



Sandwell Anti-Slavery Partnership

First responder guidance
and victim care pathways

Updated July 2023

Introduction

Welcome to the Sandwell First Responder Guidance and Victim Care Pathways. This guide has been created to support first responders who may come into contact with victims of modern slavery.

As a first responder, you play a crucial role in identifying and referring victims of modern slavery for support and protection. This guide will provide you with the necessary information to recognise the signs of modern slavery, understand the referral process, and connect victims with the appropriate support services.

Sandwell takes a partnership approach to tackling modern slavery, and this guide has been developed in conjunction with other key agencies involved in supporting victims of modern slavery. We believe that by working together, we can provide a comprehensive response to modern slavery in our communities.

We hope that this guide will serve as a useful tool for all first responders and agencies working to protect and support victims of modern slavery in Sandwell. Thank you for your ongoing commitment to this important work.

Purpose

The purpose of this guidance is to provide clear and practical information to First Responders in Sandwell on how to identify and respond to potential victims of modern slavery.

The guidance aims to:

- Clarify the role and responsibilities of First Responders in identifying and supporting victims of modern slavery.
- Outline the key steps for referring potential victims of modern slavery to the National Referral Mechanism (NRM).
- Provide information on the Sandwell approach to modern slavery, including key partnerships and processes.
- Highlight the importance of victim-centered care and the need for ongoing support beyond the referral process.
- Provide information on key disruption tactics used in Sandwell to prevent and combat modern slavery.

Overall, this guidance is designed to support First Responders in Sandwell in their efforts to identify, support, and ultimately protect victims of modern slavery.

This guidance has been adapted from the Governments Modern Slavery: Statutory Guidance for England and Wales the full document can be found in the **Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland**



Understanding Modern Slavery

Key points

- Modern slavery includes human trafficking, slavery, servitude, forced or compulsory labour, and sexual exploitation
- Human trafficking involves three components: action, means, and purpose of exploitation. All three components must be present for an adult trafficking case, but for child trafficking, the means component is not required
- Exploitation in human trafficking cases can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality, and organ removal
- Some people may be victims of modern slavery even if they are not victims of human trafficking. This includes those who have been subjected to slavery, servitude, and forced or compulsory labour
- Human trafficking is different from human smuggling
- There are also common misconceptions about modern slavery, such as the belief that UK nationals cannot be victims or that rejecting offers of help means a person cannot be a victim

What is modern slavery?

01

Labour exploitation

This type of modern slavery involves individuals being forced to work in conditions that are often dangerous and unhealthy, without appropriate pay or legal rights. Victims may be working in industries such as agriculture, construction, or manufacturing.

02

Criminal exploitation

Criminal exploitation involves individuals being forced to engage in criminal activity such as drug trafficking, theft, or other illegal activities. Victims may be threatened with violence or harm to themselves or their families if they do not comply.

03

Sexual exploitation

This involves the use of force, threats or deception to coerce individuals into engaging in sexual activities, including prostitution, pornography or sexual servitude. Victims may be held captive, threatened with violence, or have their travel documents or other identification taken away.

04

Domestic servitude

This type of modern slavery involves individuals being forced to work in private households as domestic servants, often without pay or any legal rights. Victims may be subjected to physical, emotional or sexual abuse by their employers, and may be prevented from leaving the household.

Key points

- Identifying potential victims of modern slavery can be challenging, as they may not recognise themselves as victims or may be reluctant to come forward
- First responders and frontline staff should be familiar with indicators of modern slavery, including general, physical, and psychological signs, as well as situational and environmental factors
- Some indicators are specific to child victims and certain types of exploitation, such as "county lines" cases
- A First Responder's decision to refer a potential victim to the NRM is based on professional judgment and the presence of indicators of modern slavery
- Victims of modern slavery may be reluctant to come forward or not recognise themselves as victims.
- Personal circumstances such as age, family relationships, and physical/mental disability may be considered in determining if someone has been subjected to slavery, servitude, or forced labour
- Consultation with other professionals may be helpful in some cases

Types of modern slavery?



- **Sexual exploitation:** victims may be forced into prostitution, pornography or lap dancing for little or no pay. They may be deprived of their freedom of movement and subjected to threats and violence.



- **Labour exploitation:** a victim is made to work 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 and under constant threat.



- **Forced criminality:** victims can be forced to participate in a range of illegal activities including pick pocketing, shop lifting, cannabis cultivation, county lines exploitation and other activities. The Modern Slavery Act provides for a defence for victims who have been forced into criminality.



- **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. In some cases, forced marriage can lead to domestic servitude.



- **Organ harvesting:** victims are trafficked for their internal organs (typically kidneys or the liver) to be harvested for transplant.



- **Forced marriage:** where people are forced into marriage for a range of reasons including exploiting the rights conferred on them by citizenship or for domestic servitude.



- **Financial exploitation:** for example, benefit fraud, where benefits are falsely claimed by perpetrators on behalf of their workers; bank accounts being opened in a victim's name but used by perpetrators; or workers' wages being paid directly into the exploiters, own bank accounts by companies who think they are paying a worker individually

Key points

- The main indicators of modern slavery can be categorised into general, physical, psychological, situational, and environmental factors
- General indicators include victims who may believe they are forced to work against their will, unable to leave their work or home environment, and show signs that their movements are being controlled
- Physical indicators include injuries that appear to be the result of an assault or control measures, while psychological indicators include fear, anxiety, and distrust of authorities
- Situational indicators may include being threatened with being handed over to the authorities, having no access to medical care, and living in poor accommodations
- Environmental indicators may include limited contact with families and people outside of their immediate environment. Victims may also be forced, threatened, or deceived into working in poor conditions, receive little or no payment, and have no access to their earnings

Indicators of modern slavery?

Belief that they must work against their will	Inability to leave their work or home environment	Signs of controlled movement or restricted freedom	Fear, anxiety, or signs of trauma	False identity or travel documents, or none at all
Found in a location that's likely to be used for exploiting people	Unfamiliarity with the local language	Violence or threats of violence against themselves or their loved ones	Injuries that appear to be the result of assault or control measures	Distrust of authorities or fear of being handed over to them
Fear of revealing their immigration status	Lack of possession of their passports or other identity documents	Coming from a known source of human trafficking	Transport fees paid by facilitators, to be paid back through work or services	Lack of knowledge of home or work address
Allowing others to speak for them or acting as if instructed by someone else	Forced, threatened, or deceived into working in poor conditions	Punished for not complying with orders	Unable to negotiate working conditions	Receiving little or no payment or having no access to earnings
Excessive working hours with no days off	Living in poor or substandard accommodations	No access to medical care	Limited or no social interaction or contact with families or people outside of their immediate environment	Inability to communicate freely with others
	Perception of being bonded by debt	Situation of dependence	Acting on false promises	

Key points

Identifying victims of modern slavery is a crucial part of the response to this heinous crime.

Unfortunately, victims of modern slavery are often hidden from view and can be difficult to identify.

Therefore, it is important to have a solid understanding of the indicators of modern slavery, and to approach any situation with an open mind and a willingness to investigate further.

Identifying victims of modern slavery?

Here are some key steps for identifying potential victims of modern slavery:

- **Look for indicators of modern slavery:** These may include signs of physical or emotional abuse, lack of personal identification documents, being controlled or coerced by another person, and being forced to work against their will
- **Consider the circumstances:** Pay attention to any unusual circumstances, such as an individual who appears to be fearful or anxious, who is unable to move freely, or who seems to be under the control of someone else.
- **Ask questions:** It is important to engage with the individual in a sensitive and non-judgmental way, and to ask questions that can help to reveal more information about their situation
- **Consider the context:** Victims of modern slavery can come from all walks of life and may be found in a range of industries, from agriculture and domestic work to construction and hospitality
- **Keep an open mind:** It is important to approach any situation with an open mind and to consider the possibility that someone may be a victim of modern slavery, even if there are no obvious indicators
- **Seek advice:** If you are unsure about whether an individual may be a victim of modern slavery, it is important to seek advice from a relevant expert or agency
- **Document everything:** It is important to keep detailed records of any interactions with the individual, including any indicators of modern slavery that you have observed, and any information that they have provided
- **Report your concerns:** If you suspect that an individual may be a victim of modern slavery, it is important to report your concerns to the relevant authorities and to follow the appropriate referral procedures. If the concern is in Sandwell, then please refer all concerns to SHOP modern_slavery@sandwell.gov.uk



Sandwell Approach to Modern Slavery



Roles and responsibilities

Key points

- Certain public authorities in England and Wales have a legal obligation to notify the Home Office when they encounter potential victims of modern slavery
- First Responder Organisations are authorised to refer potential victims to the National Referral Mechanism (NRM), which is the system used to identify and support victims of modern slavery in the UK. Some First Responder Organisations are public authorities, while others are not
- The Home Office's Competent Authorities are responsible for assessing cases referred to the NRM to determine whether they meet the criteria for being recognised as victims of modern slavery
- There are two Competent Authorities: the Single Competent Authority (SCA) and the Independent Anti-Slavery Commissioner's Office (IECA), and each has a defined group of cases to assess
- Collaboration and information sharing between organisations is essential to effectively tackle modern slavery

Roles and responsibilities

Law enforcement (police, NCA,): responsible for leading modern slavery investigations, identifying potential victims, making referrals into the NRM, arresting perpetrators, and raising **awareness** in their jurisdictions.

Local Authorities: have a statutory duty to safeguard child victims and adults at risk and are responsible for identifying potential victims and making referrals into the NRM. They may also provide homelessness services to victims of modern slavery.

Border Force, UKVI and Immigration Enforcement: responsible for maintaining the security and integrity of the UK border, taking decisions about who has the right to visit or stay in the country, and enforcing immigration law.

Competent Authorities (Home Office): responsible for making decisions about who is recognised as a victim of modern slavery and for managing the National Referral Mechanism (NRM).

UK Visas and Immigration (Home Office): responsible for implementing the NRM and providing support and assistance to potential victims of modern slavery.

Modern Slavery Helpline: provides a 24/7 hotline for reporting suspicions of modern slavery and getting advice on how to help potential victims.

Gangmasters and Labour Abuse Authority: responsible for regulating businesses that supply workers to the agriculture, horticulture, and shellfish-gathering industries to prevent labour exploitation and human trafficking

First Responder Organisations: Barnardo's, BAWSO, Kalayaan, Medaille Trust, Migrant Help, New Pathways, NSPCC, Refugee Council, The Salvation Army, Unseen UK

The role of the First responder

The role of the first responder in identifying and responding to potential cases of modern slavery is vital. These individuals play a crucial role in identifying indicators of exploitation, assessing the level of risk, and providing support and guidance to victims. By working closely with victims and relevant agencies, first responders can help ensure that victims receive the necessary support and that perpetrators of modern slavery are held accountable.

Identify indicators of modern slavery: As a first responder, it is essential to be able to recognise signs of physical or emotional abuse, control or coercion by another person, lack of personal identification documents, and being forced to work against their will.

Assess the level of risk: First responders must also assess the level of risk to the individual, considering any immediate threats to their safety or well-being. This assessment will allow you to provide the necessary support and guidance to the victim.

Obtain consent: It is essential to obtain the victim's consent to make a referral to the NRM and explain the purpose and process of the NRM. Providing clear and accurate information about the process can help build trust and encourage victims to engage with the support.

Gather information: As a first responder, it is crucial to gather as much information as possible about the victim's circumstances, including personal details, the nature of the exploitation they have experienced, and any evidence that can support their claim.

Complete the NRM referral form: Completing the NRM referral form is an essential step in the process of supporting victims of modern slavery. The form provides accurate and detailed information about the individual's situation and the reasons for the referral.

Submit the referral form: Once the referral form is complete, it must be submitted to the Home Office via email, fax, or post. It is essential to submit the form as soon as possible to ensure that the victim receives the necessary support.

Provide ongoing support: First responders must provide ongoing support to victims, including access to medical care, legal advice, and emotional support, as required. This support can help victims feel safe and supported as they navigate the complex process of recovering.

Keep accurate records: It is crucial to keep accurate and detailed records of all interactions with the victim, including any referrals made and the outcomes of those referrals. These records can help track the victim's progress and ensure that they receive support.

Maintain confidentiality: Maintaining confidentiality is critical when working with victims of modern slavery. It is essential to ensure that the victim's personal information is not disclosed to unauthorised parties.

Cooperate with relevant agencies: As a first responder, it is crucial to cooperate with the Home Office and other relevant agencies throughout the NRM process, providing additional information or support as required.

The role of the Local Authority Single Point of Contact (SPOC) for modern slavery:

The local authority SPoC for modern slavery is responsible for coordinating all referrals to the Sandwell Human Trafficking Operational Partnership (SHOP) and for keeping data and sharing information. They will chair multi-agency SHOP meetings and briefings, identify victims, provide advice and guidance, collaborate on modern slavery concerns, plan disruption tactics, provide tactical advice, plan multi-agency interventions, support and facilitate referrals into the National Referral Mechanism (NRM), and facilitate accommodation when required.

The SPoCs role is to support first responders in their efforts to identify and respond to cases of modern slavery, but they will not manage individual cases. They will provide training and support to staff, and work to ensure that multi-agency safeguarding arrangements are in place to protect victims of modern slavery.

It is important to note that the local authority SPoC for modern slavery is not a case holder, and their role is to support and coordinate the efforts of other agencies in responding to cases of modern slavery. They will work closely with the police and other partners to ensure that victims are identified and safeguarded, and that perpetrators are brought to justice.

Importance of working with the Local Authority Single Point of Contact (SPOC) for modern slavery:

- **Coordinated response:** The local authority SPOC for modern slavery serves as a centralised point of contact for coordinating and collaborating with all relevant agencies and stakeholders, including law enforcement, health and social care providers, NGOs, and others. This ensures that everyone is working together to effectively respond to modern slavery concerns and identify potential victims
- **Data and intelligence sharing:** By reporting concerns to the local authority SPOC, agencies can share information and intelligence about potential cases of modern slavery, which can help identify patterns and trends in criminal activity. This can also help inform local strategies for preventing and disrupting modern slavery
- **Support and guidance:** The local authority SPOC for modern slavery can provide expert advice and guidance to first responders, including training on how to identify and respond to potential cases of modern slavery. They can also provide support to victims and help them access the services they need
- **Multi-agency safeguarding:** The local authority SPOC for modern slavery can facilitate multi-agency safeguarding arrangements where they are in place, which can help ensure that all potential risks to victims are identified and addressed
- **Referrals to the National Referral Mechanism (NRM):** The local authority SPOC for modern slavery can support and facilitate referrals into the NRM, which is the UK's system for identifying and supporting potential victims of modern slavery. This can help ensure that victims receive the appropriate support and protection they need

The role of the Slavery and Human Trafficking Partnership (SHOP)

The Slavery and Human Trafficking Operational Partnership (SHOP) in Sandwell is a vital component of the local response to modern slavery. SHOP brings together local authorities, law enforcement agencies, and other partners to identify and disrupt instances of modern slavery and support its victims.

A multi-agency approach is crucial for addressing modern slavery effectively, given the complex and often hidden nature of this crime. By working collaboratively, SHOP partners can share information and expertise, coordinate resources and tactics, and respond to incidents of modern slavery in a timely and effective manner.

If you are concerned about an adult who may be a victim of modern slavery, it is essential that you report this to the local authority SPoC for modern slavery. Even if you are unsure about the nature of the concern, it is better to share the information and let the experts assess it, rather than risk leaving someone in harm's way. The SPoC will work with SHOP partners and other agencies to determine the best course of action and provide support to the victim where needed.

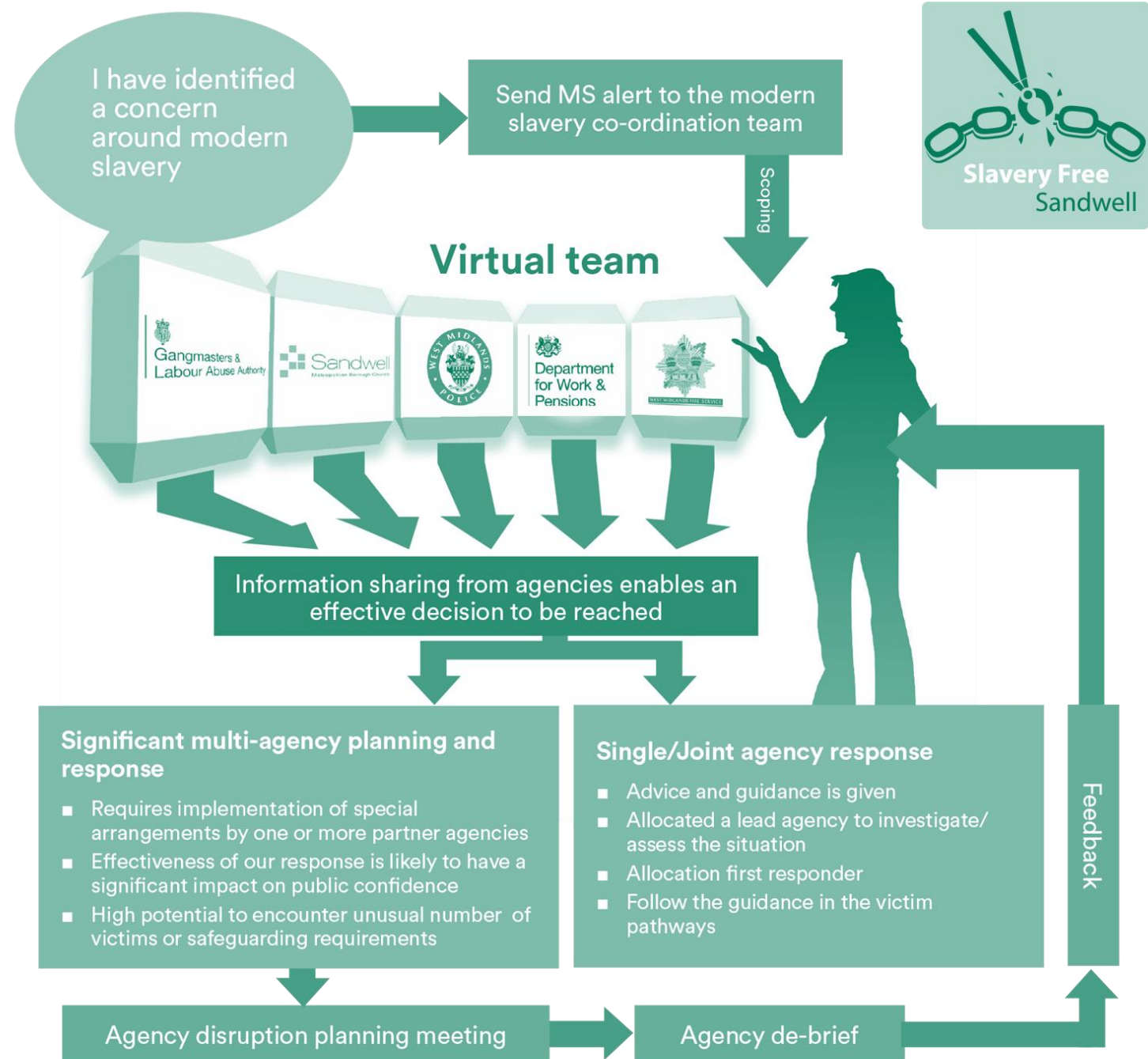
Email: modern_slavery@sandwell.gov.uk

Why all modern slavery concerns should be reported to the SHOP:

- SHOP is a multi-agency partnership that brings together expertise from different agencies, including the police, local authorities, health services, and charities, to respond to modern slavery concerns
- SHOP provides a coordinated approach to tackling modern slavery and ensures that victims receive the support and protection they need
- Reporting all modern slavery concerns to SHOP ensures that no victim is missed or overlooked, and that there is a comprehensive understanding of the scale and nature of the problem in the local area
- SHOP has access to a range of tools and tactics for disrupting modern slavery, including legal powers to close down businesses, conduct raids, and issue slavery and trafficking risk orders
- Reporting modern slavery concerns to SHOP helps to build a picture of the wider network of criminal activity, which can help to identify and disrupt the organised criminal gangs behind modern slavery
- Even if a concern is not immediately actionable, SHOP can use the information to build intelligence and develop strategies for addressing modern slavery in the future
- By reporting all modern slavery concerns to SHOP, first responders can ensure that they are fulfilling their duty to safeguard vulnerable individuals and prevent harm

SHOP Process

- All modern slavery concerns should be reported to SHOP
- SHOP sends an alert to the modern slavery team upon receiving a concern
- The virtual scoping process is used to gather intelligence and identify whether a significant multi-agency response is required
- Responses to modern slavery concerns can involve a single agency or multiple agencies, depending on the circumstances
- Agency disruption planning takes place to disrupt any modern slavery activity
- Tactical advice and agency briefs and debriefs are provided to all agencies involved in the response



The role of the Slavery/Trafficking Adult Safeguarding Case Conference (SASCC)

A Slavery/Trafficking Adult Safeguarding Case Conference (SASCC) is a multi-agency meeting aimed at delivering a robust framework for safeguarding adult victims of slavery/trafficking before their referral into the National Referral Mechanism (NRM). The forum is non-statutory and based on the West Midlands Domestic Abuse MARAC operating protocol. Its purpose is to establish accountability, clarify referral pathways, and ensure the process operates in the best interest of victims.

During the SASCC, different statutory and voluntary sector agencies come together to share information on adult victims of slavery/trafficking and to collaboratively construct and implement a safeguarding plan that offers professional support in managing any immediate risks and needs associated with the victim. The SASCC aims to facilitate, monitor, and evaluate information sharing that enables appropriate actions to enhance safeguarding and to obtain greater transparency as to the nature of the crime type within West Midlands. The conference also supports the ambition to improve criminal justice outcomes.

The SASCC is a victim-focused meeting that aims to increase the safety, health, and wellbeing of adult victims of slavery/trafficking. It shares information to determine whether the victim is a potential victim of slavery/trafficking and ensures that the First Responder can furnish the Single Competent Authority with the most up-to-date narrative to inform the NRM decision-making process. The conference aims to reduce repeat victimisation, improve agency accountability, and support law enforcement agencies as appropriate, while accepting that the needs of the victim will take primacy. Any challenges in delivering a robust safeguarding plan for victims will be identified, collated, and escalated during the conference.

When should a modern slavery concerns be reported to the SASCC:

- When an adult is identified as a potential victim of slavery or trafficking
- When the case is complex and requires coordination between multiple agencies to safeguard the victim
- When there is a need to develop a comprehensive safeguarding plan for the victim that addresses their immediate risks and needs
- When there are challenges in delivering a robust safeguarding plan for the victim
- When there is a need for greater transparency as to the nature of the crime type within a region
- When there is a need to enhance information sharing between different statutory and voluntary sector agencies to facilitate appropriate actions to enhance safeguarding
- When there is a need to reduce the risk of repeat victimisation
- When there is a need to improve agency accountability and support law enforcement agencies as appropriate
- When there is a need to evaluate the effectiveness of current safeguarding arrangements and identify any areas for improvement
- When there is a need to support the victim's best interests and improve criminal justice outcomes

The role of Horizons is the Child Exploitation Hub

Horizons is the Child Exploitation Hub in Sandwell. It is a multi-agency partnership that brings together professionals from a range of agencies including children's social care, education, health, police, and probation to work together to safeguard children and young people who are at risk of, or are experiencing, sexual and criminal exploitation.

The Hub's main aim is to prevent exploitation from happening in the first place, but if exploitation has occurred, the Hub provides support, advice, and a coordinated response to the child or young person and their family. It works to ensure that children and young people are safeguarded, have access to appropriate support and services, and that those responsible for the exploitation are identified and brought to justice.

The Hub has a dedicated team of professionals who have specialist knowledge and expertise in child exploitation. They work together to share information, identify risks, and develop coordinated action plans to address the needs of children and young people who are at risk of, or are experiencing, exploitation.

Horizons also provides training, guidance, and support to professionals who work with children and young people to help them identify the signs of exploitation and understand the best ways to respond to concerns. They work to raise awareness of child exploitation and to engage with children and young people to help them understand the risks and how to stay safe.

Why all child exploitation concerns should be reported to the Horizons:

- Horizons is a specialist team with expertise in identifying and responding to child exploitation and abuse
- They have access to a range of resources and interventions to support young people who may be at risk of exploitation
- Horizons works in collaboration with other agencies and services, ensuring a coordinated and effective response to child exploitation
- They provide advice, guidance, and training to practitioners on identifying and responding to child exploitation and abuse
- Horizons supports the development and implementation of multi-agency safeguarding arrangements in Sandwell
- By working with Horizons, practitioners can ensure that they are providing the best possible support to young people who may be at risk of exploitation, and can access specialist expertise to help them in their role.



Referring to the National Referral Mechanism (NRM)

Adult presents to service/identified on a visit Service suspects that person may be a potential victim of trafficking/slavery

YES

Do they Feel safe? Are they alone/Able to talk to you Freely?
freely

NO

Discuss their situation and your concerns with the potential victim.

Refer case to the slavery and human trafficking partnership (SHOP) with an overview of the concern, the individuals information (Name, Address, DOB)
SHOP will help to formulate a plan around the NRM and safeguarding
You can also contact the modern slavery helpline for advice 08000 121 700

Try to facilitate a conversation with them on their own – this may be the only opportunity to engage with them. If not possible, ask them to return alone ASAP

Inform the SMBC modern slavery team modern_slavery@Sandwell.gov.uk

SHOP will help to agree who will submit the NRM
Explain [NRM process and why enter the NRM](#)
Does the person wish to proceed?

YES

Did the person return?

NO

YES

NO

Consider if anyone under 18 may be involved. If necessary, refer to your organisation's child protection processes.

Record details of concerns, include all details that could help to identify the person if they came to notice again.

Provide information about their rights in the UK and the Modern Slavery Helpline number:
08000 121 700

Pass information on to [Force Intelligence](#)

Complete [Duty to Notify form](#)

Notify the SMBC modern slavery team modern_slavery@sandwell.gov.uk

Submit the NRM form

Support with temporary accommodation while waiting for the RG decision
Facilitate referral to the salvation army victim care contract
Ensure immediate safeguarding plans are in place (Food, health, clothes)

Inform the SMBC modern slavery team modern_slavery@Sandwell.gov.uk

IN case of emergency always ring 999 or seek medical help first if required

The National Referral Mechanism (NRM)

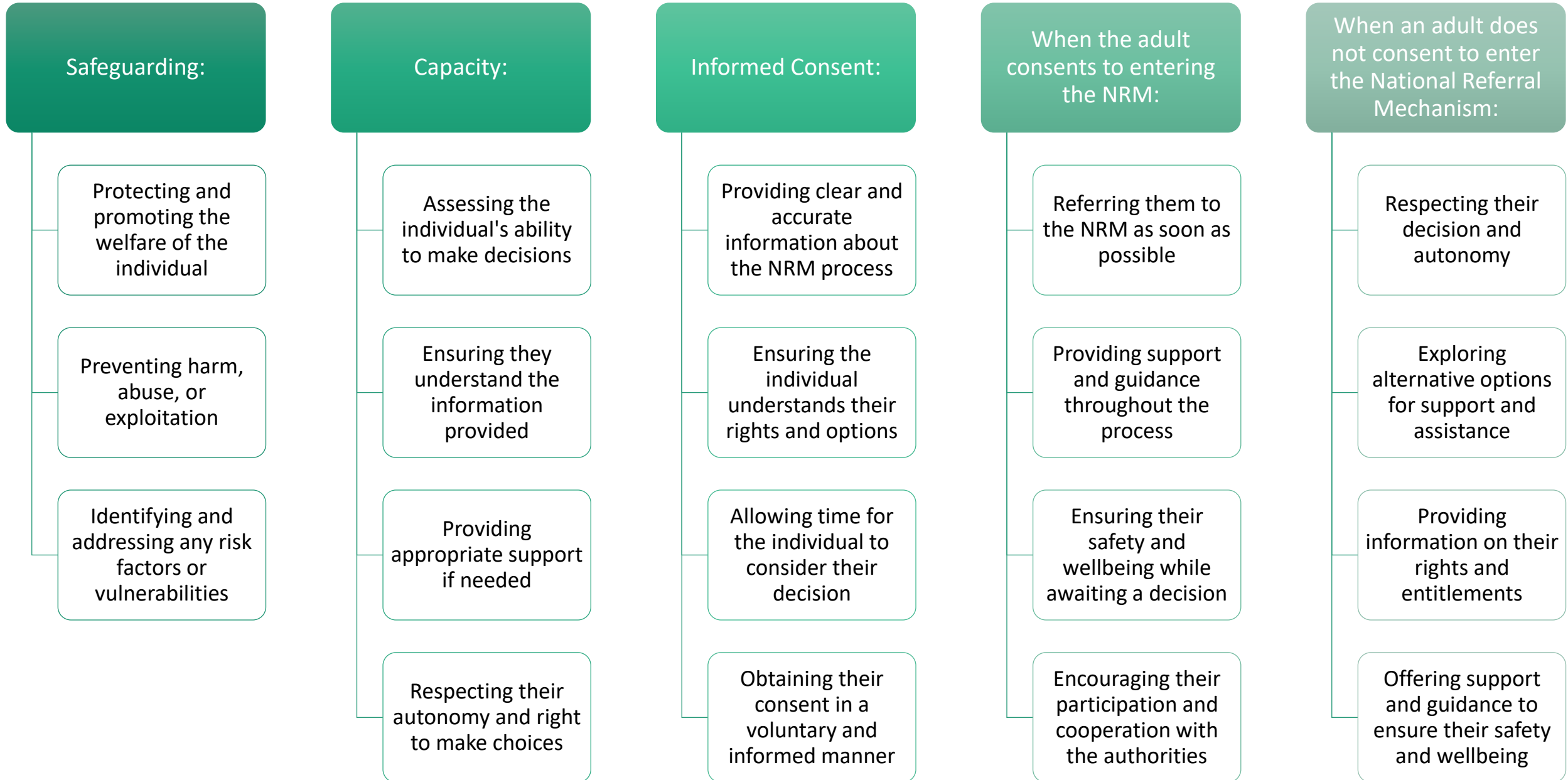
The National Referral Mechanism (NRM) is a framework established by the UK Government to ensure that potential victims of modern slavery and human trafficking receive the appropriate support and protection they require. The NRM process is designed to provide a consistent and coordinated approach to the identification, assessment, and protection of victims. Below are some key points about the NRM:

- The NRM is available to all potential victims of modern slavery and human trafficking in the UK, regardless of their nationality or immigration status
- The NRM is a two-stage process: identification and referral
- The identification stage involves a trained individual or organisation, known as a 'First Responder,' who is responsible for identifying potential victims and making referrals to the NRM if appropriate
- The referral stage involves the Single Competent Authority (SCA), which is responsible for determining whether an individual is a victim of modern slavery and for providing appropriate support and protection
- If an individual is identified as a potential victim and referred to the NRM, they will be provided with support and protection, including access to accommodation, medical care, and legal advice.
- The NRM also provides access to specialist support services, including counselling and mental health support.
- Once a (CG) Conclusive Grounds Decision has been made, the NRM process is concluded, and the individual may be eligible for further support under the UK government's victim support framework.

Key points why all modern slavery concerns should be reported to the NRM:

- **Comprehensive Support:** Referring all cases to the NRM ensures victims receive tailored support.
- **Legal Requirement:** Many countries mandate the referral of modern slavery cases to the NRM.
- **Collaborative Response:** Referrals facilitate collaboration among agencies for better victim care and prosecution.
- **Data Collection:** Referrals help gather accurate data for policymaking and targeted interventions.
- **Empowerment and Justice:** Referrals empower victims, enabling access to justice and dismantling criminal networks.
- **Specialised Expertise:** The NRM possesses specialised knowledge and expertise in dealing with modern slavery cases, ensuring victims receive appropriate assistance and protection.
- **National Coordination:** Referring all cases to the NRM ensures a coordinated national response, maximising resources and improving the effectiveness of efforts to combat modern slavery.

Referring Adult victims to the National Referral Mechanism



Key points

- Support for child victims is provided through the Local Authority children's services, not the MSVCC
- First Responders encountering a child victim should contact the Local Authority children's services immediately for support
- An NRM referral should still be made by the First Responder who identified the child victim using the Modern Slavery Portal
- Child victims do not need to consent to enter the NRM
- Making an NRM referral discharges the Duty to Notify
- Efforts should be made to ensure the child understands what is happening
- The First Responder should make a referral to the Independent Child Trafficking Guardian (ICTG) service if available in the area

Cases already known to children's or adult services

- If a Sandwell Local Authority social worker has a concern around modern slavery for the child they should discuss the case with the Horizons team
- If a Sandwell local authority social worker has a concern around modern slavery for an adult, they should discuss the case with SHOP (modern_slavery@sandwell.gov.uk)

Referring Child victims to the National Referral Mechanism

Safeguarding

- Local Authority children's services should be contacted immediately when encountering a potential child victim of modern slavery.
- Best practice for children's social care is to keep children informed of what is happening using trauma-informed and age-appropriate methods of communication in a language that they fully understand.

Capacity

- As children are not legally able to provide consent, an NRM referral should be made for potential child victims regardless of their ability to consent.

Referring a Child to the NRM

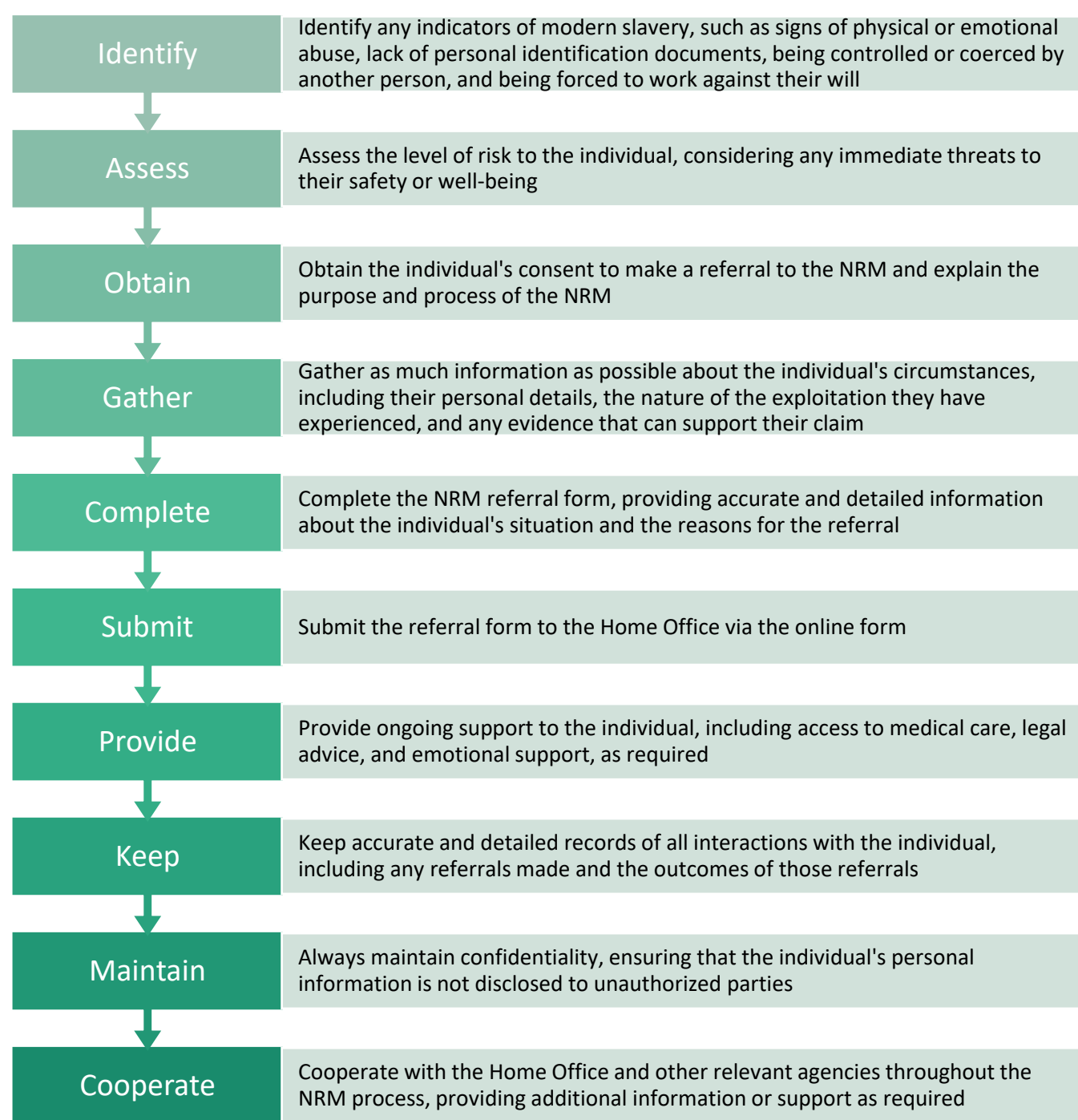
- An NRM referral should be made by the First Responder who identified the potential child victim using the Modern Slavery Portal.
- Making this referral discharges the Duty to Notify.
- First Responders should always make a referral to the Independent Child Trafficking Guardian (ICTG) service

NRM Checklist

Before submitting an NRM all Adult referrals should be discussed with the SHOP and child referrals should be discussed with Horizons.

In addition to the above checklist, first responders should also consider the following when completing the NRM:

- Is there a clear indication of Modern Slavery in the referral?
- Are there specific indicators of modern slavery included in the referral?
- Are there independent expert reports that indicate whether an individual is a victim?
- Is there confirmation of travel records, for example, that the individual was in a country where the claim is centred? (Note: Travel records, without some other specific evidence, will not usually be sufficient to meet the RG threshold)
- Does the victim present with added vulnerabilities?
- Is there supporting evidence from an independent witness, e.g., a police officer?
- Is there any evidence raised by the First Responder regarding the credibility of the account?
- Is there prosecutorial evidence against the accused exploiter that can be considered?
- Are there views of trusted third-parties, such as Adult Safeguarding Services (where engaged in the case of adults), Child Social Services or the Children's Safeguarding Services, Independent Child Trafficking Guardians (where appointed)?



Key points

- **General evidence:** This refers to objective information about the country of origin, including known or emerging patterns of modern slavery. This can include UK Visas and Immigration Country Policy and Information Notes, as well as reports such as the US Trafficking in Persons Report. While general evidence can provide context, it is usually not sufficient by itself to meet the threshold for a positive decision
- **Specific evidence:** This includes a range of evidence that is more directly related to the individual case, such as indicators of modern slavery, expert reports, travel records, witness statements, information provided by the first responder, and the views of trusted third parties such as social services or guardianship services. The presence of specific evidence is typically more important in determining whether there are reasonable grounds to believe that an individual is a victim of human trafficking or modern slavery

Types of evidence for Reasonable Grounds decisions

Some examples of specific evidence include:

Indicators of modern slavery: These might include signs of physical or emotional abuse, control over the person's movements, restricted access to food or water, or evidence of forced labour.

Expert reports: These could come from medical professionals, mental health specialists, or other experts who have evaluated the individual and concluded that they are likely a victim of human trafficking or modern slavery.

Travel records: If there is evidence that the individual has travelled to a country where modern slavery is prevalent, or that they have been moved from one location to another against their will, this could be considered as specific evidence.

Witness statements: If there are independent witnesses who can corroborate the individual's account of being exploited or trafficked, this can be very powerful evidence.

Information provided by the first responder: If the person who referred the individual has provided additional evidence or information that supports the individual's claim of being a victim of human trafficking or modern slavery, this can also be considered.

Views of trusted third parties: Social services, guardianship services, and other trusted third parties may have information that supports the individual's claim of being a victim of human trafficking or modern slavery.



The Victims Journey



The Victim journey

Key points

- First Responder Organisations refer cases of potential victims to the NRM
- The relevant competent authority will make a Reasonable Grounds decision within 5 working days of referral to determine if the individual is a potential victim of modern slavery
- If the Reasonable Grounds decision is positive, the individual will receive a Recovery Period of at least 30 calendar days and will be able to receive support
- A Conclusive Grounds decision will be made at least 30 calendar days after the Reasonable Grounds decision to determine if the individual is a victim of modern slavery

Identification and Referral:

- First responders have a responsibility to identify and refer potential victims to the NRM
- A triage process is followed by the SCA to determine which competent authority will progress the case
- Consent must be sought from adult victims before making a referral
- Immediate safety concerns may require emergency accommodation

Reasonable Grounds Decision:

- The relevant competent authority must decide whether there are reasonable grounds to believe that a person is a victim of modern slavery
- The decision should be made within 5 working days of referral to the NRM.
- Following a positive decision, an adult victim is entitled to support as set out in the Support for Adult Victims section

Recovery Period:

- Following a positive Reasonable Grounds decision, a victim will receive a Recovery Period of at least 30 calendar days
- The Recovery Period will not be observed if a public order or bad faith disqualification has been applied, or if it is decided that an additional recovery period is not appropriate
- If a victim receives a negative Reasonable Grounds decision, they will not enter MSVCC support

Conclusive Grounds Decision:

- The relevant competent authority must make a Conclusive Grounds decision based on sufficient information about the case
- The decision should generally be made as soon as possible, but may take significantly longer in some cases
- The threshold for the Conclusive Grounds decision is whether, 'on the balance of probabilities', there are sufficient grounds to decide that the individual is a victim of human trafficking or slavery, servitude, and forced or compulsory labour.
- Following a positive decision, victims will receive at least 45 calendar days of support during the move-on period

Reconsideration:

- In some situations, someone may request a reconsideration of a Reasonable Grounds or Conclusive Grounds decision where there is additional evidence that may impact the decision, or they believe the decision is not in line with published guidance.

Key points

- Adult victims referred to the National Referral Mechanism (NRM) can access Government-funded support through the Modern Slavery Victim Care Contract, which includes accommodation, material assistance, financial support, translation and interpretation services, information and advice
- Outreach support may be provided to adult victims who are already in safe, secure and appropriate accommodation, such as local authority or asylum accommodation
- Adult victims may also be eligible for legal aid for immigration advice, medical care, counselling, and assistance to return to their home country if they are not UK nationals

Support for adult victims

Prioritising Safety

- The safety of potential and confirmed victims of modern slavery should always come first
- First Responders should take appropriate steps to ensure the safety of the individual, such as providing emergency accommodation or contacting the police when necessary

Support for Adults at Risk

- Local Authorities have a responsibility to provide emergency support to adults at risk as defined in the Care Act 2014
- Long-term support should also be offered to adults at risk

Support Services

- Support for potential and confirmed victims can be provided by a range of organisations, including government and non-government agencies
- Specialist support is accessed by completing a National Referral Mechanism referral

Modern Slavery Victim Care Contract

- The Modern Slavery Victim Care Contract is designed to provide temporary support for victims of modern slavery
- The Contract's role is to provide information, signposting, and facilitate access to statutory and non-statutory services
- Risk and needs assessments are conducted at various points in a victim's journey to identify necessary support

Risk and Needs Assessments

- Various assessments are conducted to identify risk and needs at different points in a victim's journey

Key points

- Each potential victim or victim in the Recovery and/or Move-On Period will have a personalised journey plan tailored to their needs and circumstances
- The journey plan is a living document that is mutually agreed upon between the support worker and the potential victim or victim and is regularly reviewed and updated
- A period of move-on support follows a conclusive determination by the relevant competent authority that the individual is or is not recognised as a victim
- The aim of the move-on period is to allow victims to plan their exit from the service, including link up with relevant services for their transition
- Reach-in support is a post-NRM service that offers transitional support to confirmed victims, once they have exited the main Modern Slavery Victim Care Contract support service
- Confirmed victims can self-present to access post-exit reach-in support as required or can be referred to the service by any professional

Journey plan

Journey Plan:

- Each victim will have a personalised journey plan, tailored to their needs and circumstances, informed by the Needs-Based Assessment and developed through interaction with a support worker
- The objective of the journey plan is to provide support tailored to the individual needs of each victim and ensure that the support continues to meet needs arising from exploitation
- The journey plan is a living document that is regularly reviewed and updated to reflect changes in circumstances and/or new goals or aspirations

Move-On Period:

- Victims receive a guaranteed minimum of 45 calendar days of move-on support from receipt of their positive Conclusive Grounds decision to help them transition out of Modern Slavery Victim Care Contract support
- Those not recognised as victims receive nine working days of move-on support following their negative Conclusive Grounds decision
- Annex F sets out the full range of support available to adult potential victims, including through the Modern Slavery Victim Care Contract
- Reach-in support is a post-NRM service that offers transitional support to confirmed victims, once they have exited the main Modern Slavery Victim Care Contract support service

Re-entry to the Main MSVCC Support Service:

- Victims with a positive Conclusive Grounds decision, who have exited the main MSVCC support service, are eligible to be considered for re-entry to MSVCC support, through self-referral

Key points

- Referrals for child victims of modern slavery are handled by the SCA
- Local authorities are responsible for providing support to child victims of modern slavery, regardless of their nationality or immigration status
- Relevant child protection procedures must be followed if modern slavery is suspected
- Local safeguarding partners, including local authorities, police, and clinical commissioning groups, have a duty to work together to safeguard and promote the welfare of children, including child victims of modern slavery
- Independent Child Trafficking Guardians (ICTGs) in England and Wales are an independent source of advice and advocacy for trafficked children, and are available in two-thirds of local authorities

Cases already known to children's or adult services

- If a Sandwell Local Authority social worker has a concern around modern slavery for the child they should discuss the case with the Horizons team
- If a Sandwell local authority social worker has a concern around modern slavery for an adult, they should discuss the case with SHOP (modern_slavery@sandwell.gov.uk)

Supporting child victims of modern slavery

Multi-agency working:

- A cohesive multi-agency approach is necessary to safeguard and protect the welfare of children, including child victims of modern slavery
- Relevant agencies must act in accordance with the arrangements and contribute to whatever actions are needed to safeguard and promote the child's welfare

Development of local protocols for child victims:

- Local inter-agency protocols can guide action where there are concerns that a child is a victim of modern slavery
- The identification of a child who is a potential victim of modern slavery should always trigger the agreed local child protection procedures

Presumption of Age:

- Where there are reasonable grounds to believe a person is a victim of modern slavery, and it is not certain but there are reasonable grounds to believe that the person may be under 18, then the person is to be treated as being under 18 years of age
- In the event of a challenge to the age assessment decision, the child would continue to receive the support of an Independent Child Trafficking Guardian (ICTG) until a final determination has been made

Safeguarding Children:

- Local Authorities are the primary service provider for safeguarding and responding to the needs of a child victim of modern slavery.
- First Responders and other frontline staff should refer a child to the Local Authority if it is suspected, or there are concerns that they are a victim of modern slavery

Key points

- Victims of modern slavery may experience trauma that can impact their ability to disclose information or recall facts.
- Professionals working with victims should take a trauma-informed approach that recognises the harmful effects of trauma and emphasises compassion and respect.
- The Trauma-Informed Code of Conduct for All Professionals Working with Survivors of Human Trafficking and Slavery (TiCC) by Rachel Witkin and Dr Katy Robjant, published by the Helen Bamber Foundation is designed to enable professionals in all fields of discipline, and in any working context to:
 - Establish and maintain a mutual relationship of trust with victims in any working context or environment
 - Impart a consistent sense of calm, security and safety throughout the course of their work
 - Increase the confidence of victims and minimise the risks of causing distress and re-traumatisation

Trauma informed practice

- Victims of modern slavery may experience post-traumatic stress disorder (PTSD)
- PTSD can result in intrusive thoughts, flashbacks, nightmares, and avoidance of trauma triggers
- Negative beliefs about self-blame, guilt, shame, and fear of others may affect victims' ability to provide an accurate account of their history
- Alterations in arousal and reactivity may cause victims to be hypervigilant, irritable, or aggressive, especially when interrupted during a flashback
- Victims of modern slavery are more likely to experience complex PTSD if they have endured multiple and repeated trauma over long periods, especially during childhood

Here are the key points for Interviewing people who have experienced trauma:

Interviewers should be aware of the impact of trauma on the interviewee when interviewing a victim or potential victim of modern slavery

Victims of modern slavery should be interviewed in a way that avoids re-traumatising them, and interviewers must not make negative assumptions if a victim cannot recount details of their experience

Traffickers and exploiters may provide stories for victims to tell if approached by the authorities, leading to errors, omissions, and inconsistencies in their accounts

The impact of trauma can lead to delayed disclosure or difficulty recalling facts, which may affect a victim's credibility

Victims may have problems with direct interviewing, especially in contexts that seem adversarial

Key points

Good practice should be followed during interviews with potential victims of modern slavery which includes:

- The interview should be arranged at a time when reasonable travel arrangements can be made to attend
- If police are interviewing a potential victim or victim of modern slavery, the interview should be carried out by a police officer who is Achieving Best Evidence in Criminal Proceedings trained
- Evidence from witnesses in criminal trials must be given independently by the witness.
- Support offered via the NRM does not depend on co-operation in a criminal trial
- Staff working with victims should make it clear that the NRM process and criminal trial process are separate
- Any form of inducement might undermine the credibility of evidence obtained and adversely affect the prosecution's ability to bring cases to court

Good practice during interviews

key points regarding the presence of a support worker, the presence of others in interviews, working with interpreters, and the presence of children in interviews:

If the victim has a support worker, the interviewer should discuss any recommendations with them and offer the option to have the support worker present during the interview.

However, the support worker should not assist the victim in answering questions.

Interviews with potential victims should not be conducted in the presence of anyone who may be involved in their exploitation, as this may inhibit them from providing information.

If other people are present during the interview, interviewers should be alert to the possibility that they are involved in exploitation and try to separate the victim for at least part of the interview.

The identity and credentials of any other individuals attending appointments should be ascertained.

Interviewers must not use anyone who may be involved in the potential victim's exploitation as an interpreter. Professional interpreters should be used, and victims should be given a choice over the gender of their interpreter. Interpreters should never be left alone with a victim, and victims and interpreters should leave at different times.

The presence of children in an interview situation can hamper the ability and willingness of potential victims to disclose information about their experiences, so the interview should take place in private. It can also be traumatic for children to be present during an account of traumatic events that have happened to their parents.



Disrupting Modern Slavery

Disruption tactics in Sandwell

The disruption of modern slavery is a critical aspect of combatting human trafficking and exploitation.

If locations of concern are identified in town centres or other locations that feature regularly in exploitation-related incidents, local authorities, police, and appropriate partners should work together to develop a joint action plan.

Closure notices and orders: The local authority's SPoC should work closely with the police to gather evidence of anti-social behaviour or criminal activity taking place on the premises and apply for a closure notice or order where appropriate. This may involve liaising with Trading Standards and licensing authorities, as well as reviewing CCTV and conducting covert observations.

Reviews of licensed premises: The local authority's licensing team should conduct regular reviews of licensed premises to ensure compliance with relevant legislation, such as the Licensing Act 2003. This may involve working closely with the police and other agencies to gather evidence of exploitation or trafficking activity taking place on the premises and taking appropriate action where necessary.

Warrants: The police may apply for a warrant to enter and search a property where there is reasonable suspicion that criminal activity is taking place, such as the exploitation or trafficking of vulnerable individuals. The local authority's SPoC should work closely with the police to support these efforts and provide any relevant intelligence or information.

Slavery and trafficking risk orders (STROs): The local authority's SPoC should work closely with the police to gather evidence of exploitation or trafficking activity and apply for an STRO where appropriate. This may involve liaising with Trading Standards and licensing authorities, as well as conducting outreach work and obtaining payment details used by perpetrators.

Slavery and trafficking prevention orders (STPOs): The local authority's SPoC should work closely with the police to gather evidence of exploitation or trafficking activity and apply for an STPO where appropriate. This may involve liaising with Trading Standards and licensing authorities, as well as conducting outreach work and obtaining payment details used by perpetrators.

Sexual risk orders (SROs) and sexual harm prevention orders (SHPOs): The police may apply for an SRO or SHPO to restrict the activities of individuals who pose a risk of sexual harm. The local authority's SPoC should work closely with the police to support these efforts and provide any relevant intelligence or information.

Criminal behaviour orders (CBOs): The police may apply for a CBO to restrict the activities of individuals who have engaged in criminal behaviour. The local authority's SPoC should work closely with the police to support these efforts and provide any relevant intelligence or information.

Community protection notice (CPN): The local authority's SPoC should work closely with the police to gather evidence of anti-social behaviour or criminal activity taking place in a community and issue a CPN where appropriate. This may involve liaising with Trading Standards and licensing authorities, as well as conducting outreach work and obtaining payment details used by perpetrators.

Cease and desist order: The local authority's SPoC should work closely with the police to gather evidence of landlords renting out their property for criminal or anti-social behaviour and issue a cease-and-desist order where appropriate. This may involve liaising with Trading Standards and licensing authorities.