such as the Housing Act 1996) are not subject to any human rights exceptions, human rights implications may be more relevant in other circumstances.

Schedule 3 to the Nationality, Immigration and Asylum Act 2002 prohibits the provision of certain support under the Children Act 1989, Care Act 2014 and Localism Act 2011 to people with specific immigration status. However, it is subject to an exception, and does not prevent the exercise of a power or the performance of a duty if that is necessary for the purpose of avoiding a breach of a person's rights under the European Convention of Human Rights (ECHR).

Article 4 of the ECHR (the prohibition of slavery and forced labour) has been interpreted as involving a positive obligation to ensure a framework for the protection and support of victims.

In some cases where Schedule 3 applies it may be clear that a victim's circumstances are not such that there is any risk of a breach of their Convention rights even if support or assistance is refused. However, this may not be the position in other cases, and it may therefore be considered that, if a refusal of support may result in a victim of modern slavery becoming at risk of re-trafficking, then a human rights assessment may be required.



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## Guidance on NRPF/restricted eligibility

As flagged above, the [No Recourse to Public Funds Network](#) provides a suite of guidance documents and training materials for council officers working with people with NRPF, which councils can draw on in their work with people who are victims of modern slavery and have NRPF.

Additionally, councils may also find it useful to consider the recommendations of Homeless Link's recent report '[Unlocking the door: a roadmap for supporting non-UK nationals facing homelessness in England](#)'. This report makes a series of recommendations for councils and central government on providing accommodation to rough sleepers with restricted eligibility, something it acknowledges is a significant challenge for councils. The report highlights many similar themes to this guidance (such as multi-agency, person-centred, trauma-informed and culturally sensitive support) as important support factors, alongside quality immigration advice. Its executive summary sets out nine recommendations that councils could consider to strengthen their approaches to this issue.

## Dedicated support for victims of modern slavery

Where councils have found the budget to fund them, dedicated modern slavery teams have proved an effective approach to supporting victims that help address some of the challenges of trying to navigate complex systems into which modern slavery doesn't fit neatly and/or where support might not be able to be accessed.



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## Nottingham City Council Slavery Exploitation Team

The Slavery Exploitation Team (SET) is a dedicated team of officers who work with partners to identify and tackle modern slavery and trafficking and offer support to survivors. The team's work has recently expanded from the city of Nottingham to include a number of neighbouring districts.

The team comprises a manager, two case workers and a business support officer. It was set up in 2018 as part of a Home Office pilot looking at post-NRM support for survivors of modern slavery. When the pilot programme was disrupted by a legal case that saw fewer survivors exit the NRM, the pilot funding was used to strengthen the team and develop a multi-agency approach to identification, prevention and management of cases. Given the successful impact of the team, it was agreed, following the end of the pilot in 2019, that the team should be extended. It is jointly funded by the council and Police and Crime Commissioner for Nottinghamshire.

The team fulfils a number of functions:

- acting as the single point of contact on modern slavery for Nottingham City Council and partner agencies
- managing a slavery exploitation risk assessment conference (SERAC) approach, bringing together statutory and non-statutory agencies to discuss suspected or known cases and plan a joint response to manage risk and intervene
- triaging referrals, liaising with other agencies and conducting low-level investigations
- undertaking awareness-raising sessions and offering specialist guidance to professionals.



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One of the main benefits of the work of SET is that it provides a function to look at cases where initial concerns or referrals don't meet Care Act thresholds or provide enough evidence for police interventions. The team collates information to build a bigger picture, to enable thresholds to be met for statutory interventions and to further understanding of this issue across the partnership

The SERAC model creates an instant response to help safeguard and tackle criminality while holding agencies accountable, and provides a single point of contact for agencies. It is well supported by managers from a variety of agencies and the team receives referrals from sources including, but not limited to, Nottingham University Hospital, the MARAC, partners in community protection and adult safeguarding, the community forensics team, fire and rescue, the police, housing providers and POW (a local charity supporting sex workers). SERAC meetings take place on a monthly basis and usually involve looking at six to 10 cases.

Outside of meetings, the team triages referrals as they come through; this may involve looking at police data (the team is co-located in Nottingham's central police station and has access to police data) and speaking with adult safeguarding/children's services to understand any previous background to the case. This may lead to a referral to the police for a response or discussions with other agencies who may be able to help. A strategy meeting may be called in advance of the next planned meeting if necessary.



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Outcomes supported by the SET team include: referrals into the NRM; moving victims into areas identified as safe by police colleagues; implementing suitable support (finances managed by money carers, substance misuse support, mental health support, referrals to charities such as POW); securing appropriate accommodation; increased security (alarms, place of interest markers, 'safe and well' visits from community protection officers); safety planning; capacity assessments; safeguarding and other referrals; identification and referral to the most appropriate advocate; safe return to victims' home countries; ongoing monitoring; supporting police investigations; arrests of criminals under the Modern Slavery Act, and civil actions.

Other areas have commissioned dedicated accommodation for victims of modern slavery. For example, the West Midlands Anti-Slavery Network 'SafePlace' project, funded by the West Midlands Police and Crime Commissioner, provides up to 10 days' safe accommodation for male survivors post exploitation/pre-NRM, providing time to access emergency support needs and information on rights and entitlement, and to make a decision on whether to enter the NRM.



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## Cuckooing

‘Cuckooing’ is a form of exploitation that has grown in prominence over recent years and is often associated with county lines drug dealing. Cuckooing involves an individual or group of people taking over a person’s home and using it to facilitate exploitation. Most commonly the home will be used to use, store or deal drugs, but it can also be used to store stolen or illegal goods or by men and women selling sexual services.

Anyone can be a victim of cuckooing; however, often the victim is vulnerable and will be offered something, such as drugs, alcohol or friendship, in return for allowing perpetrators to use their property. Vulnerable groups include class A drug users, adults with physical or mental health problems, people with learning difficulties, people who misuse other substances such as alcohol, those recently released from custody and the elderly.

Victims are often subject to threats by perpetrators as a means of control. Debt bondage, where adults are told they must continue to make their property available and/or work to pay back a debt owed for drugs, is a common theme in cuckooing, along with the threat of violence. Sometimes victims will become homeless after being forced to leave their address in fear of violence from gang members. Gangs often move to and/or between different addresses in an effort to evade detection. Vulnerable adults with premises are often exploited repeatedly by different gangs, sometimes within a short period of time.



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## Understanding cuckooing and awareness raising

It is important that relevant professionals (primarily in councils, housing associations and the police), the public and potential victims understand the risks of cuckooing and can recognise the indicators. Signs that cuckooing may be going on at a property include but are not limited to:

- an increase in people entering and leaving a property
- an increase in cars or bikes outside
- an increase in anti-social behaviour
- increasing litter outside
- people coming and going at strange times
- damage to the door/the door propped open
- unknown people pressing buzzers to gain access to the building
- the person who owns/lives in the property not leaving their home, or, if they have left the home, looking anxious or distracted.

Without understanding and awareness of cuckooing, the indicators above may be treated simply as anti-social behaviour, without work to tackle the perpetrators and support the victim. Councils and partner agencies have begun to take a differentiated approach to anti-social behaviour linked to domestic abuse, and there is a need for a similar approach in relation to cuckooing, so the root causes of the issues are addressed and victims protected.



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In terms of awareness raising with potential victims, Thames Valley police worked with housing associations to incorporate cuckooing into the tenancy sign-up process, so that tenants received an induction highlighting the risks and signs of cuckooing. Also within the Thames Valley area, Oxford City Council have developed the 'NEST' acronym to encourage members of the public to identify and assist victims of cuckooing, as follows:

- Notice the signs: look out for your neighbours, especially if there has been a change in behaviour.
- Evidence your concerns: make a note of your concerns, times, dates, what has happened and the identity or names of people coming in and out.
- Stay safe: it is important you are safe, so do not approach any of the people you believe may be cuckooing your neighbour or take photographs.
- Tell the local authority and the police: report your concerns online and this information will go to the anti-social behaviour investigation team and the police, who will follow up.

## Disruption tactics

There are a range of enforcement activities that councils can use, in partnership with the police, to disrupt perpetrators. While the simplest approach might seem to be to move victims to another location, this may simply move the problem elsewhere. Unless it is for a victim's own safety, it can be better to work with them to support them to stay in their home and prevent them from being re-victimised. It is important to remember that victims will often be scared that asking for help may result in them losing their homes, so they should be offered reassurance that this will not happen and that they will receive support.



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Some councils use closure orders which restrict who can enter a property. The Anti-Social Behaviour, Crime and Policing Act 2014 allows the police and councils to request the closure of premises associated with nuisance or disorder. They can issue a closure notice for a maximum of 48 hours, but they can also apply to the magistrate's court for a closure notice up to a maximum of six months overall, and this can prohibit specified individuals from entering the property. Breaking a closure order is a criminal offence punishable by imprisonment, meaning police can immediately arrest unwanted people found in a home with a closure order on it. As well as disrupting the exploiters, this also gives councils the opportunity to support the victim and take steps to prevent any further exploitation from occurring.

Other disruption tactics could include arresting perpetrators for other issues, such as drug possession or drug dealing. It may also be possible to pursue a slavery and trafficking risk order. However, this can be quite challenging without robust evidence and the victim's cooperation.

Regular visits to a property prior to any enforcement action may also be an effective disruption tactic, as it could make the perpetrator feel that it is too risky to remain in the property.



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## London Borough of Harrow: disruption approach

Harrow Council's community safety unit worked with the local police and other partners to take enforcement action against a 'cuckooing' case in the local area. Harrow convenes daily violence and exploitation reduction meetings which involve colleagues in education, youth offending, social workers, the multi-agency safeguarding hub, police and others. These meetings are used to review high-risk incidents in the local area, often involving serious violence, and identify problematic areas and discuss interventions.

Through this work, they identified one address where they had concerns about the occupant's wellbeing. The owner of the property was drug and alcohol dependent and vulnerable, and there were concerns that he was being exploited by perpetrators who were using his home to deal drugs and participate in other illegal activities and antisocial behaviour.

Harrow held a multi-agency meeting, which was chaired by the community safety team and involved other colleagues such as the police, adult services and mental health, to develop an action plan to support the individual and disrupt the perpetrators. They also realised the individual had mortgage arrears, and contacted his bank and mortgage provider to help him.



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The victim was reluctant to engage with adult services and continued to allow the perpetrators into his home to participate in illegal activities. To tackle this, Harrow sought a partial premises closure of the victim's home which was implemented by the magistrate's court. This allowed the victim to remain at home and only allowed specified family members to visit him, alongside emergency services, therefore preventing the perpetrators from visiting the premises. The partial closure order of three months was agreed by the court immediately, due to the multi-agency and holistic approach that was taken to support the victim.

The police checked the property regularly and incidents of anti-social behaviour began to reduce. Due to this success, the council sought a further three-month extension which was granted by the court. After a six-month period, complaints from residents about anti-social behaviour stopped. The council continued to offer support to the victim during this time. The police were able to arrest some perpetrators and issued criminal behaviour orders to others to further safeguard the victim.

Harrow has found partial premises closures to be an effective way of tackling cuckooing, having successfully applied for several in a short period of time to great effect. This, alongside other positive interventions such as mental health, social care, financial services support and drug and alcohol treatment services, have disrupted perpetrators and supported victims in the area. Officers at Harrow Council worked closely with councillors to keep residents informed of enforcement activity to tackle anti-social behaviour.



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### Oxford City Council: a preventative approach

Oxford City Council has a monthly multi-agency meeting to discuss cuckooing and people who may be at risk of exploitation. During these meetings, officers identify specific areas of the city that might be at risk of cuckooing and discuss what preventative approaches can be taken to safeguard residents. These meetings enable the effective sharing of intelligence between agencies. For example, the police often put 'red flags' on certain addresses where there are concerns about cuckooing so that if they get any reports related to that address, they are able to respond immediately.

Oxford City Council and Thames Valley Police have also developed a cuckooing toolkit so that officers have a checklist to go through when they are called out to a potential case. This ensures there is a consistent response in enforcement and supporting victims. Other materials have also been produced which provide information to victims and give further guidance to professionals. There is a dedicated section of the council's website which focuses on cuckooing.



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## Checklist for services that may work with adult victims of modern slavery

### Have you:

- Identified your council's modern slavery coordinator or lead team and made links with them to ensure join-up on issues relating to adult victims of modern slavery?
- Agreed how suspected adult victims of modern slavery should be referred into relevant services (such as housing and adult safeguarding teams) and published referral pathways?
- Agreed how adult slavery and trafficking cases/NRM referrals will be managed within the council and how data on this will be collected?
- Considered whether to identify lead professionals to focus on modern slavery issues within key services?
- Proactively discussed and agreed an organisational approach to challenging cases/victims with NRPF?
- Agreed approaches to information sharing and multi-agency working with local partners including the police, health services and community/VCS partners working on modern slavery and human trafficking issues, including MSVCC sub-contractors?
- Developed collaborative local pathways for supporting victims of modern slavery that can be adapted to the individual circumstances of different victims?



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- Worked with children's services to develop a supportive approach to transition, for child victims of modern slavery who turn 18?
- Agreed needs and risk assessment processes for victims of modern slavery?
- Ensured that relevant staff receive training on
  - types of modern slavery
  - indicators and how to spot the signs
  - cultural competency and sensitivity
  - the NRM process
  - the council/department's internal processes for responding to cases of modern slavery, including referral pathways
  - any local MARAC style/multi-agency processes for dealing with suspected cases
  - key local partners and contacts.



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## Further resources

Home Office: [‘Modern slavery statutory guidance for England and Wales’](#)

Home Office: [national referral mechanism guidance](#)

Home Office: [first responder training \(policingslavery.co.uk\)](#)

Human Trafficking Foundation (HTF): [map of survivor support services](#)

HTF: [London directory of survivor support services](#)

West Midlands Anti-Slavery Network: [adult modern slavery pathway partnership template](#)

West Midlands Anti-Slavery Network: [NRM explanatory document](#)



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# 9. Housing/homelessness services and modern slavery

## Overview of councils' roles

There are many crossovers between housing/homelessness services and modern slavery. Firstly, people who are homeless may be more vulnerable to becoming victims of modern slavery, particularly if they have additional support needs such as substance misuse. Secondly, victims of modern slavery are vulnerable to becoming homeless as a result of their exploitation, either due to a lack of social networks or because of a lack of available accommodation after exiting the national asylum support service, leaving them vulnerable to re-exploitation. And finally, housing support is the type of support that adult victims of modern slavery are most likely to seek from councils. For all these reasons, housing/homelessness services are likely to come into contact with victims of modern slavery.



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Council role	Council teams
<b>Identification and referral</b>	Housing and homeless teams may come across victims of modern slavery seeking to access housing support from the council. Staff therefore need to be familiar with indicators of modern slavery and know how to respond and refer cases.
<b>Supporting victims</b>	<p>Under the Housing Act 1996, local housing authorities may owe victims of modern slavery a range of duties.</p> <ul style="list-style-type: none"> <li>• Prevention/relief duty: victims of modern slavery who are in the NRM process will only be exited from the MSVCC where they are able to. MSVCC support continues, in part or in full, until a victim no longer has any recovery needs, or until other services (such as those provided by the NHS, councils or the Department for Work and Pensions) can meet their ongoing needs. During this time, victims might be owed the prevention or relief duty, such that councils must take reasonable steps to try and prevent their homelessness or relieve it if they are already homeless. The homelessness code of guidance suggests that councils should maximise the chances of successfully preventing homelessness by establishing arrangements with NRM support providers for early identification.</li> </ul>



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- Duty to provide interim accommodation: victims of modern slavery might already be homeless when making their homelessness application. If local housing authorities have reason to believe that applicants may be homeless, eligible for assistance and in priority need, they should ensure that interim accommodation is available. This might apply during the period following a referral to the NRM, while applicants are still waiting for an initial reasonable grounds decision, or while the local housing authority is carrying out its enquiries.
- Main homelessness duty (owed to some of those in priority need): people who have been victims of trafficking and modern slavery may be vulnerable, and therefore under the homelessness code of guidance may have a priority need for accommodation. The guidance states that local housing authorities should take advice from specialist agencies, including MSVCC support providers, drug and alcohol services, local charities and the police, who are supporting applicants.

The homelessness code of guidance was updated in summer 2021 specifically to reflect these duties more clearly.

The updated code of guidance also highlights that homelessness applicants may have been forced to leave the area where they have a local connection.



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	<p>For example, victims may need to move area if the previous place they lived in was unsafe due to a risk of exploitation, or they may have moved for NRM accommodation, so they may have limited connection with an area. The guidance states that local housing authorities must not refer applicants to other authorities if they would be at risk of violence or domestic abuse in that local area.</p> <p>Finally, victims with no recourse to public funds who are not owed a housing duty under the Housing Act may still be eligible for support under section 17 of the Children’s Act if they have a family and dependent children.</p>
<b>Disruption</b>	<p>There will be housing considerations in local disruption activity. Accommodation and support (for example through a reception centres) should be planned into any operations, with thought also given to longer-term accommodation options if victims choose not to enter the NRM.</p> <p>Housing provision may also be an important consideration in cases involving cuckooing, or in other cases (such as child criminal exploitation) where a victim may need to be rehoused in order to disrupt the exploitation and ensure their safety.</p>
<b>Prevention</b>	<p>Stable accommodation is an important factor in preventing the risk of re-trafficking. Housing and homeless services can also help promote awareness of trafficking risks with the communities they are working with.</p>



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This section (which is extracted from the LGA document ‘[Supporting modern slavery victims: guidance and good practice for council homelessness services](#)’) is intended to help raise awareness and understanding of modern slavery and councils’ homelessness/housing obligations, so that lack of awareness is not a barrier to victims receiving support.

## Framing the overall approach

There is lots of helpful guidance available setting out the overarching principles that should govern how organisations work with victims of modern slavery.

Chapter one of the [Human Trafficking Foundation’s survivor and trafficking care standards](#) sets out the following key principles (these are currently being updated):

- accessibility and non-discrimination
- human rights based approach
- holistic and victim-centred
- empowering
- freedom of thought, religion and belief
- multi-agency approach
- professional boundaries
- safe working approach
- trauma-informed approach.



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The [public health framework for modern slavery](#) also sets out principles for how services should be delivered:

- empowerment
- trauma-informed practice
- peer-led support
- tailored and person-centred support across the recovery journey
- culturally competent.

These are considered further below.

In designing their response for adult victims of modern slavery and human trafficking, councils should seek to embed the following core principles and features into their approaches.

## A trauma-informed approach

Working sensitively with all victims should be central to how councils and professionals respond. The [‘Trauma-informed code of conduct for all professionals working with survivors’](#), produced by the Helen Bamber Foundation, sets out guidance for how interactions with victims should be handled. The [Human Trafficking Foundation’s survivor care standards](#) also set out comprehensive guidance on providing support in an effective, person-centred way.



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All teams working with victims will need to consider that being a victim of exploitation or modern slavery is a deeply distressing and traumatic experience which has lasting effects, and ensure that their work with potential victims, from the first contact and risk assessment, takes account of the impact that this might be having. Working to put potential victims at ease through a supportive attitude and body language, developing trusted relationships with them and giving them the space to reflect on and make decisions, will all help to support the victim's interaction with statutory authorities. It should be recognised that many victims of modern slavery may be suspicious of interacting with statutory and other authorities.

### Working sensitively with victims

Being a victim of exploitation or modern slavery can be a deeply distressing or traumatic experience, which can have lasting effects. Councils should make sure that their work with potential victims – right from the first contact and risk assessment – takes account of potential trauma and the impact that this might be having.

Councils can do this by:

- Working to put potential victims at ease, with a supportive attitude and body language.
- Making sure that the physical environment and immediate location is safe, and attending to immediate physical needs including pain, hunger, and sleep deprivation.
- Providing reassurance about confidentiality, and making sure that potential victims understand that information cannot be shared without their informed consent, unless there is an immediate safeguarding risk.



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- Ensuring and checking that potential victims understand the process at every stage. This includes empowering potential victims by helping them to understand the support that they might be able to access, and highlighting where they have choice and agency.
- Ensuring that potential victims do not have to repeat their story multiple times – recounting the details of their exploitation can be a traumatising experience. Councils should ensure that victims are only required to tell their story once, and that the modern slavery coordinator is in a position to share information with other partners where needed.
- Building a trusted relationship – potential victims of modern slavery might not trust authorities or might not self-identify as a victim of exploitation. As a result, it can take time for them to build the confidence to disclose their story and needs. It is therefore important that councils can provide continuity of support, including by assigning an individual, named single point of contact who is responsible for coordinating multi-agency case work for a given victim.

## Person-centred approach

Councils should aim to deliver a person-centred approach in which the response to individual victims of modern slavery is tailored to their specific needs and works with them collaboratively.



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## Cultural competency and sensitivity

Many adult victims of modern slavery may be non-UK nationals and/or from a black and minority ethnic background. Cultural sensitivity and understanding, and the removal of unconscious bias, are therefore critical. The BME Anti-Slavery Network (BASNET) has recommended that all council practitioners working on this issue receive annual training on cultural intelligence, equality, diversity and inclusion. Research in Practice have produced [a framework for considering levels of cultural competence within relevant teams and organisations, and actions to advance this.](#)

## Accessible

Services and support should be accessible to all victims of modern slavery, taking into account the diverse needs that they may have. Information will need to be provided in a way that victims can understand: they may not speak English or may have other needs that impact their understanding. In particular, councils should consider how interpretation services can be provided safely (being mindful of previous cases where people providing interpretation services have been involved in trafficking and slavery themselves).

## Empowering

Responses to victims of modern slavery should be empowering and rights based, with the Human Trafficking Foundation noting that supporting individuals to regain trust in their ability to control their own lives is a crucial step towards reducing vulnerability and



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further exploitation. Supporting individuals to make their own choices, and providing support in a personalised way that recognises their strengths, can help to promote empowerment.

One aspect of empowerment is informed consent. While there is a legal expectation that children are protected from physical or psychological damage, adults with mental capacity have a right to make their own choices, take risks, be free from coercion, and make decisions about their own safeguarding and other plans. Reflecting this, under current Home Office first responder guidance a referral cannot be made to the NRM unless the adult gives informed consent to the referral, however a duty to notify referral must be made.

Section 2.2.1 of the [survivor and trafficking care standards](#) defines informed consent as follows:

‘Informed consent means that the person concerned must be given all the information in terms of why an organisation or individual is concerned about them, an explanation of support available to them and an understanding as to what accepting this support would mean. This should include exploring the benefits and risks as well as the likelihood of both of these. In addition, there should be a discussion as to any practical alternatives so that individuals are able to make an informed choice.’



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Victims' explicit and informed consent should therefore be a guiding principle in working with adult victims of modern slavery, most obviously in relation (although not limited) to deciding whether to enter the NRM. However, there have been examples of agencies encountering victims of modern slavery who have previously been referred to the NRM but were either unaware of this or did not know what the process had entailed, suggesting that their decision and subsequent experience could not have been an informed one. Allowing time to build understanding and secure informed consent is a vital part of working with victims, and one that councils need to reflect when developing their pathways and approaches.

Victims should understand:

- what the NRM is
- what support is available through the NRM
- what the possible outcomes from referral are
- where their details will be sent and the approach to privacy of information
- that they can choose to enter or leave NRM support at any time.

Those working with survivors should ensure and check that potential victims understand the process at every stage, empowering individuals to understand the support that they might be able to access and highlighting where they have choice and agency.

Children with active referrals will need to provide consent for their NRM referral upon turning 18, so an approach will need to be considered to gain informed consent.



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The statutory guidance on the Modern Slavery Act states that it should be assumed that individuals have capacity to make a decision about whether or not to consent to enter the NRM. However, where there are doubts about capacity to make a decision, a mental capacity assessment can be undertaken.

Adults without mental capacity have legal safeguards under the Mental Capacity Act 2005 and in some circumstances must have the representation of an advocate or representative to act in their best interests (sections 2-4 of the Act). An independent advocate represents and supports an adult where the adult has ‘substantial difficulty’ in being involved in a safeguarding enquiry or review, and where there is no other suitable person to represent and support them.

If a person is deemed incapable of giving informed consent under the Mental Capacity Act 2005, a guardian should be appointed to help him or her make decisions. The person, however, should still be placed at the centre of the decision-making process. In such cases, the independent advocate would also support a victim with a decision regarding an NRM referral. Before a decision is taken in the best interests of an individual, it would be vital to consult with any other agencies involved in the care and support of the individual.

## Survivor voice and input

Councils should ensure that they are working with victims with lived experience to design policies, assessments, procedures and evaluation that respond to cases of trafficking and slavery, and are working with survivors throughout the delivery of services.



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## Partnership working and multi-agency collaboration

An effective local response to slavery and trafficking requires good multi-agency collaboration, particularly for adult victims where support may also be provided through MSVCC providers, anti-trafficking organisations or other charities, as well as through support funded by police and crime commissioners.

In recognition of this, some areas have developed multi-agency risk assessment conference (MARAC) approaches to support the response when a victim is identified locally: this is embedded in the [Welsh Government's modern slavery safeguarding pathway](#) and the [Human Trafficking Foundation's local authority toolkit and adult referral pathway](#). Similar approaches have been adopted by English councils. One example is the [West Midlands Anti-Slavery Network pathway](#), while [Westminster City Council's multi-agency case conference approach](#) for victims identified through homelessness teams is outlined below.



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### Westminster/The Passage multi-agency case conference

The aim of the multi-agency case conference (MACC) approach is to provide proactive, preventative relief that helps to prevent re-trafficking and re-exploitation. When a potential victim is identified by The Passage (a homelessness support organisation) or within Westminster, a MACC is arranged within 48 hours, bringing together the following partners:

- The Passage
- Westminster Council adult social care team
- Westminster Council rough sleeping team
- an immigration advisor (if appropriate)
- an NHS nurse (homeless team) (if appropriate)
- police (if appropriate)
- pre-NRM safe house case worker (if appropriate)
- any other key workers from external agencies providing support to the potential victim.



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The aim of the MACC is to agree an action plan for the potential victim, setting out the steps different partners will take, and it may cover the following issues:

- a risk and vulnerability assessment and wider needs assessment
- the health and mental health of the potential victim
- support provided by The Passage
- emergency accommodation and who is providing it
- capacity to consent
- referral into the NRM or duty to notify, and the lead first responder for this
- any legal issues (immigration status, involvement in criminality)
- whether the victim has children and what support is required.

Whether a MARAC approach has been implemented or not, partnership working should be underpinned by timely information sharing about risks and concerns and collaborative working to protect victims. It is important to recognise that this can also include working with other councils, for example when the risks of remaining in a particular area may necessitate a victim seeking support in a different council area.



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## Working with the local VCS

Establishing links with partners, including local statutory and voluntary services, can help ensure a stronger response for victims of modern slavery in local areas, as well as more coordinated work on modern slavery overall.

As a minimum, it will be helpful for councils to understand which VCS partners are working with victims of modern slavery in their areas: this may be as part of the MSVCC (for example, local safehouses or outreach support), but it may also involve work by anti-slavery charities outside the MSVCC support framework. Clearly, these organisations will come into contact with victims of modern slavery, often before an NRM referral has been considered, and it will be helpful for them to understand how to link into the council in order for victims to be referred for any support to which they are entitled.

Equally, anti-slavery charities will be able to assist councils with specialist expertise and advice, and in developing a better understanding of the needs of modern slavery victims. Knowing the map of anti-slavery charities operating in the local area, and having established links to them, will help to build and strengthen relationships and should facilitate a swifter and smoother response when dealing with victims, particularly at the point of identification or when an individual may be approaching exiting NRM accommodation.



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Homelessness/housing teams can work jointly with their modern slavery coordinator or lead to seek to develop these relationships if they do not already exist, and to agree how they will be best managed. However, feedback from VCS organisations is that it is helpful to build direct relationships with homelessness/housing teams, so that contact can be made quickly to discuss individual cases and needs.

Although information about some aspects of the MSVCC (for example the location of safehouses) is understandably sensitive, The Salvation Army are keen to develop closer links between their sub-contractors and councils. To find out about local MSVCC services, councils can contact The Salvation Army via [mst@salvationarmy.org.uk](mailto:mst@salvationarmy.org.uk)

Homelessness/housing teams are already likely to have relationships with local homelessness charities; as set out above, these groups should be included within local awareness raising efforts, with information shared through local homelessness forums.

## Building time into victim support pathways

All of the above approaches mean that councils (and their partners) will need to build in sufficient time to their pathways to work with victims in an appropriate way, not least to build trust and rapport that makes it less likely victims will disconnect with services. It is unlikely that in many cases a council (or any other first responder) could, within a few days, identify a victim, refer them into the NRM and secure a reasonable grounds decision while taking a trauma-informed approach that works sensitively with victims.



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Councils and partners will therefore need to consider how victims' needs can be supported from the point at which they first come into contact with the authority, but before/until they are able to access NRM or other accommodation (assuming they consent to an NRM referral, which many will not). This period has proved to be a consistent pinch point for councils in responding to modern slavery, and is therefore worth considering and planning for.

## Streamlining approaches to reduce stress and trauma

While recognising that initial work with victims requires time, councils should nevertheless think about how the management of their processes can reduce, or add to, the stresses placed on victims of modern slavery interacting with statutory and other services.

The speed and way in which councils reach decisions on housing support for potential victims of modern slavery is also important. While councils strive to make all decisions on housing support as swiftly as possible, a quick decision is particularly important in relation to those who have experienced modern slavery. Securing accommodation is an important step in reducing the risk of re-trafficking and beginning the process of recovery.

One example is in relation to the local connection criteria, which councils have discretion to apply. It will always be helpful for a council to begin the decision making as soon as possible, to enable clarity for the individual at the earliest opportunity.



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Equally, recounting details of their exploitation can be a traumatising experience for victims. Councils should ensure that information can be shared within teams so that individuals are only required to tell their story once, rather than to different staff members, as well as considering the scope for receiving information from partner organisations rather than from victims directly. Taking into account and obtaining information (with consent) from statutory and non-statutory organisations will enable councils to build up a full picture of a survivor's situation and needs, which may not otherwise be disclosed until a relationship of trust has been built with the council.

Schemes such as [Sheffield City Council's trusted assessor scheme](#) for housing applications are a good example of how councils have developed bespoke approaches that simplify processes for survivors and victims.

Similarly, where an individual already has a conclusive grounds decision, or even a reasonable grounds decision with a conclusive grounds decision pending, council teams should consider whether it is necessary for a victim to provide the same information to the council to be recognised as a victim of modern slavery, when the decision of the relevant competent authority could simply be recognised.

Once in receipt of all the information required, the speed and way in which councils make decisions can also reduce trauma for victims, with swifter decisions and clarity reducing stress and uncertainty. Delays, stress and uncertainty can lead to a deterioration in mental health, disconnection with services and an increased risk of individuals falling back into exploitation. Where councils have been able to develop consistent policies and approaches to victims of modern slavery that are not focused



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on individual needs this can clearly support swifter decision making, although not all councils may be resourced to take this type of approach.

## Accommodation requirements

A further issue for service leaders to consider, ahead of the point of need, is what accommodation can be made available to victims when they are identified and a duty is recognised.

This can be a challenging issue for many councils, with significant shortages of housing stock or suitable temporary accommodation impacting the availability of suitable accommodation, and limitations on the type of accommodation that housing allowances will support. However, this emphasises why it is important that councils have undertaken some planning regarding what they might draw on, and how they might mitigate any shortcomings in what is available.

The individual circumstances of the victim will impact the type of provision that is required and appropriate. The accommodation needs of a young person, potentially still living with their family, who needs to be distanced from a situation of exploitation, are significantly different to a single person who may already have moved away from where their exploitation took place. Wherever possible, any provision made should try to reflect and respond to the specific needs of an individual.



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Considerations should include:

- What options there are for housing victims locally, or outside of the area if local accommodation is not safe for the victim given the circumstances of their exploitation? If none are available, how can accommodation be arranged elsewhere – can this be agreed with a nearby or other council?
- What type of accommodation is available to the council? Is it shared accommodation and if so is it mixed or single sex? For some victims mixed accommodation will not be suitable.
- What additional support packs can be provided to help meet basic needs at the point of identification, wherever victims are housed, such as clothes, toiletries, food?
- Is there an external partner – whether an alternative council or a VCS organisation – that may be able to provide support with wraparound care and potentially accommodation?

Different areas have taken different approaches to try to meet needs at the point when a victim is initially identified, including:

- several areas have commissioned dedicated emergency accommodation to support victims of modern slavery while they consider whether to enter the NRM, sometimes this is funded by local police and crime commissioners
- the provision of support packs to victims
- local agreements to house victims in neighbouring boroughs while cases are considered



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- permitting teams to procure hotel accommodation for victims for an interim period
- working closely with local homeless charities to provide dedicated support for victims.

## Identification and referral

There are various points in a victim's experience where homelessness/housing teams may come into contact with them. This has typically been when a victim has been able to leave their situation of exploitation and is homeless but has not yet been referred into the NRM; however, contact may also be made at a point when an individual will shortly be or has already left NRM accommodation.

There is scope to strengthen partnership working between victim care contract (VCC) providers and councils to help smooth out the transition between local authority housing and VCC accommodation, and vice versa. Homelessness/housing teams should consider these two stages in particular, and think about the processes and provision that will be most important to supporting victims at these stages of their recovery.

As in previous sections of this guidance, when thinking about victims in the timeline of NRM support it is important to remember two points. Firstly, not all individuals will consent to enter the NRM, or will do so immediately after identification if they do choose to. Secondly, even with an NRM referral and positive reasonable grounds decision, there may still be an expectation that a victim will be housed by the local authority if they are eligible to be supported (although outreach support would still be available to victims accommodated by the council).



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## Identifying risks and needs

Effective needs and risk assessments are a core part of supporting victims, and of the referral process to the NRM. Both initial assessments and ongoing multi-agency assessments will help to ensure that potential victims are linked into the correct services, and that multi-agency provision is coordinated and available at the right time.

### Training and understanding

The homelessness code of guidance emphasises that homelessness decision makers should be alive to the possibility that applicants for assistance under part seven are victims of modern slavery and or are otherwise vulnerable, to help them meet their obligations.

Homelessness/housing teams should ensure that training is made available for their officers, focusing on specific issues relevant to homelessness and housing. Training could include face-to-face training, e-learning, assessment tools or checklists to help trained staff spot the signs of modern slavery and correctly refer them for appropriate support. As a minimum, it should cover:

- types of modern slavery
- the indicators of modern slavery, and how staff can spot the signs in a variety of situations including homelessness/housing scenarios
- the NRM and duty to notify



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- the council's approach to managing modern slavery and what to do when a possible victim is identified (including how referrals can be made internally and to the Single Competent Authority under the duty to notify) – see later section on internal collaboration
- the support available to victims, including the homelessness code of guidance sections on modern slavery
- local and national partners the council can work with to ensure appropriate support is provided to victims.

Training should also ensure staff have a clear understanding of the entitlement of victims to support.

## Initial needs and risk assessments

When an individual is identified as a victim of modern slavery, an initial urgent needs and risk assessment should be undertaken to understand what steps are needed to get potential victims out of immediate danger. Who does this will depend on an individual council's (and wider local area) referral pathway, and how the victim has first been identified. Homelessness/housing services should be clear on the steps to be taken in the event that a victim is identified within the service, as well as where a victim has been identified outside of the service but will need to be referred into it for consideration of housing need.



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The Human Trafficking Foundation identifies three immediate questions which this first assessment should cover based on the victim's immediate safety, as well as a series of follow up questions related to their basic needs:

- Is the potential victim still being or likely to be targeted by their trafficker?
  - Are they still in or near the location where they were exploited? Does their attacker have access to their location?
  - Do they need to be moved from their location as soon as possible?
  - Are there any child protection risks?
- Are they housed?
- Do they have income, food, and warm clothes?
- Are there any immediate risks to physical and mental health?

If immediate risks are identified, including risks from staying in the area, then homelessness services should be prepared to try and identify emergency accommodation for any eligible potential victims, potentially out of area.

If immediate risks are identified and cannot be immediately met, then an expedited referral to the NRM can be considered. To increase chances of the referral being successful, it is important to write on the referral that it has been made in haste, that only the basic information needed to identify individuals as potential victims has been included, and that further information will be provided at a later stage. Failure to provide this further information could lead to a negative reasonable grounds decision being made.



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At this stage, the lead officer can also contact The Salvation Army and make them aware of the new potential victim. This will help them to prepare their services in the event that potential victims are referred into the NRM.

## In-depth needs and risk assessments

If the potential victim is not considered to be at immediate risk, then a more in-depth needs and risk assessment should be undertaken.

This assessment should consider the following in relation to housing:

- Does the potential victim have somewhere to stay until a referral can be made into the NRM and they receive a reasonable grounds decision?
- Are they eligible for assistance under the 1996 Housing Act?
- Are they likely to be considered priority need, and therefore potentially owed a duty to provide interim accommodation?
- If the person is not eligible, are there non-statutory options where they can be housed? Would The Salvation Army or a sub-contracted housing provider consider accommodating them before the reasonable grounds decision is made?
- Are they at risk of future homelessness due to any financial difficulties or debts? This might include debts which have been made in their name by their exploiter.



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There are also a series of wider issues that may be considered as part of this process:

- Are there any needs or risks relating to safety or health, for example risk from exploiters, physical or mental health issues, risk of self-harm or suicide, substance misuse issues and treatment plans that need to be shared by drug and alcohol teams, risk of absconding from accommodation or risk of re-exploitation?
- What support needs to be in place in interim accommodation to mitigate these risks?
- Does the potential victim need any professional legal advice to support them with welfare benefit claims, immigration or asylum issues, criminal law advice, housing advice, or accessing victim compensation? Are they entitled to free advice for anything covered by legal aid?
- Do potential victims need to be referred into asylum? Councils should note that this might not always be appropriate, and that councils cannot legally provide immigration and asylum advice. Instead, referrals should be made to immigration advisers or lawyers who are registered with the Office of the Immigration Services Commissioner.

## Intersection with the NRM referral process

After an individual's case has been assessed for indicators of modern slavery and any immediate safeguarding risks dealt with, a referral into the NRM should be discussed with the individual. Again, the internal referral pathway should make clear who is responsible for discussing this with a victim and taking it forward in accordance with their wishes. Responsibility may rest with a frontline service team such as homelessness/housing, or it may sit with a modern slavery coordinator or safeguarding team.



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The potential victim's explicit, informed consent is needed for an NRM referral. This means that they should understand:

- what the NRM is
- what support is available through the NRM
- what the possible outcomes from referral are
- where their details will be sent
- that they can choose to enter or leave NRM support at any time.

The West Midlands Anti-Slavery Network has produced a [guide to the NRM for first responders to share with victims](#), which is available in a number of different languages.

Where there are concerns that individuals might not have the capacity to consent, appropriate safeguarding procedures should be followed, with decisions made in the best interests of the potential victim.

It may be helpful for non-British nationals to have legal advice about entering the NRM; while this is not currently within the scope of legal aid, it may be possible to access this as part of advice on claiming asylum, or from a law project or pro-bono offer.

Where victims do consent, an NRM referral form should be completed. Councils should ensure that all staff making referrals have been trained in how to make a good quality referral into the NRM. There are many resources available to provide guidance on this, including on the [LGA website](#), [guidance on NRM referrals from the Single Competent Authority](#). It is crucial that referrals include enough information as is useful to identify people as potential victims. Even where responsibility for submitting an NRM referral



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rests elsewhere, homelessness/housing services already working with potential victims should consider providing input into the form as part of local multi-agency risk assessment or other processes.

Some victims of modern slavery will not be willing to be referred into the NRM. For example, they might not consider themselves to have been exploited, may distrust authorities, or may not consider a referral to be in their interest. The council is still subject to a statutory duty to notify the Home Office that they encountered a potential victim.

In these circumstances, councils can still consider:

- whether they owe potential victims homelessness duties
- whether they can make a referral to a non-statutory accommodation provider or safehouse
- whether they have legal powers to accommodate victims in order to protect them from further re-exploitation, if that is possible.

The council and its partners should ensure that there are opportunities for potential victims to consent to referrals later, as people might change their mind over time and as they build trust in their support workers. Evidence from ‘Project TILI’, run by Crisis, shows that where people were not referred into the NRM, their housing situation was significantly worse than people who had agreed to enter the NRM. This is because the organisations that supported them did not necessarily have the specialist knowledge and resources of organisations within the NRM.



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## Supporting victims

There are two main pieces of legislation outlining the support which councils may provide to adult victims of modern slavery: the Housing Act 1996 and the Care Act 2014. As outlined in section six and elsewhere in this document, this can be a challenging area for councils that do not have access to, or a budget to commission, emergency accommodation options for victims. Again, as noted in section six, proactive planning to consider how councils will address difficult cases involving victims with no recourse to public funds, or who otherwise do not fall within the council's responsibility, is recommended to improve councils' responses when victims present.

## Emergency/temporary accommodation

As highlighted earlier, the provision of accommodation after a victim has been identified but prior to them moving into NRM accommodation (if that is assessed as necessary as part of a needs based assessment) has been a consistent challenge. The Government had previously committed to 'places of safety' provision to cover this period but this is not yet live, and in any case may be restricted to individuals rescued from exploitation. In practice, it may take several days before a reasonable grounds decision is received and an individual can enter the NRM, and during this time they may be unhoused and in need of emergency accommodation.

Local housing authorities should use this time to make enquiries into a potential victim's homelessness or risk of homelessness as part of the needs assessment process set out above, and make placements into emergency accommodation where possible. Councils



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and other first responders can also make an immediate referral for pre-reasonable grounds MSVCC support in cases where an individual is destitute or at risk of becoming destitute, is not eligible for council support, or where the available council support is not suitable.

Homelessness services should consider the following principles:

- In all cases, councils should ensure they are following their safeguarding procedures. If there is a risk of serious and immediate harm to victims, they should be offered a safe place to stay.
- Decisions on whether potential victims are eligible for statutory homelessness support and interim accommodation will need to be made quickly, to reduce the risk of re-exploitation as much as possible.
- Potential victims of modern slavery may well be in priority need due to vulnerability as a result of exploitation. They are potentially unlikely to have the documentation needed to prove eligibility at short notice.
- Homelessness services participating in multi-agency case conferences can help to speed up decision-making, as key information can be shared in existing forums and with the right decision-makers.
- Regional multi-agency case conferences, which include several local housing authorities, can help to coordinate provision and increase the pool of available emergency housing.
- This can also be useful in cases where victims need to be housed outside their local area for safety reasons, as it means that they can access accommodation in other council areas.



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- However, councils should carefully consider whether it is appropriate to move potential victims out of area, for example if they are receiving specialist services or support in a particular area. If accommodation is only available out of area, then councils should arrange to share key information with key services in the new area to ensure continuity and reduce the need for victims to retell their story.
- Emergency accommodation should be assessed for suitability and safety. For example, shared accommodation might not always be suitable for potential victims.
- Where potential victims do not have recourse to public funds but want to be referred into the NRM, they could potentially be accommodated by The Salvation Army or other charity. As the NRM housing provider, The Salvation Army is not obliged to accommodate potential victims before they receive a reasonable grounds decision. However, they might agree to provide this accommodation if potential victims are in urgent need or destitute.

Councils may also need to go through this process if an individual receives a negative reasonable grounds decision, including considering:

- whether they owe individuals assistance under the Housing Act
- whether they can make a referral to a non-statutory accommodation provider
- whether housing assistance is owed under child protection duties.



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## Housing and support during the NRM process

If potential victims receive a positive reasonable grounds decision, they are entitled to at least 45 days of MSVCC support during a ‘recovery and reflection’ period. This support might include financial support and access to a dedicated support worker. This ensures victims receive the tailored support necessary for them to begin rebuilding their lives, engage with the criminal justice system, and transition back into the community following their modern slavery experience. It can also include access to safehouse accommodation where necessary; however, the homelessness code of guidance states that:

‘Where a potential victim is already in suitable accommodation, such as accommodation secured by the local authority or asylum accommodation, and there is no risk to them in remaining at their current location, they will usually continue to remain in that accommodation unless a [MSVCC] needs-based assessment reveals a specific need for [MSVCC] accommodation.’

Councils should not assume that individuals referred into the NRM will always enter MSVCC accommodation, but instead work on the basis that if the council owes a victim a duty, the usual expectation will be that the council should continue to house that individual while they are in the NRM. The section below outlines considerations for councils in relation to long-term housing support for victims.

Where potential victims do enter victim care contract accommodation, there are a number of issues that homelessness/housing teams (along with other council services and multi-agency partners) may need to clarify regarding support for the victim and their



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long-term plans on coming out of the NRM. One concern councils have often raised is that when individuals enter the NRM, they receive no further updates on their progress or needs. With an increasing focus on supporting individuals out of the NRM and into mainstream services, and strengthening relationships between MSVCC organisations and statutory services, it is hoped that better information sharing will develop.

Homelessness/housing teams from the council or area where a victim was referred could consider the following at an early stage:

- If potential victims already have accommodation in place but it has been agreed they will enter NRM accommodation, councils should liaise with the DWP and ensure that benefits/rent continue to be paid during the individual's stay in NRM accommodation, so the individual's tenancy is not disrupted.
- What communication, if any, needs to take place with the accommodation provider? Will someone within the council maintain communication with the potential victim's safe house, so that they are aware of the victim's NRM exit plan and housing needs?
- If the potential victim was moved to a different local area, which council will handle their case once they leave NRM accommodation? Victims may choose to return to their old place of residence if they have links with that region – housing services and other local agencies should make sure they consider what provisions they can make. The council where the potential victim was first identified should ensure that they carry out the necessary local connection assessments as soon as possible, so that there is clarity about the victim's entitlement.



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Wider council services and multi-agency arrangements could also consider the following issues, in conjunction with the MSVCC contractors. MARAC style arrangements to support victims will help facilitate joined-up discussions about a support plan for a victim:

- What multi-agency support will need to be in place for potential victims who are either staying in the council area, or likely to return after leaving NRM accommodation?
  - This should consider safety, healthcare and substance misuse treatment, legal and immigration advice, potential employment, practical, cultural and psychological needs and any dependants (including children).
  - It should also consider the likelihood of re-trafficking, as this is a significant risk for many victims of slavery after they escape exploitation.
  - What flexibilities can be put in place to enable victims to access the necessary mental health or substance misuse support?
  - If a potential victim does not meet the criteria for support, could referrals be made to specialist charities?
- How quickly can plans be formulated and delivered?
  - Assessment processes around housing and other services may need to be fast-tracked, as there is a high risk of re-exploitation once people leave victim care contract accommodation. Local services should work with the VCC provider to discuss when services can be made available and how these will work in conjunction with ongoing VCC support.



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## Longer-term housing solutions and support

Having access to safe and stable accommodation is an important part of the recovery process for victims, and vital for reducing the risk of re-exploitation. Council homelessness/housing services have a key role in facilitating this, for example through local schemes to help victims access the private rented sector or commissioned supported housing.

Depending on the circumstances of an individual case, councils may need to consider this before, during or after a victim is supported through the VCC.

For victims in MSVCC accommodation, after a positive conclusive grounds decision they will receive a minimum of 45 days of further support within the VCC. A recovery needs assessment will be undertaken to identify an individual's tailored support needs. Part of this process will be to identify how to transition victims into longer-term accommodation and support in the community, where appropriate, and should involve close working between VCC organisations, councils and other organisations.

At this stage, if they haven't done so already (for example because the case is new to their area), councils will need to consider whether a victim is owed any or all of the main homelessness duty, the prevention duty, or the duty to provide interim accommodation, and respond accordingly.



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If potential victims receive a negative conclusive grounds decision, they will receive nine working days of move-on support. This can leave individuals with a very short amount of time to source alternative accommodation and support. Again, close engagement between the MSVCC provider, relevant council and other partners is advised.

Council homelessness teams, in particular, should consider the following:

- If potential victims are foreign nationals who have received a positive conclusive grounds decision, and have been granted leave to remain with recourse to public funds, then they are likely to have recourse to housing assistance under the Housing Act.
- If the council can't provide assistance, they could support individuals to take immigration advice. They should also consider whether victims are able to access asylum accommodation.
- If only shared housing is available, councils should ensure that this is suitable.
- Victims might have developed a connection to the area that is local to their safehouse accommodation – can councils apply flexibilities around local connection?

Beyond housing, NRM exit planning between the VCC provider, council and other partners should also consider ongoing support to the victim around a range of different aspects of their support plan, such as benefits, immigration, healthcare and social care support. This could include making provisions for the following:

- legal advice on immigration, including applying for right to remain if needed
- registering with a GP



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- exploring access to education, volunteering and employment
- accessing classes to improve English language skills
- obtaining a national insurance number
- accessing benefits
- accessing non-statutory support, including from specialist VCS organisations.

In all cases, if people do not meet the criteria for statutory support, councils should consider referrals to the non-statutory sector.

## Victims with no recourse to public funds

It can be challenging to support victims with no recourse to public funds, which can increase the chances of their re-exploitation, although some councils have used rough sleeping funding to help support this group ([for more information on no recourse to public funds, see the adult services section](#)).

## Cuckooing

Cuckooing is a way in which vulnerable people may be exploited through their housing situation. [For more information on cuckooing, please visit page 134.](#)

## External awareness raising

Councils should also consider how they can raise awareness of the risks of exploitation amongst local communities, especially amongst the homeless and those working with them. People working with the homeless community should be alert to perpetrators targeting homeless communities – including people sleeping rough, in



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shelters, in day centres or at soup kitchens. This could involve people being offered work, a place to stay, or access to drugs or alcohol. In some cases, perpetrators have been known to pose as homeless people.

Ensuring a broad level of awareness can enable a much wider range of people to spot the signs of modern slavery and report potential cases, as well as enabling homeless people to keep themselves safe from exploiters, or to recognise their own experiences as potential victims of modern slavery and seek support.

Raising awareness might include:

- displaying information in various languages in council offices and supported housing schemes
- hosting social media campaigns
- running an awareness-raising event
- displaying information on the signs of exploitation in tenants' and residents' associations
- including information in council newsletters
- hosting sessions at local residents' forums.

Councils could also partner with the police and other partners to host information sessions at accommodation services or day centres. A 2017 report commissioned by the Independent Anti-Slavery Commissioner highlights one example of an organisation hosting a police session at their day centre, which resulted in several people coming forward to talk about their experiences of being approached by traffickers.



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## Checklist for homelessness/housing service leads

### Have you:

- Identified your council's modern slavery coordinator or lead team and made links with them to discuss the issue?
- Clarified your council's internal referral pathway for modern slavery and what you should do when homelessness/housing identify a suspected victim?
- Reviewed your team's policies and procedures (for assessment, placement and so on) to ensure they take into account the specific needs of victims of modern slavery, including potential local connection issues?
- Assessed what emergency accommodation is available locally to draw on when a victim is identified/pre-NRM?
- Reviewed the additional support/mitigations that might be required where suitable accommodation isn't available?
- Considered the scope for reciprocal placement arrangements with other councils where local housing options are unsuitable or inappropriate?
- Agreed how suspected victims of modern slavery can be referred into homelessness/housing services if identified by another service or partner?



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- Established direct links with local anti-slavery and homelessness organisations?
- Considered establishing or taking part in a MARAC-style approach to individual cases?
- Ensured that homelessness/housing staff receive training on:
  - types of modern slavery
  - indicators and how to spot the signs
  - specific needs and challenges of survivors of modern slavery
  - the NRM process and victim support
  - the interaction between the VCC and local support
  - potential entitlement for victims to local authority housing under relevant housing legislation
  - an overview of other council support a victim may be entitled to
  - the council's internal processes for responding to cases of modern slavery, including referral pathways
  - any local MARAC style/multi-agency processes for dealing with suspected cases
  - key local partners and contacts.



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## Further resources

[Homelessness code of guidance for local authorities](#)

Crisis: [‘Project TILI’ resources and reports](#)

[St Mungo’s ‘Routes home’ resources](#)

LGA: [‘Supporting modern slavery victims: guidance and good practice for council homelessness services’](#)

Home Office: [‘Modern slavery statutory guidance for England and Wales’](#)

Home Office: [national referral mechanism guidance](#)

Home Office: [first responder training \(policingslavery.co.uk\)](#)

Human Trafficking Foundation (HTF): [map of survivor support services](#)

HTF: [London directory of survivor support services](#)

West Midlands Anti-Slavery Network: [adult modern slavery pathway partnership template](#)

West Midlands Anti-Slavery Network: [NRM explanatory document](#)



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# 10. Community safety

Community safety teams are often, although not exclusively, responsible for leading and coordinating a council's modern slavery activity, and there are a number of reasons why this is a logical approach. Community safety teams will already be leading councils' work to prevent crime and disorder in their areas (a requirement of the Crime and Disorder Act 1998, as one of the statutory partners in a community safety partnership), and modern slavery considerations should be a core part of this business-as-usual activity.

This broad remit enables them to take a wider focus extending across prevention/ disruption activity and victim support, in contrast to other services which are likely to be more narrowly focused on one particular aspect of modern slavery work. There are also clear parallels and overlaps with other areas of community safety work such as domestic abuse, county lines and working with people with complex needs, and scope to join this up with modern slavery work.

Community safety teams may deliver different types of modern slavery work. However, the extent to which teams can support all of these activities will depend on the capacity and wider resources available to each team, which can vary significantly across councils. Smaller community safety teams can reinforce their capacity by working collaboratively with the police, adult safeguarding, modern slavery partnerships and child exploitation teams, and could consider linking together with other councils to create a shared resource or lead for the issue.



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## Providing a source of expertise and/or training

Some community safety teams or individual officers have focused on providing a source of modern slavery expertise and knowledge for the rest of the team and council to draw on, given the complexities of modern slavery generally and the framework for supporting victims. As set out earlier in this document, identifying a specific officer(s) with in-depth knowledge of modern slavery, the NRM process and key issues around victim support (such as the intersection between the NRM, council support and rules around recourse to public funds) can help in supporting other teams – including through training, as well as in providing a more informed response to individual victims, particularly if community safety teams are involved in dedicated victim support services.

Smaller community safety services which do not have the capacity to provide training directly may be able to link council teams up with other local services that can offer this.



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## Stevenage Borough Council: support for survivors

Survivors Against Domestic Abuse (SADA) is a holistic approach to working alongside survivors of domestic abuse, with support also extending to families. The service offers crisis intervention, together with client-led support and signposting to other agencies suited to the individual and their own situation. Once someone has come through the service they gain access to the SADA domestic abuse forum, which is run by survivors who want to make a difference and continue the support system. A weekly drop-in is run virtually which provides extra support to victims, survivors and their families. The SADA service supports survivors from all areas in Hertfordshire.

In 2018, Stevenage Borough Council established a modern slavery team, aiming to take a similar approach to victims of modern slavery. The SADA modern slavery service is part of the wider SADA team, which in turn sits within Stevenage's community safety team, and is intended to provide specialist expertise on modern slavery across the council. The council is also contracted to provide modern slavery services on behalf of North Hertfordshire District Council



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The modern slavery service is responsible for providing one-to-one support for victims, families and children experiencing modern slavery, including signposting to agencies and support services and helping victims to access services. The service assists with initial support when victims are identified, with packs of food and toiletries delivered to police stations or hotels to provide basic assistance. Internal referral pathways have been developed to show how council staff can report cases and concerns, and the service is responsible for making NRM referrals on behalf of the two councils. In 2021-22 the service made 14 referrals. Outcomes of cases involve victims being supported into temporary accommodation, into the NRM or to return home.

A major focus is staff training and general awareness raising, both within the council and externally through media work. Training has targeted key staff groups such as housing staff, the county children's services team and partner organisations.

## Joining up relevant partnership working

Community safety teams will be closely plugged into the work of the community safety partnership, as well as the violence reduction unit if there is one in the area, and often to local safeguarding boards. Community safety partnerships should have a good level of understanding around trauma-informed approaches to tackling serious violence and contextual safeguarding, through their experience of working on issues around criminal exploitation, domestic abuse and reoffending. In an increasingly complex landscape of partnership boards and overlapping duties (for example, duties to collaborate to tackle



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specific crime types or provide support to victims of crime), community safety teams can play a role in ensuring these are as cohesive as possible and linked up with anti-slavery partnerships, as well as ensuring modern slavery is reflected in the local strategic planning and data analysis undertaken by these groups.

## Intelligence sharing and operational tasking

At a more operational level, community safety teams will be linked into local structures for sharing intelligence, targeting activity and conducting joint operations with partners including trading standards, licensing, environmental health and private sector housing, the fire and rescue service and police. This will also involve national partners such as the Gangmasters and Labour Abuse Authority, HMRC and Immigration Enforcement (although involving Immigration Enforcement in operations can impact on the response from potential victims). In areas that have a violence reduction unit, partners will have developed a problem profile or strategic needs assessment and response strategy, which will also be a useful source of intelligence-sharing.

## Linking up with anti-social behaviour activity

Community safety teams, working with partners dealing with noise and nuisance complaints, support councils' work to tackle anti-social behaviour, some of which may be linked to modern slavery – for example in over-crowded housing or where there is evidence of possible cuckooing (when criminals use violence and abuse to target the homes of vulnerable people and use them as bases for illegal activity).

For [more information on cuckooing](#), please visit page 134.



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Community safety teams can develop processes to collect relevant intelligence and complaints and ensure it is reviewed for patterns of anti-social behaviour and indicators of modern slavery, with subsequent disruption activity coordinated across partners. Disruption activities could include community protection notices for people, businesses or organisations committing types of anti-social behaviour, or closure orders to quickly close premises being used (or likely to be used) to commit nuisance or disorder.

## Planning disruption activity

Linked to the above, community safety teams are well placed to lead and strengthen cross-council and cross-partner disruption work. This should include:

- cross-council planning meetings ahead of planned enforcement action
- working with partners to identify all available information
- identifying links with other premises
- considering all available enforcement routes, actions and outcomes
- considering and preparing the approach to victims (including reception centres, interpreters, support resources, agreeing the approach to victims [prioritising safeguarding over enforcement], VCS involvement and so on).

Community safety teams can draw on a [guide to the national enforcement powers available to disrupt modern slavery](#) developed by the Hertfordshire Modern Slavery Partnership and the Home Office to support council and wider multi-agency disruption work.



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## Victim response and support

One of the challenges for councils is that modern slavery cases can be extremely complex, and the needs of victims may not fit neatly into existing services or eligibility criteria. In some councils, community safety teams have taken the lead in establishing dedicated teams to deal with cases of modern slavery, or commissioning accommodation and support services for victims of modern slavery – often in partnership with local charities and/or funded by the police and crime commissioner. Where there are resources to support this, these teams and services have proved extremely effective in providing expert responses to victims and taking pressure off services such as housing and social care.

## Prevention

Services working directly with victims as part of their wider work, such as housing or safeguarding teams, are unlikely to be able to extend their work into broader prevention activity not directly related to their remits. Community safety teams are better placed to help develop a public health approach to modern slavery by proactively working with council colleagues, including communications teams, on modern slavery prevention work. Crime profiles and wider data and intelligence analysis can be used to identify local at-risk groups and develop targeted communications that share information about employment rights and how to raise concerns.



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### Modern slavery prevention

Unseen, the charity which runs the national modern slavery and exploitation helpline, was funded by the government's Modern Slavery Prevention Fund to explore approaches to prevention. Using data from its helpline and lived experience accounts, its [report on how to prevent modern slavery](#) analysed the different recruitment tactics used to lure victims into modern slavery – whether false promises or statements, job offers/advertisements, or via an intimate partner or marriage proposal; and subsequent methods of control by perpetrators. Data was analysed by victim nationality, age bracket and exploitation type.

Unseen conclude that 'prevention activities and resources should be focused on informing and supporting those at risk to prevent modern slavery and reduce the levels of re-trafficking...Support and information should be readily available and offered in a timely manner to those who leave exploitation and those who might still be in exploitative circumstances.'

In line with the public health approach to modern slavery, many of the actions required to target modern slavery prevention will sit at national level. For example, collaborative work with overseas governments to protect potential victims from being recruited in other countries, or online work to target fake adverts.



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However, there are a number of recommendations in the report which councils could consider how to implement locally:

- Increasing resources to educate and train young people on accessing work, awareness of their rights and entitlements, and how to spot manipulating behaviours. For vulnerable communities, including migrant communities, resources and training to understand rights and entitlements and where to go for assistance can be integral to people asserting their rights and reducing risks around exploitation.
- Safety and awareness resources, including the helpline number, should be available in public places like parks and train stations so people know to look out for those who might be targeting them.
- Strategies for prevention should look at housing regulations, renting laws and others to help reduce private homes being used as locations for exploitation.
- Training and awareness of people likely to attend private homes regularly should also be rolled out for reports to be made quickly – for example, training for housing officers, delivery drivers and door-to-door salespeople.

Alongside this, community engagement workers who are from the community can build relationships of trust to understand the trafficking picture, identify potential victims and deliver prevention responses.



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## Supporting the use of specific modern slavery disruption/prevention tools

Community safety and other council teams can also work with law enforcement partners to promote the use of slavery and trafficking prevention orders (STPO) and slavery and trafficking risk orders (STRO). Police forces, a National Crime Agency officer, immigration officers and the Gangmasters and Labour Abuse Authority can apply to a court to have an STPO or STRO imposed on an individual, or a court can grant an STPO for an individual on conviction for a modern slavery offence.

STPOs are intended to prevent slavery and human trafficking offences being committed by someone who has already committed such offences. They can be applied on conviction by a court for a slavery or trafficking offence, where the court feels there is a risk the defendant may commit another slavery or human trafficking offence and pose a risk to the public in doing; or a free-standing STPO can be made in respect of an individual who has been convicted or cautioned for a slavery or trafficking offence in the UK, or been convicted or cautioned for an equivalent offence abroad. A STPO may impose any restriction on the defendant that the court deems necessary for the purpose of protecting the public from harm. The minimum duration of an STPO is five years, effective immediately.

STROs can be made by a court in respect of an individual who has not been convicted of a slavery or trafficking offence, where the court is satisfied that there is a risk that the defendant may commit a slavery or human trafficking offence and that the STRO is necessary to protect against the risk of harm from the defendant committing the offence.



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STROs enable action to be taken where this is necessary to prevent serious harm to the public, notwithstanding the absence of a conviction. The minimum duration of the order is two years, effective immediately.

### Applying a STRO to a hand car wash owner

The Gangmasters and Labour Abuse Authority (GLAA) successfully applied for a slavery and trafficking prevention order against the owner of Kent car wash. The car wash, in Thanet, had been visited by Kent Police and the GLAA, with concerns identified around the absence of protective equipment, contracts and payslips for the workers and tax/national insurance records.

The STPO orders the named business owner to:

- keep full written records of all employees and their employment, and produce these on request
- pay his workers the National Minimum Wage and provide wage slips and contracts to them in their own language
- allow officers entry during business hours to inspect conditions and speak to the workers, and to inform the GLAA in writing of any changes in ownership of this car wash or any other owned or controlled by him
- register with Companies House and pay business rates to the local authority
- not to recruit people with no legal status in the UK, or employ anyone without a valid national insurance number.



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As noted previously in this guidance, various frontline council services may encounter victims of modern slavery through their routine work with local businesses, regulating private sector housing or delivering services such as waste collection and disposal. These services – and those in other frontline roles such as customer contact centres – therefore have a potential role in identifying victims of modern slavery.

Alongside identification, local regulatory services have a wide range of powers afforded to them through different pieces of legislation, often allowing them powers of entry into premises and powers to seize records. These powers can be an important tool in seeking to disrupt modern slavery through multi-agency working, and have been included in [a guide to the national enforcement powers](#) developed by the Hertfordshire Modern Slavery Partnership and the Home Office.

The LGA recognises that regulatory services in particular are extremely stretched following the impact of budget and staffing cuts linked to local government austerity, coupled with an ever-growing list of statutory duties and responsibilities. In this context, it is of course challenging for regulatory services to proactively prioritise activity to tackle modern slavery. However, there is nevertheless scope for services to:

- ensure they are aware of the signs of modern slavery and know what to do if they encounter it when undertaking their normal activities



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- undertake short-term, targeted projects or programmes of work focusing on high-risk businesses in their local areas, capacity permitting
- participate in multi-agency disruption activity in their local areas, as and when necessary.

This section sets out a short list of actions to help regulatory and frontline services support these activities.

## Understanding the council's approach to modern slavery

Heads of service should seek to identify whether there is a modern slavery lead within the council, and if so, who that person is. If not, they should seek to make links with the relevant officers working on modern slavery in different teams. This will assist with joining up different elements of modern slavery work and help with information sharing within the council.

It will be important that officers in regulatory services know how to share any modern slavery concerns arising from their work, and equally that other officers know who they can engage with about modern slavery within regulatory services team. Councils should therefore ensure that their modern slavery lead is easily identifiable to colleagues in other teams. As stated previously, there may be value in identifying an officer within services (including regulatory services) who can take a lead in developing expertise on this issue, providing advice to colleagues and acting as a point of contact for other council services.



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## Training

In order for officers working in regulatory and frontline services to be able to identify potential modern slavery victims, it is essential that they have adequate training. Officers should be supported with training and information which helps them spot the signs of modern slavery and understand the council's responsibilities to report and/or respond to suspected cases of modern slavery, including an overview of the National Referral Mechanism and how it works (although it is not expected that regulatory services officers themselves would make referrals into the NRM).

The [Home Office first responder training](#) provides a useful overview of councils' responsibilities as first responder organisations, covering what modern slavery is and how to identify it, as well the NRM process and making a referral. A number of anti-slavery organisations provide resources such as [an overview of modern slavery and guidance on spotting the signs of slavery](#), which regulatory and other services may find it helpful to draw on. Many will also offer in-person or online training on this issue.

Training should also cover how frontline officers can respond when they encounter suspected victims of modern slavery in the course of their work, including when to contact the police (if someone is believed to be in immediate danger); the council's pathways for sharing intelligence and making referrals about concerns; and any circumstances when it may be possible for officers to seek to signpost victims to relevant information, if it is safe for them to do so.



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## Working with external partners

Regulatory services officers should consider how they can work collaboratively with other partners in tackling modern slavery. The police, Gangmasters and Labour Abuse Authority (GLAA), National Crime Agency and HMRC all have an interest in investigating labour market offences and slavery. The GLAA's remit, in particular, provides opportunities for close cooperation with councils in a number of areas.

Where a council has concerns about suspected modern slavery in its area, it should consider whether a joint operation and investigation with other partners may be appropriate. One proactive step that regulatory services teams can take if they have not already worked with them is to seek to engage with the GLAA, and explore what links the organisation may already have in the local area or wider region.



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## Overview

A key objective of the Modern Slavery Act 2015 was identifying and combatting issues of modern slavery in UK and international supply chains. Section 54 placed a requirement on businesses with a budget of £36 million or more to publish an annual statement providing an overview of what they have done to identify and address risks of modern slavery through their supply chains, including all relevant due diligence activity.

Local government has the opportunity to use its own extensive buying power to help mitigate the risks of slavery occurring in its supply chain by adopting and embedding processes and procedures, in both procurement and contract management. The Government has now committed to introduce new measures to strengthen the Act and ensure that public bodies, as well as businesses, tackle modern slavery risks in supply chains.

Councils and other public sector bodies which have a budget of £36 million or more in England and Wales will fall 'in-scope', and will therefore be required to regularly report on the steps they have taken to prevent modern slavery in their supply chains. The Government has also committed to mandating the key topics that modern slavery statements must cover, from due diligence to risk assessment, and encouraging



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organisations to be transparent about the work they are doing to ensure responsible practices.

Changes to the legislation will also see the Government's proposal to introduce a requirement for in-scope public sector organisations to publish their modern slavery statements on the new online [modern slavery statement registry](#).

Councils will therefore want to ensure that the risks of modern slavery within their supply chains are understood, are being addressed and are documented in their supply chains statement. Many have already demonstrated their commitment to promoting a human rights approach towards procurement by publishing a modern slavery transparency statement on a voluntary basis: by summer 2022, over half the councils in England and Wales had done so. The LGA has shared these via the [local authorities' modern slavery statements portal](#).

Modern slavery risks can be found in contracts and suppliers of all sizes, and it should not be assumed that minimal exposure to contracts and suppliers beyond the UK precludes any organisation from incidents of abuse and suffering in UK-based contracts. The Global Slavery Index has estimated that there are 136,000 slaves in the UK, and forced labour is the largest contributor to this figure. Additionally, organisations should be alert to being exposed to slavery further down their supply chains, if not through their direct suppliers.

This chapter will go through the day-to-day processes and practices that council procurement and commercial teams can undertake to help mitigate the risk of modern slavery in their supply chains.



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## Gaining organisational commitment

Ensuring ongoing senior leader/management buy-in and commitment to support and provide resources to undertake modern slavery due diligence is crucial. Councils should also be seen as the ‘leaders of place’, working with local businesses and SMEs to raise awareness and provide support to their own efforts to tackle slavery in supply chains, as demonstrated in a [toolkit from Stop the Traffik and Shiva Foundation](#).

The most visible commitment councils can make towards eradicating modern slavery, both inwardly to the officers working on this and outwardly to residents and businesses, is to develop and publish a transparency statement which showcases the policies the council has in place, the processes it carries out, the training it delivers and the key performance indicators (KPIs) that it is striving to achieve on this issue.

## Modern slavery statement – getting started

A modern slavery transparency statement is a public facing document that should describe the steps an organisation has taken during the financial year to deal with modern slavery risks in its supply chains. The statement should be succinct, be published in a prominent place on the organisation’s website (for example the bottom of the homepage), and be approved at the highest level – signed by a senior member of the organisation (for councils, this is expected to be the chief executive and/or leader of the council).



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The Home Office statutory guidance recommends that organisations cover the following six areas in their statements:

- organisation structure and supply chains
- policies in relation to slavery and human trafficking
- due diligence processes
- risk assessment and management
- KPIs to measure effectiveness of steps being taken
- training on modern slavery and trafficking.

To accompany government guidance on producing and publishing modern slavery statements, the LGA's modern slavery statement guidance and procedures gives practical advice for councils on drafting their first statements (what to include, where to publish it and how to avoid some of the common pitfalls), as well as offering some practical procedural suggestions when carrying out supply chain due diligence.

It can also be used by those looking to build on previous statements, implement year-on-year improvements, and evidence the practical progress on how their councils are tackling the risks and incidences of modern slavery in their operations and supply chains.



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### **Modern slavery statement registry**

The Home Office has launched the 'Modern slavery statement registry' to make it easier for people to find modern slavery statements. As well as publishing their transparency statement on the council website, councils should add their most recent statement to the registry to share the steps they are taking to prevent modern slavery in their supply chains.

To add a transparency statement to the registry, a council will need to provide basic information about the organisation and its statement. Councils can also provide a summary of the statement by answering additional questions. Although these questions are optional, organisations are encouraged to answer all questions as fully as possible, to help improve understanding of modern slavery risks and best practice.

Once the Modern Slavery Bill introduces new laws on transparency statements, councils with a budget of £36 million and above will be required to publish their statement on the registry.



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## Training and awareness

Training is a fundamental way of raising awareness and ensuring that people understand the importance and risk of modern slavery and human trafficking. It is therefore important to provide procurement and commercial staff involved in tendering and managing contracts (including staff who may come into contact with the victims of modern slavery) with the appropriate training. This will help to raise awareness of the issue, how to identify the risks, and how to ensure that suspected instances of modern slavery are handled correctly.

There are a number of resources and e-learning modules available to the sector, and it is recommended that the relevant staff undertake training on a regular/annual basis. Details of how to access these resources are provided at the end of this section.

It is also advised that leadership and senior management teams receive training on how managing supply chains is linked to organisational values and the importance of developing transparency statements, even where councils are currently not required to do so (or may still not be under future requirements expected in the forthcoming Modern Slavery Bill).



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### Tackling modern slavery in supply chains

This free [Government Commercial College e-learning module](#) looks at how to mitigate modern slavery risks during the pre-procurement and specification stage by exploring links to the Social Value Model, key questions to ask suppliers, how to evaluate their responses and key considerations when developing contracts. It also covers how to mitigate modern slavery risks during the selection and award stage by discussing how to critically assess supplier documentations and responses and best practice of due diligence.

The e-learning course should give users a strong set of skills to:

- recognise how modern slavery can manifest in supply chains
- spot modern slavery risks in procurement and critically interrogate the assurances suppliers provide (such as social audits)
- drive improvements in modern slavery due diligence to create better outcomes for workers.

## Supply chain mapping: assessing the risks

Councils are advised to adopt a risk-based approach when it comes to mitigating and reducing the risk of incidences in their supply chains. A blanket approach to tackling all risks in the same way is likely to place unwarranted burdens on suppliers, and will not be the most effective use of procurement/commissioning resources.



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Although modern slavery can be found in any industry and any sector, Global Slavery Index [research](#) shows that it is more prevalent in certain countries, and there are certain core characteristics that place workers at heightened risk of being exploited.

The three main areas for consideration are:

1. **Industry type:** for example agriculture, construction, food processing.
2. **Supplier location:** for example Democratic Republic of the Congo, China, Cambodia, Pakistan.
3. **Type of product/service:** for example solar panels, electronics, garments.

Once councils have established contracts that fall into one or more of these categories, they should then consider the following factors to further identify the nature of the risk for that contract:

1. **Nature of workforce:** for example reliance upon low-skilled or unskilled labour, high numbers of temporary, seasonal, or agency workers, dangerous or physically demanding work.
2. **Context in which the supplier operates:** for example inadequate labour laws, presence of cheap labour and high numbers of vulnerable workers, working in areas of war or conflict.
3. **Business/supply chain models:** for example sub-contracting and complex supply chains with multiple tiers of suppliers.

This is explained in more detail in [‘Tackling modern slavery in government supply chains’](#).



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Undertaking this review of existing contracts will enable councils to identify where they should be focusing attention and resources. In general, high-risk areas for council spending include construction, electronics, textiles, agriculture and farming (food processing), adults' and children's care, facilities management and cleaning contracts, and these risks can occur irrespective of supplier size and contract value.

**It is important to recognise that having contracts solely with UK-based suppliers does not preclude there being modern slavery in councils' supply chains.**

### **LGA guidance on modern slavery in the construction industry**

Councils undertake a significant volume of construction work, ranging from programmes of repair and maintenance to major refurbishment and new-build projects across a host of different sectors including schools, social care, housing, infrastructure and highways. It is therefore crucial that councils use their spending power to ensure that the supply chain is behaving responsibly and identifying and combatting instances of exploitation wherever it may be found in the supply chain tiers.

Construction supply chains are complex and multi-tiered, supported by complex contractual relationships, significant reliance on subcontracting, the passing of risk down the supply chain, and high usage of temporary and transient labour. For these reasons, the risk of exploitation is high.

This guidance document, developed by the Nottingham Rights Lab, Action Sustainability, the LGA and local government procurement specialists, aims to support council procurement teams to embed requirements through the procurement process to identify and combat exploitation and slavery, wherever it may be found.



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## Engaging with suppliers

Modern slavery risks can be mitigated during the procurement processes, and councils are encouraged to engage and work closely with their primary (tier 1) suppliers on due diligence matters. The key objective should be to ensure that the council's suppliers are themselves aware of modern slavery risks and taking responsibility – not only for their own processes and employees, but are also considering the risks among their own suppliers further down the supply chain.

Whilst proportionality is encouraged throughout the process, several steps can be adopted throughout the procurement cycle, based on the risk profile identified through the mapping process.

## Early market engagement

Early engagement with the market is encouraged so that modern slavery risks can be raised before the tender goes live. This gives procurement teams a chance to ascertain how mature the market and suppliers are in dealing with this issue.

## Specification

Through their contracts, councils can specify requirements that are likely to reduce the risk of modern slavery further down the tiers of their supply chain. For instance, requiring the same industry or labour protections for subcontracted third parties that have been stipulated for the council's tier 1 contractors.



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Councils should, however, be mindful that any requirements reflected in the specification should be transparent and should not discriminate against particular types of suppliers, such as SMEs and VCS organisations.

## Selection stage

There are mandatory ([Public Contracts Regulations 2015](#)) and discretionary exclusion criteria for public contracts. Discretionary grounds could include the failure of a prospective in-scope bidder to have published a modern slavery transparency statement, although councils are always strongly advised to take their own legal advice before excluding a supplier from the process.

Councils are encouraged to review comparable statements by suppliers in the sector (which can be found in the [modern slavery statement registry](#)), as these will help gauge the level of maturity in the market.

## Evaluation and award stages

Contracts will vary in size and complexity, and councils should consider whether their required approaches can be met by businesses of all sizes and types. For contracts identified to be potentially high risk, some considerations to look at during the evaluation and award stages include:

- how subcontractors will be managed and monitored further down the supply chain



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- details and information on workforce conditions, factories, means of production, pay, working hours and recruitment processes
- abnormally low tenders that might suggest workers are not being paid adequately enough.

The Government's [Sourcing Playbook](#) sets additional controls within the section on the 'low cost bid referrals' process.

## Contract management

Modern slavery is an issue that requires monitoring throughout the life cycle of the contract and, as with an issue such as upholding health and safety standards in a construction contract, is reliant on effective supplier relationship management and ongoing communication.

Embedding modern slavery contract clauses into supplier terms and conditions allows councils to specify contractual information and monitoring requirements to ensure transparency, and demonstrates that steps are being taken to prevent modern slavery occurring within supply chains. Example terms and conditions include:

- suppliers not using, or allowing their subcontractors to use, forced or bonded labour
- contracts having a requirement for suppliers to cooperate with investigations or audits
- suppliers must complete modern slavery questionnaires.



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Modern slavery example clauses can be found in annex C of [‘Tackling modern slavery in government supply chains’](#).

## Monitoring supply chains

There are a range of proportionate activities that can be undertaken, based on the risk profile of the contract, with the resources councils have at their disposal. Regular supplier meetings are a good way of seeking assurance that legislative and contractual requirements are being met, with the frequency determined by the level of risk and length of the contract.

Supplier questionnaires are often seen as ‘tick box’ exercises, but the technology and tools that are available are becoming much more sophisticated and can produce automated reports and recommended action plans. Therefore, these can be a useful tool for councils to use as part of contract monitoring and as a basis for meaningful discussion with their suppliers.



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### Modern slavery assessment tool

The Home Office has developed a '[Modern slavery assessment tool](#)' (MSAT) to support public bodies to assess their own supply base for modern slavery risks. The tool asks suppliers questions about the processes they have in place for managing modern slavery risks, and provides automated recommendations on how to improve their modern slavery mitigating processes.

The MSAT is used by a range of public sector organisations, and a particular supplier may have already completed the assessment for one of them. When a supplier is invited to complete the questionnaire, they can use the invitation code to share their responses to a previous assessment.

## Audits

Audits can help provide a snapshot of conditions in a particular factory; or a social audit can gather information about recruitment processes, union affiliation and general working conditions. However, modern slavery is almost always very well concealed, and it is unlikely a council would have the resources and know-how to undertake their own audits on the scale required to uncover it.

If they have received intelligence that abuses have taken place, councils can seek to work collaboratively with other councils, specialist organisations, professional buying organisations (such as North East Procurement Organisation, Yorkshire Procurement



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Organisation or Eastern Shires Purchasing Organisation), and the Crown Commercial Service (all of whom will have frameworks for some of the higher-risk goods and services). There are third party audit specialists who can undertake these on councils' behalf.

### **Electronics Watch**

Electronics Watch is a not-for-profit, independent monitoring organisation bringing together public sector buyers, civil society organisations in electronics production regions, and experts in human rights and global supply chains. It supports public buyers to detect problems workers do not usually report to social auditors, and therefore to tackle labour abuse and modern slavery.

Electronics Watch provides electronics industry and modern slavery expertise to remedy problems and address systemic issues, using networks of local monitoring partners to provide public sector buyers with 'eyes and ears' on the ground in electronics production regions. This collaborative approach builds capacity to follow up on contractual labour and safety standards in electronics supply chains. At the same time, public sector buyer collaboration creates the strength and leverage to address issues such as forced labour and health and safety hazards, and to improve conditions for workers.

Electronics Watch focuses on monitoring electronics supply chains from component through to final assembly and manufacturing of finished ICT equipment, including desktop computers, tablets, monitors, keyboards, cables and headsets, scanners, printers, telephones and smart phones.



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## Key performance indicators (KPIs)

KPIs should be used to manage and monitor contracts, with milestones and targets outlining preventative measures the supplier will put in place and how they will measure and report back on these at regular, pre-determined intervals. It is advised that suppliers re-visit and build on their modern slavery policies and practices year on year. Examples of KPIs and KPI measures include:

- completing a set number of audits and requiring staff training or participation in monitoring surveys, whilst measuring the percentage of workers who receive information about their employment rights in a language they understand
- percentage of workers who are members of an independent democratic trade union.

## Remedying and responding to human rights abuse in a supply chain

Remediation is the process of ending situations of forced labour, labour trafficking and human rights abuses found to occur in supply chains, and as far as possible correcting any harms experienced by the victims. Councils will need to consider how they respond to reports of human rights abuses in their supply chains, and it is important to have plan in place for any such incidence of abuse. This should include having an effective and accessible reporting mechanism, processes and pathways in place to ensure those subject to abuse receive safeguarding and support.



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If an incidence is discovered, it must be dealt with immediately and proportionately, and in most instances it will be advisable to work collaboratively with the supplier to put a remediation plan in place. Terminating a contract may have adverse effects on the victim and is not always advised.

**The Home Office tackling modern slavery guidance states that:**

Other than in extreme cases, terminating a contract for reasons linked to modern slavery should only be considered where the issues continue to occur and the supplier is unwilling to co-operate and change, despite receiving help and support from you, and where you have considered all of your other contractual rights. You must first check that you have a right to terminate the contract and take legal advice. You should also ensure you have considered the potential detrimental effect on workers, particularly if these are overseas, and consider:

- Will contract termination stop the abuses occurring or will it result in working conditions worsening?
- What will happen to the workers if the supplier/business closes?
- Will they be able to find alternative employment?
- Will the workers be paid for the work they have already undertaken?

Where termination does occur, it does not discharge the responsibility to report alleged modern slavery conditions to the appropriate authorities to be investigated.



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All actions undertaken should focus on getting the best possible outcome for the victims and their families, taking into account any unintended negative consequences of your actions; and on taking steps to ensure that abuses cannot occur again.

Remediation plans and a step-by-step guide on how to deal with an incident can be found in '[Tackling modern slavery in government supply chains](#)'. Councils should consult legal teams and report any incidents to the appropriate law enforcement agencies.

## Embedding processes, sharing expertise and council coordination

Embedding some of the practices and processes outlined in this section will go a long way to mitigating the risk of incidences of modern slavery in supply chains, but councils can also look to work collaboratively:

- with other councils, regional procurement networks and local enterprise partnerships
- through the framework agreements councils have with professional buying organisations
- by aligning with non-governmental organisations (such as [Ethical Trading Initiative](#), [Unseen](#), [Shiva Foundation](#), [Stronger Together](#), [Slave-Free Alliance](#)) with a particular focus on supply chain activity
- with the wider private, community and voluntary sectors in their local area.

It is also advisable for procurement and commissioning leads to connect up with the different areas within the council that deal with modern slavery: this may include



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enforcement services such as environmental health, trading standards and licensing, housing and homelessness teams, community safety, children's services and adult safeguarding. Critically, procurement and commissioning teams should ensure they are linked up to the council's modern slavery lead officer or team (if there is one). This will ensure that any relevant intelligence from supply chains is shared with the council and local partners, and will help to ensure an integrated and holistic approach by the council to tackling modern slavery.

It is understood that councils will have different resources and capacity available to them. A certain degree of proportionality should be applied when carrying out these measures, while always placing the need to tackle modern slavery and support victims at the forefront of any activity and decisions that councils have to make.

'Tackling modern slavery in government supply chains' provides more comprehensive reading and includes annexes on examples of model questions for suppliers, supplier audits, example contract clauses and remediation action plans, as well as case studies.

## Further information and resources

Home Office: 'Transparency in supply chains: a practical guide'

LGA: 'Modern slavery in the supply chain hub'

Ethical Trading Initiative (ETI): 'Due diligence framework'

Unseen: 'Working with business self-assessment questionnaire'



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[Nottingham Rights Lab](#)

[Gangmasters and Labour Abuse Authority](#)

[Chartered Institute of Procurement and Supply \(CIPS\): 'Tackling modern slavery in the supply chain'](#)

[UN 'Guiding principles on business and human rights'](#)

[International Labour Organization: 'Resources on forced labour, human trafficking and slavery'](#)

[Shiva Foundation](#)

[Stronger Together](#)

[Slave-Free Alliance](#)

## Training and awareness

[Government Commercial College: 'Tackling modern slavery in supply chains'](#)

[ETI e-Learning](#)

[CIPS 'Ethics Test'](#)

[Stronger Together e-Learning](#)



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# Annex 1

## Indicators of modern slavery

This section provides a summary of indicators of modern slavery. Further detailed information is available in section three and annex A of the [statutory guidance on the Modern Slavery Act](#), which provides comprehensive guidance on modern slavery indicators by exploitation type and the age of the victim.

### Adult victims

#### General indicators for modern slavery

- distrustful of authorities and/or are reluctant to engage with authority figures or provide personal details, or the details of their employer
- expression of fear or anxiety
- signs of psychological trauma (including post-traumatic stress disorder)
- the person acts as if instructed by another
- injuries, apparently a result of assault or controlling measures
- evidence of control over movement, either as an individual or as a group
- found in or connected to a type of location likely to be used for exploitation
- restriction of movement and confinement to the workplace or to a limited area
- passport or documents held by someone else



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- cannot confirm any names and addresses of contacts, or a home address in the UK
- lack of access to medical care
- limited social contact/isolation
- limited contact with family
- signs of ritual abuse and witchcraft (juju)
- substance misuse
- person forced, intimidated or coerced into providing services
- does not know home or work address
- perception of being bonded by debt
- money is deducted from salary for food or accommodation
- threat of being handed over to authorities
- threats against the individual or their family members
- being placed in a dependency situation
- no or limited access to bathroom or hygiene facilities
- self-identifies.

### Indicators of forced or compulsory labour

- no or limited access to earnings, bank information or labour contract
- excessive wage reductions, withholding wages or financial penalties
- dependence on employer for a number of services, for example work, transport and accommodation



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- evidence workers are required to pay for tools, food or accommodation via deductions from their pay
- lack of information about rights as workers in the UK as well as support and advice services
- imposed place of accommodation
- found in poor living conditions
- evidence of excessive working days or hours
- deceived about the nature of the job, location, or employer
- employer or manager unable to produce documents required when employing migrant labour
- employer or manager unable to provide record of wages paid to workers
- poor or non-existent health and safety equipment or no health and safety notices
- going missing for periods of time
- any other evidence of labour laws being breached.

### Indicators of domestic servitude

- living with and working for a family in a private home or place of accommodation
- not eating with the rest of the family or being given only leftovers or inadequate food
- no private sleeping place or sleeping in shared space, for example the living room
- no private space
- forced to work in excess of normal working hours or being ‘on call’ 24 hours a day
- employer reports them as a missing person



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- employer accuses person of theft or other crime related to the escape
- never leaving the house without permission from the employer.
- Indicators of sexual exploitation
- advertises for sexual services offering individuals from particular ethnic or national groups
- sleeping on work premises
- movement of individuals between brothels or working in alternate locations
- individuals with very limited amounts of clothing or a large proportion of their clothing is 'sexual'
- only being able to speak sexual words in local language or language of client group
- having tattoos or other marks indicating 'ownership' by their exploiters
- person forced, intimidated or coerced into providing services of a sexual nature, which can be unprotected and/or violent
- person subjected to crimes such as abduction, assault or rape
- someone other than the potential victim receives the money from clients
- health symptoms (including sexual health issues).



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## Spotting the signs in children

There is a wide range of signs to look out for, including:

- Contact with others
- receives unexplained phone calls while in placement
- is being cared for by adult/s who are not their parents, and the quality of the relationship between the child and their adult carers is not good
- is one among a number of unrelated children found at one address
- no friends of their own age
- phone calls or letters from adults outside the usual range of social contacts
- adults loitering outside the child's usual place of residence
- significantly older boyfriend
- entering or leaving vehicles driven by unknown adults.

### Contact with authorities

- has not been registered with or attended a GP practice
- has not been enrolled in school
- truancy or disengagement with education.

### Physical signs

- shows signs of physical or sexual abuse
- sexually transmitted infection or unwanted pregnancy.



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## Behaviours

- has a history with missing links and unexplained moves
- has gone missing from local authority care
- persistently missing for periods of time, staying out overnight or returning late without explanation
- has limited freedom of movement
- performs excessive housework chores and rarely leaves the residence
- is excessively afraid of being deported
- the child has been seen in places known to be used for sexual exploitation
- evidence of drug, alcohol or substance misuse
- leaving home/care setting in clothing unusual for the individual child (inappropriate for age, borrowing clothing from older people)
- care placement breakdown
- pattern of street homelessness
- low self-image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity.

## Money

- has to pay off a large 'debt' (such as for travel costs) before having control over own earnings
- is permanently deprived of much of their earnings by another person
- accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding.



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# Annex 2

## Further resources

### General information on modern slavery

Unseen: [summary of possible indicators of modern slavery](#)

Unseen: [modern slavery and exploitation helpline](#)

Salvation Army: [modern slavery helpline and resources](#)

Institution of Occupational Safety and Health: [‘Tackling modern slavery together, the roles of governments, professionals and the public’](#)

Anti-Slavery International: [overview of modern slavery](#)

The A21 Campaign: [counter-trafficking toolkit](#)

### Government guidance and tools

Home Office: [‘Modern slavery statutory guidance for England and Wales’](#)

[Homelessness code of guidance for local authorities](#)



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Home Office: [national referral mechanism guidance](#)

Home Office: [report modern slavery online form for first responders](#)

Home Office: [first responder training \(policingslavery.co.uk\)](#)

Home Office: [child victims of modern slavery training module](#)

Home Office: [child exploitation disruption toolkit](#)

[Gangmasters and Labour Abuse Authority](#)

## Homelessness

Crisis: [‘Project TILI’ resources and reports](#)

[St Mungo’s ‘Routes home’ resources](#)

## Other modern slavery guidance, tools and information

AIRE Centre: [free legal advice for victims of trafficking](#)

Human Trafficking Foundation: [modern slavery protocol for local authorities](#)

Human Trafficking Foundation: [NRM guidance](#)

University of Nottingham: [anti-slavery partnership toolkit](#)

West Midlands Anti-Slavery Network: [adult modern slavery pathway partnership template](#)



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West Midlands Anti-Slavery Network: [NRM explanatory document](#)

London Modern Slavery Leads Network: [annual report 2020-21](#)

The A21 Campaign: [‘Can you see me?’ awareness raising videos and tool](#)

## LGA guidance and support

LGA: [‘Supporting modern slavery victims: guidance and good practice for council homelessness services’](#)

LGA: [‘Tackling labour abuse and modern slavery in the hand car wash sector’](#)

LGA: [‘Modern slavery in supply chains’](#)

LGA: [‘Public health approaches to reducing violence’](#)

LGA: [modern slavery resources](#)

## Modern slavery support and survivor services

Human Trafficking Foundation (HTF): [map of survivor support services](#)

HTF: [London directory of survivor support services](#)

HTF: [survivor hub](#)

HTF: [survivor emergency support fund](#)



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