



Home Office

Review of the National Referral Mechanism for victims of human trafficking

November 2014

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1. Preface

The topic of human trafficking creates strong feelings in people; it also generates potent commitment from those working in this complex field. That is what stood out for me in this review, the commitment across sectors, organisations, disciplines and generations. Everyone wants to erase the evil of trafficking in people. Everyone wants to see victims regain control of their own lives and yet there are passionate differences of opinion as to how to achieve that goal. This review seeks to set out a path we can tread towards achieving that goal. What is clear to me is that, in considering systems, rules, support mechanisms and the rest, the critical issue is that people working within organisations and agencies develop a collaborative culture which focuses on victims; who are first and foremost people. They are also diverse, opinionated and have a wide variety of needs and wants. The phrase, to which the review team returned over and over, is 'no one size fits all'.

Since its introduction in 2009 the National Referral Mechanism has grown somewhat wildly over time. It is now a complex system operating in a challenging and painful area of public life which is, in the main, hidden from view. It is a difficult system to grip because our natural reaction is to shy away from the atrocities, and disbelief provides a powerful defence against the anxieties these raise. Many level criticism at the current system and we have found that it does need to change. Given its original design was based on a set of untested assumptions made nearly seven years ago, that is no surprise.

This review has been a strong team effort, and we have depended on people from many backgrounds and settings. Whilst the core has been mainly Home Office based, we have relied heavily on many others from across the United Kingdom to provide evidence, passion, data, experience and challenge.

Jeremy Oppenheim
Nov 2014

2. Executive Summary and Recommendations

2.1 Summary

- 2.1.1 The National Referral Mechanism Review was commissioned by the Home Secretary in April 2014 as part of the Government's wider commitment to eradicate slavery and protect victims. The Review's starting point has been the victim and their experiences; the lens we have used has been focused on them. We have been enormously helped by a wide range of practitioners, Parliamentarians, campaigners and crucially victims who have been willing to talk and tell us of their appalling experiences.
- 2.1.2 Between its inception in 2009 and September 2014 approximately 6,800 people were referred to the National Referral Mechanism (known as the NRM). It is a complex mechanism, involving a wide group of dedicated professionals, statutory and voluntary organisations.
- 2.1.3 The Review was asked to examine and make recommendations to the Home Secretary on six key areas:
- identification of victims
 - how they access support
 - the level of support that victims receive
 - decision making
 - governance of the NRM
 - collection and sharing of data
- 2.1.4 In recognition of the specific issues affecting children we have investigated and provided recommendations focused on them and their particular needs.
- 2.1.5 The Review found many areas of good practice; however, we also saw a disjointed system where awareness of human trafficking was often low and of the NRM processes still lower. We heard of the difficulties faced by support providers in moving people on from the support provided under the victim care contract. There were many critics of decision making, the quality and communication of decisions and the ability to manage and share information effectively in the best interest of victims.

2.2 Recommendations

- 2.2.1 The Review found several issues that need to be resolved to ensure that the process of identifying victims is more effective. Identification as a victim of trafficking and subsequent referral to the NRM is dependent on where the victim is found and who they come into contact with. **The review recommends developing, with key partners, a comprehensive awareness strategy leading to increased recognition of human trafficking by the public and professionals.**
- 2.2.2 Support for adults is accessed following referral by a First Responder and a 'Reasonable Grounds' decision taken by a competent authority (UK Human Trafficking Centre, UK Visas and Immigration and Immigration Enforcement). 86% of referrals receive a positive decision at Reasonable Grounds¹. We think that First Responders, with appropriate training and feedback, can refer to the NRM on the basis of the reasonable grounds level "I suspect but cannot prove". Thus the Review recommends **an overhaul of the referral process of the National Referral Mechanism by professionalising the current First Responder role, replacing it with Slavery Safeguarding Leads² and replacing the reasonable grounds decision with an alternative referral mechanism once the successful implementation of accredited Slavery Safeguarding Leads has occurred.**
- 2.2.3 The level of support to victims has been much debated. Support is not intended to provide rehabilitation, which could take many years. It is to allow the person to begin to recover and to go on to rebuild their lives following 45 days of reflection and recovery. The review has not made recommendations on the varying methods of support; however there are some issues within the system that should be looked at. The review recommends **providing support based on an assessment of the individual needs of the victim. Consideration should be given to entry and exit timescales, support following conclusive identification, and the audit and inspection of support provision.**
- 2.2.4 The area of decision-making has provoked much debate within the sector. We have heard of concerns over the conflation of human trafficking decisions with asylum decisions, elongated timeframes for decisions, lack of shared responsibility and provision of relevant information for decision-making, the complexity of the system and the thresholds for decision-making. The review recommends **a process of conclusive identification of trafficking victims**

¹ 74% NRM data 2013 (as of 08/09/14) and 85-90% based on NRM data January-March 2014

² The name of these leads may differ in the devolved administrations

through regional multi-disciplinary panels should be tested with a view to ceasing the sole decision-making roles of UK Visas and Immigration and UK Human Trafficking Centre and Immigration Enforcement.

- 2.2.5 Although the National Referral Mechanism is managed and funded by the Home Office, the system is fragmented and there is no one body responsible for governance. Several issues have been highlighted including the independence of the NRM from the Home Office and UK Visas and Immigration, a desire to place the NRM on a statutory footing and the absence of a formal appeals system. A multi-disciplinary, decision-making panel as suggested above, in which local representatives take responsibility for the decisions of the panel, should reduce the need for challenge, as would a strong system of governance. The review recommends **a single management process for trafficking cases should be put in place and accountability for this system should lie with the Home Office.**
- 2.2.6 The current data collecting and collating provision does not support effective identification of victims, assist with prosecutions or support the production of meaningful management information on how the process is working from end to the end. What does exist is difficult to manage and unreliable. The review recommends **improving the collection and collation of data in order to facilitate the progression of cases and the management of the system and to contribute to intelligence.**
- 2.2.7 The report includes some additional recommendations specifically for child victims of trafficking. These recommendations relate to England and Wales; they will need amending to reflect the child protection systems, structures, processes and timelines in Scotland and Northern Ireland. Recommendations are focused around improving awareness of the indicators of trafficking and the additional safeguarding that is recommended for child victims. The review also recommends that the various child protection timelines are taken into account.



3. Context

3.1 Introduction

- 3.1.1 The National Referral Mechanism Review was commissioned by the Home Secretary in April 2014. The Home Secretary asked senior civil servant Jeremy Oppenheim to lead the work as part of the Government's wider commitment to eradicate slavery and protect victims through legislative and non-legislative work. The introduction of a Modern Slavery Bill³, the first of its kind in Europe, will further strengthen law enforcement efforts, increase convictions and better protect victims.
- 3.1.2 The Review was asked to examine whether the National Referral Mechanism provides an effective and efficient means of supporting and identifying potential victims of human trafficking and whether it can, or should, cover all victims of Modern Slavery.

3.2 Background

- 3.2.1 The National Referral Mechanism (known as the NRM) is the process by which people who may have been trafficked are identified, referred, assessed and supported by the Government of the United Kingdom. The process, set up in 2009 following the signing of the Council of Europe Convention on Action against Trafficking in Human Beings (2005) (the trafficking convention), has matured during the subsequent years; as at 30 September 2014 approximately 6,800 people had been referred into the National Referral Mechanism since its establishment.
- 3.2.2 The mechanism is intricate and handles a range of people with a wide variety of needs and expectations. It is not in fact a single system but comprises a large group of dedicated people, professionals, immigration staff, police and others working alongside a vibrant and passionate voluntary sector. It has different

³ In March 2014 the Scottish Government announced that it would bring forward bespoke human trafficking legislation.

A Human Trafficking and Exploitation (Further Provisions and Support for Victims) Bill is progressing through the Northern Ireland Assembly.

approaches across the UK with the devolved administrations having developed a variety of support systems for those thought to have been trafficked.

- 3.2.3 For many years stakeholders and Non-Governmental Organisations have requested changes to the National Referral Mechanism. Various publications have sought to provide evidence of the need for change, one of these is the Anti-Trafficking Monitoring Group's document 'Wrong kind of victim'.

The Review was asked to consider six main areas:

- Identification - identification of potential victims
- Access to support – victim access to support through the National Referral Mechanism
- Level of support - the level of support provided
- Decision-making - the current decision-making process, including the quality and consistency of decision-making
- Governance - oversight, accountability and who is best placed to administer the system
- Data - victim data collection and data sharing between relevant agencies

- 3.2.4 The Review's starting point has been the victim and their experiences; the lens we have used has been focused on them. We have been enormously helped by a wide range of practitioners including the police, local authorities and Non-Governmental Organisations, Parliamentarians, campaigners and victims. We consulted over one hundred organisations, received written evidence, and visited safe houses to understand the reality both for the victims and those working closely with them. We met with representatives from around the UK; and we have attended events to publicise the review and invite comments. A list of those with whom we have engaged is at annex A.

- 3.2.5 We have been particularly interested in the roles of the devolved administrations and the insight they bring to trafficking. The team has visited a range of organisations and public bodies in Scotland, Northern Ireland and Wales where some exemplars of best practice have been identified.

- 3.2.6 The team also reviewed the written material produced by a wide range of organisations, including those produced for the Joint Committee on Modern Slavery.

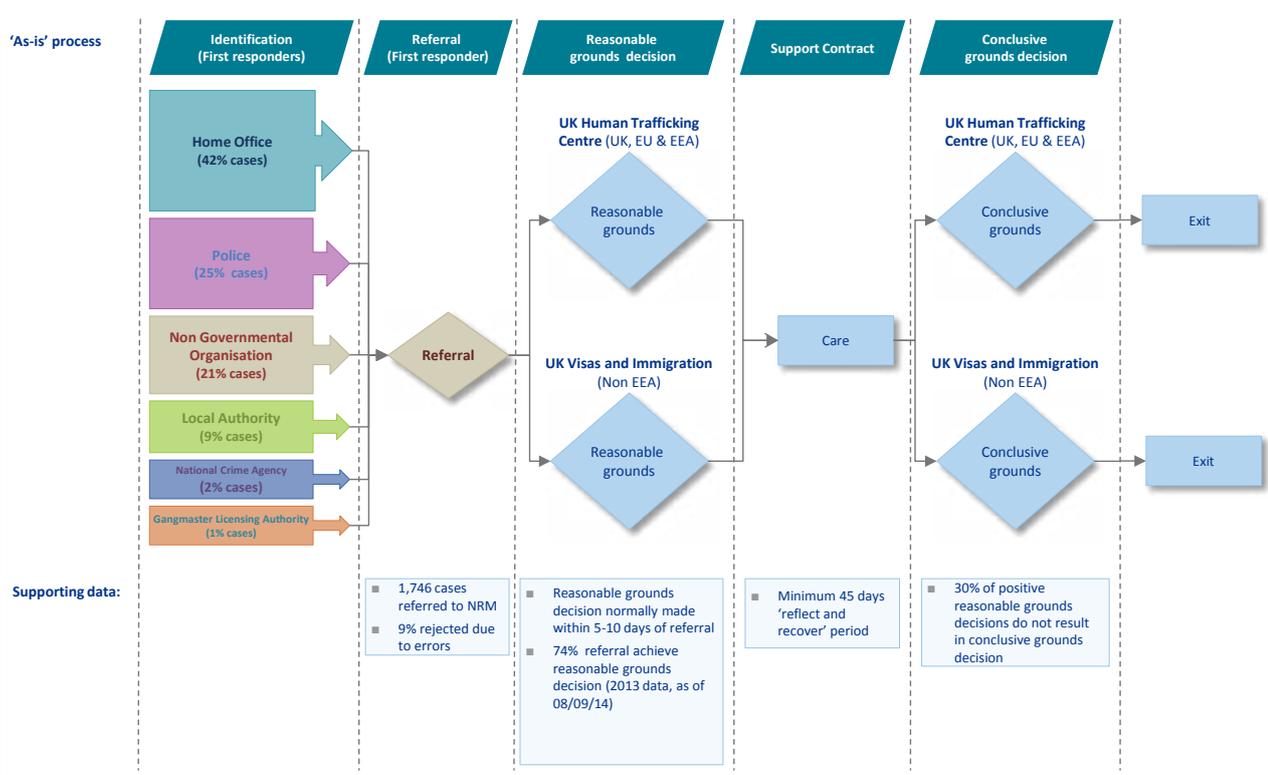
- 3.2.7 Conscious of the need to gain the views and insights from stakeholders across the whole system, the Review hosted four themed workshops⁴.

⁴ Covering children, case studies, first responders and decision-making.

3.3 Overview of current system

3.3.1 The National Referral Mechanism is the process which was set up to comply with the Council of Europe Convention on Action against Trafficking in Human Beings⁵ and specifically:

- Article 10 – Identification of the victims
- Article 12 – Assistance to victims
- Article 13 – Recovery and reflection period
- Article 16 – Repatriation and return of victims



3.3.2 The current process is shown and includes three decision points:

3.3.3 **Referral:** a decision to refer a person into the National Referral Mechanism. This decision is made by a First Responder⁶.

3.3.4 **Reasonable Grounds:** a decision by a 'Competent Authority', of which there are currently three: the UK Human Trafficking Centre, UK Visas and Immigration and, in a very small number of criminal cases, Immigration Enforcement. The Competent Authority decides if there are reasonable grounds to believe that the

⁵ And the subsequent Council of Europe Convention on Action against Trafficking in Human Beings Explanatory Notes

⁶ The First Responder may be a police or immigration officer, social worker, other government official or someone working for a support organisation or other Non-Governmental Organisation.

person referred may be a victim of trafficking, using the “suspect but cannot prove” test.

- 3.3.5 **Conclusive Grounds:** a balance of probabilities decision that there is sufficient information to decide that the person is a victim of trafficking. This decision is taken by the relevant Competent Authority⁷.
- 3.3.6 The trafficking convention is framed around the identification of victims so that they can be given the benefit of the measures to protect and promote their rights⁸. It is recognised that the identification process is one which can take time, from first considering there are reasonable grounds to believe a person is a victim of trafficking through to completion of the identification process which establishes, on the balance of probabilities, whether or not the person is a victim of trafficking.
- 3.3.7 During this period of identification a victim is entitled to assistance - a reflection and recovery period of 30 days as a minimum (45 days is applied in the UK) or until the identification process is complete⁹.
- 3.3.8 Following conclusive identification of a person as a victim of trafficking there is a number of possibilities for victims.

UK citizen/EU/EEA nationals (limited rights)	Non-EEA nationals with existing or new immigration status	Non-EEA nationals with outstanding asylum claim	Non-EEA nationals not granted immigration status
Access to services (health and benefits), labour market, vocational training and education, access to assistance to return home for EU/EEA	Access to services (health and benefits), labour market, vocational training and education, access to assistance to return home	Access to healthcare and asylum support, access to assistance to return home	No access to services, access to assistance to return home

Figure 1

⁷ The Competent Authority is UK Human Trafficking Centre for UK and EEA nationals and by UK Visas and Immigration for non-EEA nationals and Immigration Enforcement for criminal cases

⁸ Article 3 – non-discrimination principle in the Council of Europe Convention on Action against Trafficking in human beings: “The implementation of the provisions of this Convention by Parties, in particular the enjoyment of measures to protect and promote the rights of victims, shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.” Chapter 3 of the convention is entitled “Measures to protect and promote the rights of victims”

⁹ Support during this period, in England and Wales, is provided by a support contract currently held by the Salvation Army and which includes a network of sub-contracted safe houses. Scotland has arrangements with Migrant Help and TARA and in Northern Ireland the system is overseen and managed by the Community Safety Unit with the Ministry of Justice and contracts let to Migrant Help and Belfast and Lisburn Woman’s Aid.

- 3.3.9 Assistance provided to victims is not conditional on the victim's willingness to act as a witness and is provided on a consensual and informed basis.
- 3.3.10 The number of people identified as potential victims of human trafficking is comparatively small; the National Crime Agency estimated¹⁰ that, in 2013, there were 2,744 potential victims of human trafficking, and there were 1,746 referrals to the National Referral Mechanism. This compares with 23,507 asylum applications in 2013¹¹ or around 269,000 domestic abuse related crimes between 2012 and 2013¹² in England and Wales.
- 3.3.11 The number of people identified as potential victims of human trafficking has risen year on year, since 2009. The number of referrals between January and March of 2014 (566) was 39% higher than the number of referrals in the same quarter in 2013 (407). The general view is that referrals to the National Referral Mechanism are likely to continue to increase as awareness of Modern Slavery grows.

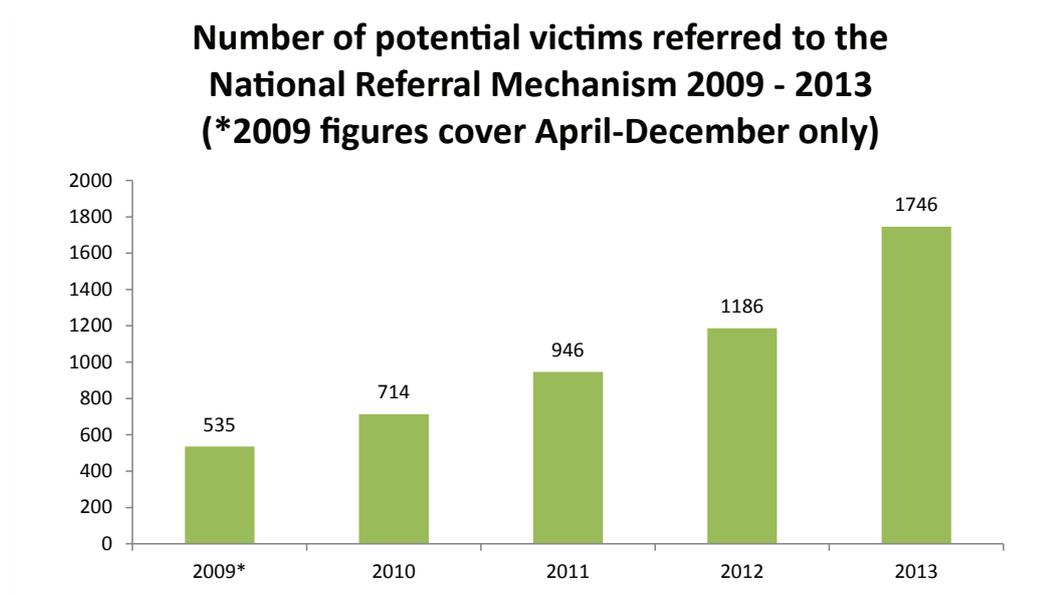


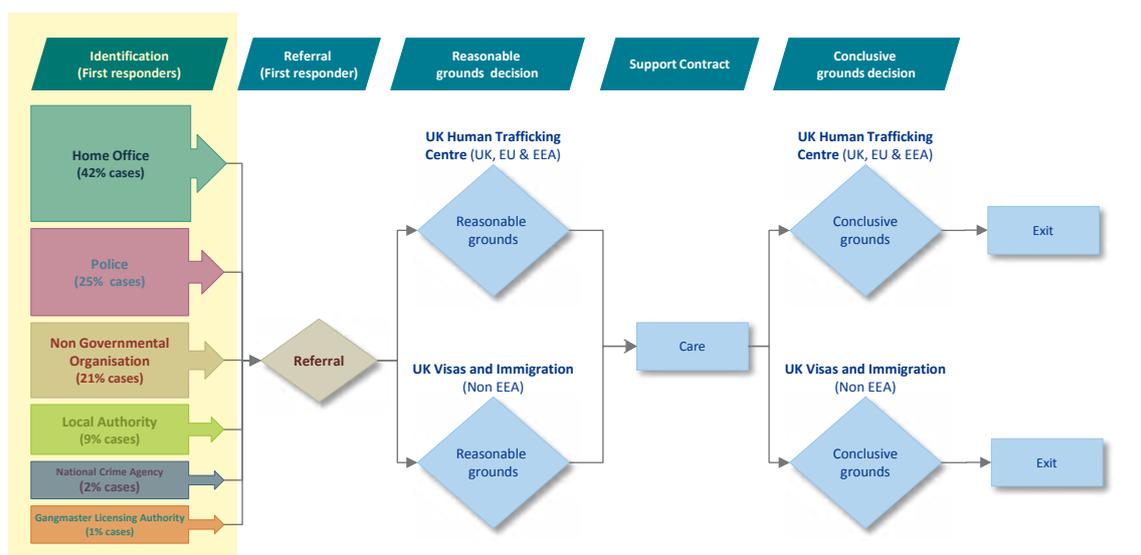
Figure 2

10 National Crime Agency (2013) NCA Strategic Assessment: The Nature and Scale of Human Trafficking in 2013 <http://www.nationalcrimeagency.gov.uk/publications/399-nca-strategic-assessment-the-nature-and-scale-of-human-trafficking-in-2013/file>

11 Immigration Statistics: <https://www.gov.uk/government/publications/immigration-statistics-october-to-december-2013/immigration-statistics-october-to-december-2013>

12 <http://www.justiceinspectors.gov.uk/hmic/wp-content/uploads/2014/04/improving-the-police-response-to-domestic-abuse.pdf>

4. Identification



4.1 Issues

- 4.1.1 Please see 10 for children.
- 4.1.2 Victims can be encountered anytime, anywhere. A victim, having escaped their trafficker, may meet a member of the public, who can notify the police, call the Modern Slavery helpline or the support contractor helpline¹³. Alternatively, they may approach a local authority for accommodation, or claim asylum and be identified during the asylum assessment process. A victim may be found directly in their situation of exploitation; exhibit the signs of trafficking to a Border Force officer when seeking entry to the UK; or be a child who, over time and as trust is built, reveals exploitation to their social worker or carers.

“It is a travesty that any potential victim of modern slavery may lose the opportunity for assistance simply because the authorities with whom they come into contact do not know what provision is available or how to access it.”

CSJ report - It happens here

¹³ Scotland and Northern Ireland both have their own separate helplines run by support contractors.

4.2 Findings

- 4.2.1 We have heard from many people that awareness of the National Referral Mechanism and trafficking is less well established than it should be amongst frontline staff. Far too often a victim is dependent on whom they meet, how well trained those people might be and where in the UK they are.
- 4.2.2 There is evidence that staff employed by public bodies may not recognise victims when they encounter them or may not refer them into the National Referral Mechanism. The countrywide figures on trafficking indicate that some areas produce a strong flow of referrals; others disarmingly few¹⁴.
- 4.2.3 Stakeholders consulted from across the system agree that victims may be seen in terms of their other needs. For example a social worker may see an unaccompanied child primarily as a victim of sexual exploitation rather than a victim of trafficking, an immigration enforcement officer may see an illegal worker and a police officer may see an offender.
- 4.2.4 There are some good examples of collaborative working: Unseen, a Bristol based charity, which works on the prevention of trafficking and with survivors, told us of the proactive work they do to identify victims and their work with the police to provide support to victims when initially identified. Avon and Somerset police (covering the Bristol area) referred 22 potential victims to the National Referral Mechanism in 2013. In Cambridgeshire, there is a joint working operation between those within the local authority, the police and Gangmaster Licensing Authority to identify victims through awareness of profiles of trafficking victims. Cambridgeshire referred 43 potential victims to the National Referral Mechanism in 2013.
- 4.2.5 However, whilst these are examples of effective joint working, it is clear that there is an inconsistent approach to the proactive work by both public bodies and Non-Governmental Organisations to searching for and finding victims of trafficking.

¹⁴ For example, in 2013, nine police forces in England and Wales did not refer any potential victims to the NRM and seven police forces only referred one potential victim per force. 28 police forces referred 1% or less of total police force referrals.

Identification



4.2.6 There is a plethora of identification tools being developed by many involved in trafficking support. A simple check list or traffic light approach that can be easily deployed and understood would benefit professionals and victims alike. Many organisations have their own checklists that they display on their websites. The Northern Ireland Department of Justice has produced a mouse mat which gives the signs of human trafficking and contact numbers, reproduced here.

Human Trafficking can affect **anyone**, of any age, gender or nationality.

KNOW THE SIGNS:

<p>Is someone:</p> <ul style="list-style-type: none"> • Working against their will? • Having their movements controlled? • Subject to violence or threats? • Distrustful of authorities? • Unable to communicate freely with others? • Unsure of where they are? • Not intergrated with the local community? 	<p>Do they appear to:</p> <ul style="list-style-type: none"> • have little or no time off? • Live in overcrowded accommodation? • Have bruises or unexplained injuries? • Be subject to security at their accomodation or work premises? • Have no access to their earnings? • Work excessive hours • Be in a situation of dependence?
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These are just some of the indicators that someone may have been trafficked. You can find more signs by searching for human trafficking at: www.nidirect.gov.uk

If you have suspicions, report them to the PSNI on 999 or anonymously to Crimestoppers on 0800 555 111. You can also contact the Migrant Help 24/7 referral line on 077 6666 8781.

4.2.7 A consistent and agreed group of indicators used by all is crucial to ensuring a dependable and coherent approach.

4.2.8 Overall, the number of potential victims referred to the National Referral Mechanism seems low given what we know about human trafficking, thus suggesting there needs to be a greater awareness of the crime of trafficking. The Home Office launched a campaign, which ran until the end of October 2014, to increase awareness with the public that slavery exists in the UK, inform people of the signs to spot and encourage the reporting of slavery via the new helpline and website. The Modern Slavery Bill proposes to place a duty on specified public authorities to notify the National Crime Agency of those whom they believe to be victims of modern slavery. This includes basic details of those who wish to remain anonymous and those who do not want assistance; this, alongside the current communications plan, will be part of the solution to this problem.

4.2.9 Once identified, potential victims may not consent to entering the National Referral Mechanism¹⁵ for various reasons. The Review has heard anecdotal evidence as to the reasons why victims do not consent to be referred to the National Referral Mechanism. Victims may experience conditioning by their traffickers which can in some cases result in:

¹⁵ This is not the case for children who do not need to give consent.

- victims not appreciating that they are victims
- victims being too afraid of involving the ‘authorities’
- victims fearing traffickers and possible repercussions

4.2.10 In 2013, the National Crime Agency strategic assessment identified 1,649 potential victims of human trafficking who had not entered the National Referral Mechanism¹⁶, but it is likely that this is only a small fraction of those victims who were encountered but not recognised or referred. A senior official at a major port has said that under half of the people that his staff suspect are victims of trafficking will consent to referral to the National Referral Mechanism. Whilst we are aware there are victims who have been identified and not referred or not consented to referral, there is no consistent approach across the UK for recording these instances and thus no clear picture of the scale of this issue.

4.3 Options

4.3.1 Awareness and identification are not static. Running one campaign, one training course, is likely to have impact but only for a limited period. We believe there is no one ‘right’ approach to raising and maintaining awareness that leads to reliable and consistent identification. We have seen a number of approaches in other countries, focused on particular groups (i.e. taxi drivers, hotel reception staff, airline staff). All may have their time and place.

4.3.2 One place where victims often have an opportunity to escape traffickers is when accessing health care. Traffickers may take victims to abortion clinics or to Accident and Emergency if they are injured whilst being exploited. Victims in their accounts of escape, tell of using an opportunity afforded to them by accessing essential health care. Better training on indicators for health care workers could result in the provision of support to these victims at this crucial time.

4.3.3 Immigration Enforcement officers and others involved in the inspection of premises should be encouraged to identify potential victims of trafficking particularly when they enter multi-occupancy housing and work premises. Immigration Enforcement officers may arrest immigration offenders who show no signs that they are victims of trafficking but who may have been smuggled into the UK and be working in conditions which breach employment law but are not such as to constitute trafficking.

¹⁶ National Crime Agency (2013) NCA Strategic Assessment: The Nature and Scale of Human Trafficking in 2013 <http://www.nationalcrimeagency.gov.uk/publications/399-nca-strategic-assessment-the-nature-and-scale-of-human-trafficking-in-2013/file>

4.3.4 In these situations it would be helpful for Immigration Enforcement to document their findings at the time of meeting the person so that these can be referred to should the person later say that they have been trafficked.

4.3.5 Various Non-Governmental Organisations run training courses aimed at front line professionals, but there is no system for approval or standardisation of training. Training is generally not compulsory but reliant on local priorities. Exemplars of good practice include:

- Training and awareness-raising within secondary schools and hospitals in the devolved administrations
- Border Force have trained staff at London Heathrow and are rolling out learning and development

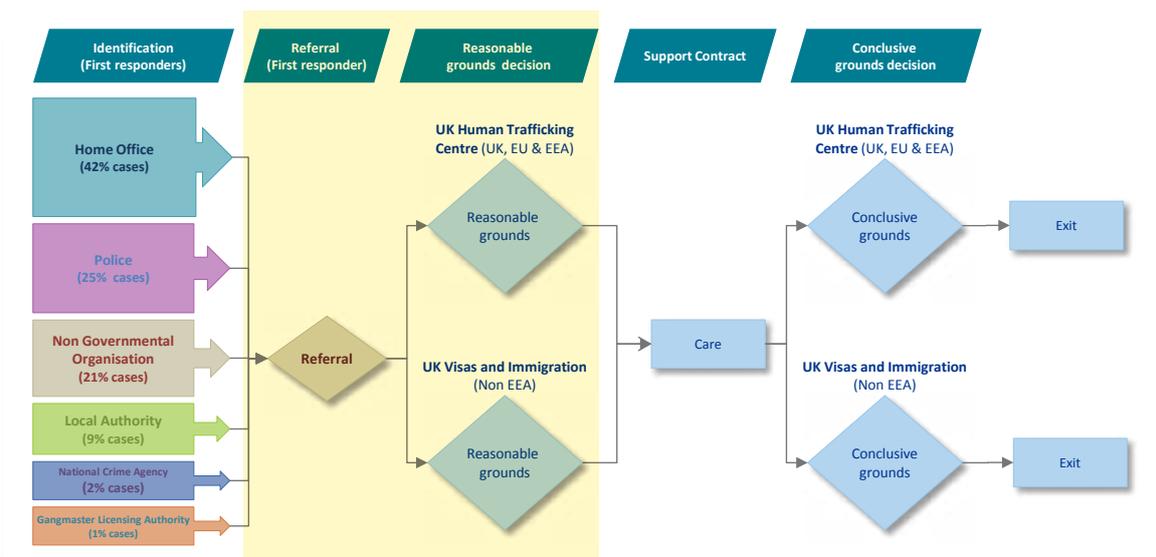
4.4.1 **The Home Office should develop with key partners, a comprehensive awareness strategy** that encompasses:

4.4.2 Targeted awareness-raising campaigns for the public, government and third sector workers with a regularly changing focus which targets the groups most likely to meet trafficking victims including cab drivers, postal workers, hotel staff.

4.4.3 A checklist of trafficking indicators, to accompany campaigns, to support workers in identifying potential victims of trafficking.



5. Access to Support



5.1 Issues

- 5.1.1 Following identification, the First Responder makes the decision to refer a potential victim of trafficking into the National Referral Mechanism. Currently many public bodies are First Responders, but training and awareness is patchy. Non-Governmental Organisation First Responders are appointed through a National Referral Mechanism oversight group chaired by the Modern Slavery Unit at the Home Office.
- 5.1.2 We believe the term First Responder is a misnomer; the role is to act as a lynchpin between communities, front line workers in voluntary sector organisations, hospitals, police, social services and many others and the National Referral Mechanism itself. The quality of the information provided and assessment made by the First Responders is critical in supporting high quality decisions further on in the process.
- 5.1.3 When a potential victim is seen by a First Responder, between them they complete a referral form. The form is firstly a series of tick boxes followed by space for more detail; as much information should be given about the potential victim and their circumstances as possible, fully detailing the reasons for the referral and circumstances in which the person was identified and adding any

additional indicators of human trafficking not listed on the form. Ticking boxes alone does not provide sufficient information for a reasonable grounds decision and further information is generally required to support the Competent Authority to make a trafficking decision.

- 5.1.4 First Responders are required to obtain the victim's consent for referral¹⁷. The First Responder should explain the form and the information on it to the adult victim which the victim then signs. If a victim does not indicate consent with a signature on the referral form, the referral cannot be considered. The First Responder sends the form to the UK Human Trafficking Centre which logs the form and forwards it to the appropriate Competent Authority¹⁸ for a reasonable grounds decision.
- 5.1.5 If the victim is destitute the decision to refer results in the victim being eligible for initial support from the service provider including accommodation. Victims who are not destitute are required to wait until a positive reasonable grounds decision is made before receiving any support.
- 5.1.6 The Competent Authority applies a 'reasonable grounds' test to decide whether a person is likely to be a victim of trafficking. The 'reasonable grounds' test is a relatively low threshold¹⁹. This decision is normally made within 5 to 10 days of referral²⁰.
- 5.1.7 If a potential victim receives a positive decision they will be eligible for support and accommodation if required and eligible to register with a GP and receive NHS care. They may be eligible for legal aid. The victim will be given a minimum of 45 days to 'reflect and recover' and await a conclusive grounds decision. If they receive a negative decision the service provider will help them exit support within 48 hours.

5.2 Findings

- 5.2.1 The Review has heard from First Responders that the referral process is crucial but at present both ill-timed and clumsy as it does not allow for the development of trust and confidence in the First Responder by the victim to support full

¹⁷ Consent is not required for children

¹⁸ UK Visas and Immigration in the case of Non EEA nationals with a current immigration application or the UK Human Trafficking Centre for UK, EU and EEA nationals and to embedded UK Visas and Immigration staff in UK Human Trafficking Centre for non-EEA nationals with valid immigration leave

¹⁹ The test applied is whether the statement "I suspect but cannot prove" the person is a victim of trafficking is true and whether a reasonable person would think, having regard to the information in the mind of the decision-maker, there were reasonable grounds to believe the individual concerned had been trafficked. Reasonable suspicion can never be supported on the basis of personal factors alone (e.g. the appearance of the suspected victim) without reliable supporting intelligence or information or some specific behaviour by the person concerned. It should normally be connected to precise and up to date intelligence/information.

²⁰ NRM data 2013 (as of 08/09/14) average 7 days for all decided cases

disclosure. The result is often an incomplete picture of the circumstances surrounding the trafficking and a more difficult task facing the Competent Authority which makes an informed decision on whether the victim has been trafficked.

5.2.2 Victims may not be clear what they have been referred to and do not understand the need for three separate decision points. One victim to whom we spoke said she was unsure what the National Referral Mechanism was and asked if it was “that form I signed”.

5.2.3 We have been made aware of a number of issues with this important gate-keeping role within the process by all stakeholders consulted. These include:

- Role: a lack of clarity on the role of a First Responder, particularly within public bodies where all staff are automatically first responders
- Purpose of National Referral Mechanism: a lack of clarity on the purpose of the National Referral Mechanism and how referral can be of benefit to a victim
- Process: a lack of understanding of the implications of referral or the process which hampers the First Responders’ ability to advise a potential victim on the next steps
- Quality of referral: the quality of referrals is inconsistent; some First Responders provide comprehensive information and others very little to support a decision.

5.2.4 The training and oversight of First Responders is not prescribed and they are not provided with structured feedback on, or any assessment of, their referrals.

“It is a matter of concern for GRETA that a number of persons identified by support organisations were reportedly not referred to the NRM for a variety of reasons, but primarily because they did not see the benefit of being referred or were fearful of the consequences of being brought to the attention of the authorities because of their irregular immigration status.”

GRETA - Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by the United Kingdom

5.2.5 The Review commissioned a detailed analysis of the current process. This analysis highlighted a number of issues with referrals:

- Some referral forms provide only the basic information required. Incorrect or multiple indicators are ticked without any narrative.
- A detailed narrative is not always provided to explain the reason why the First Responder considers the person may be a victim of trafficking.
- 9% (99/1072) of referrals submitted in January-June 2014 were returned to the First Responder because of errors. Forms being submitted unsigned by the potential victim was the most common reason (64%).

- 5.2.6 These issues have an adverse impact on the whole process with:
- referral form errors causing a delay in the time taken for a case to enter the National Referral Mechanism process
 - repeat work occurring for the UK Human Trafficking Centre and First Responders in addressing the errors
 - timeliness and quality of decision-making affected
 - the necessary information not always captured on the referral form to assist the decision-maker in reaching a reasonable grounds decision
- 5.2.7 We heard, from some, that those making referrals to the National Referral Mechanism prefer to give the person the benefit of the doubt as they fear it will ‘reflect badly’ on them if they ‘miss’ a victim of trafficking.
- 5.2.8 Clearly this stage in the process needs tightening.

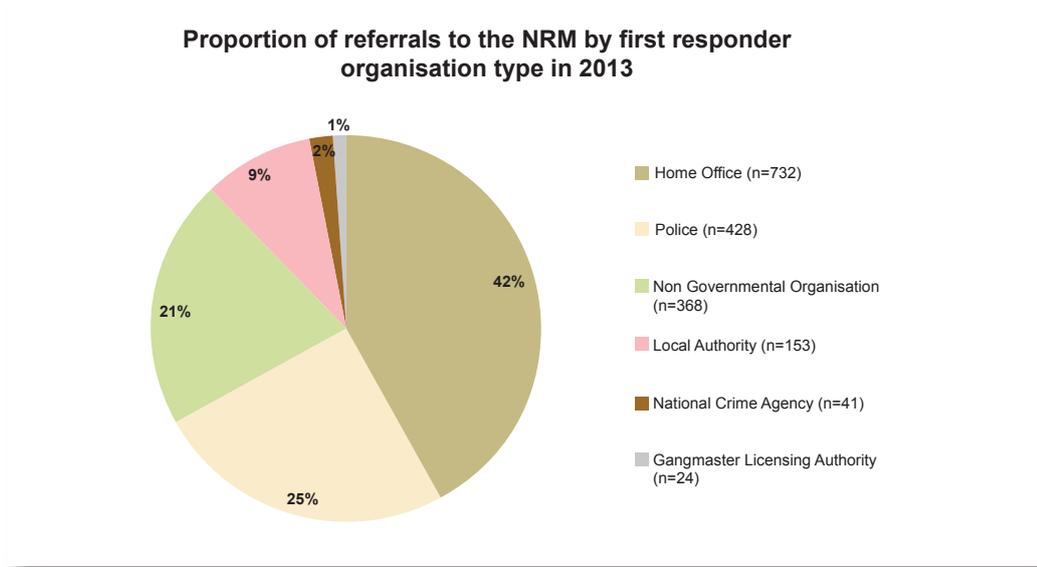


Figure 3

- 5.2.9 Referrals come from several sources. The Police and Home Office are the main First Responders; Home Office referrals are primarily UK Visas and Immigration referring those met at asylum screening or during asylum interviews. Local authority referrals reflect some of the children referred to the National Referral Mechanism.
- 5.2.10 The reasonable grounds decision currently acts as the gateway to services. A high proportion of referrals²¹ received a positive *reasonable* grounds decision. The numbers subsequently receiving positive *conclusive* grounds decisions are lower (45% of all referrals in 2013). This results in provision for victims being

21 74% NRM data 2013 (as of 08/09/14) and 85-90% based on NRM data January-March 2014

available to a significant number of individuals who are deemed, later, not to be victims of trafficking.

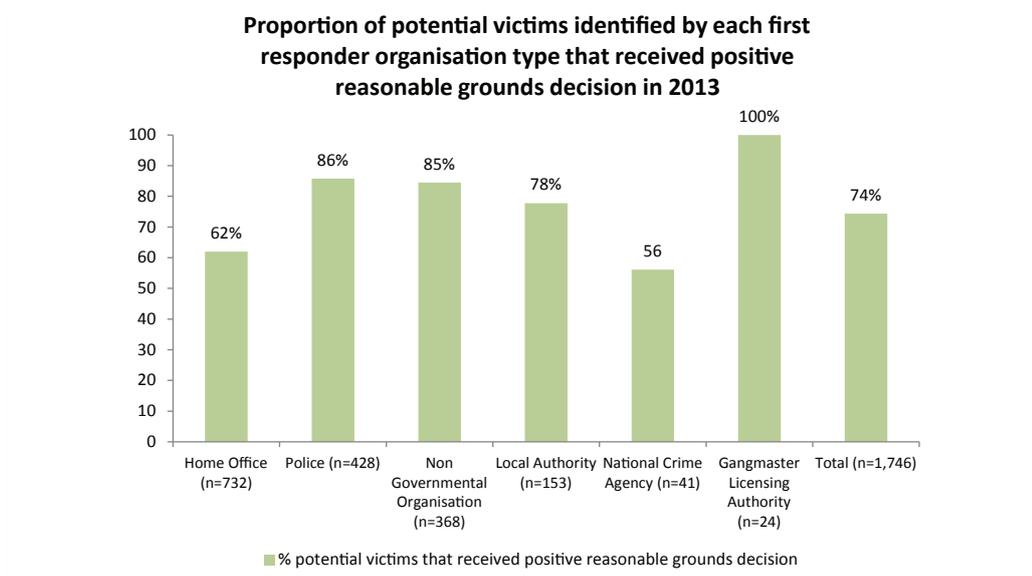


Figure 4

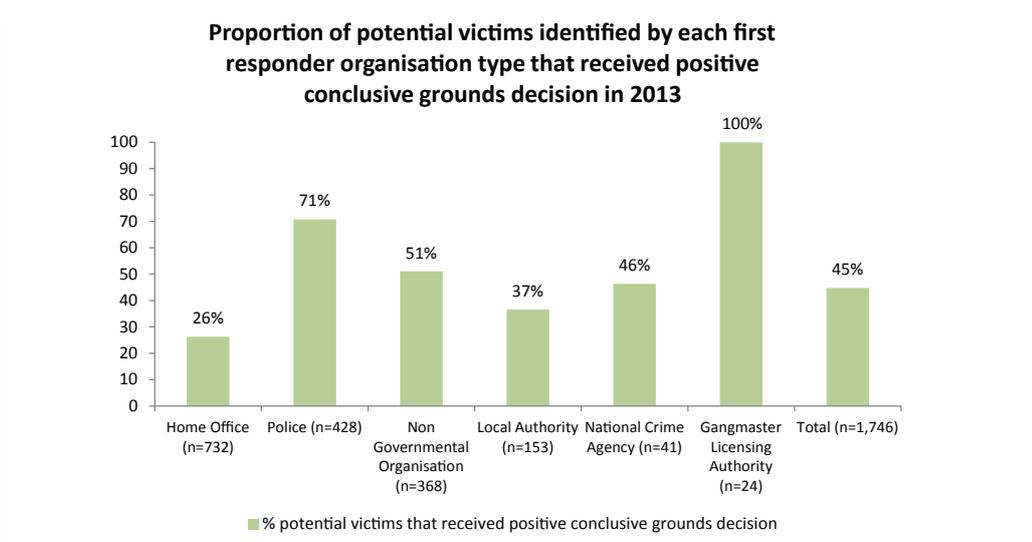


Figure 5

5.2.11 As can be seen in figure 5 there is a difference in likelihood of entry to the National Referral Mechanism and conclusive identification as a victim of trafficking depending on First Responder. This is likely to reflect the different situations for encountering victims. UK Visas and Immigration reasoning is that, prior to September 2013, it was refusing most cases of ‘historic’ trafficking, those which had happened some time before, where the victim had escaped their trafficker and in some circumstances had even managed to restore their own life but later had been identified as a potential victim of trafficking. Following the legal judgment in the case of Atamewan²² UK Visas and Immigration changed

22 <http://www.bailii.org/ew/cases/EWHC/Admin/2013/2727.html>

its decision-making and now 86% of cases²³ are accepted into the National Referral Mechanism at the reasonable grounds decision.

5.2.12 Many Non-Governmental Organisations have told us that they have developed, through years of experience, the ability to identify a genuine victim of trafficking. However, we have also heard that some Non-Governmental Organisations are reluctant to identify those whom they *do not* believe to be victims of trafficking, once they have been provided with support, because of the individuals' vulnerability and a concern as to what will happen to them if they are not in the National Referral Mechanism process

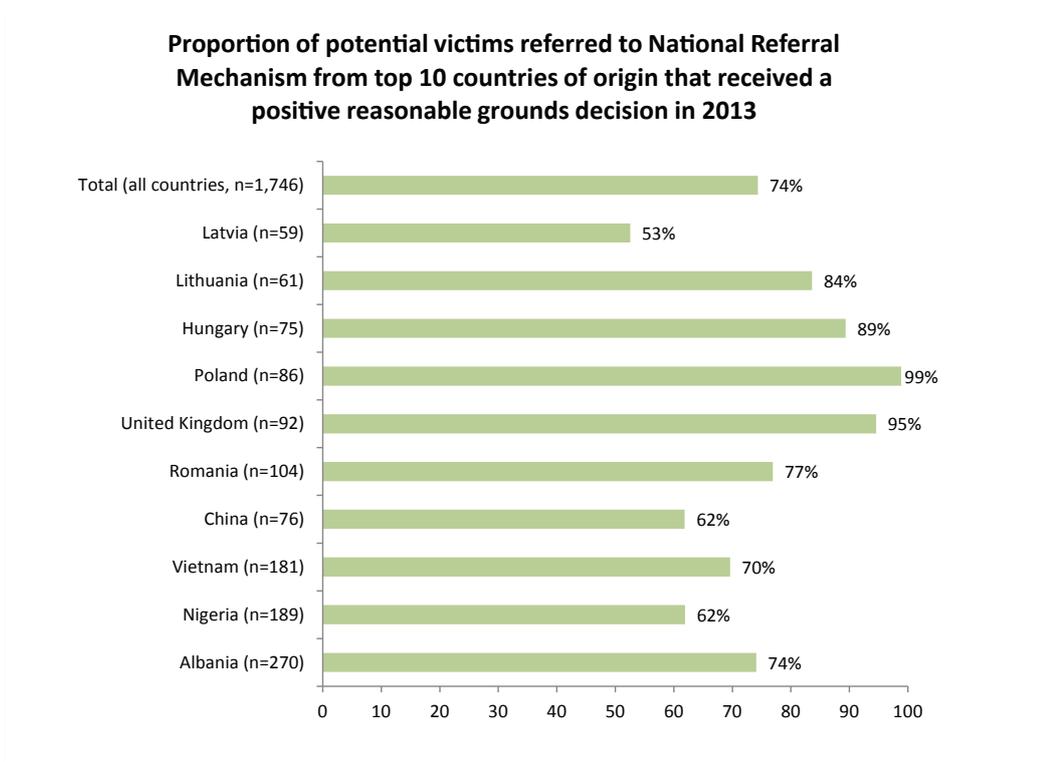


Figure 6

5.2.13 Non-Governmental Organisations have suggested that there is a nationality bias in acceptance into the National Referral Mechanism aside from the difference in acceptance between UK/EEA and non-EEA nationals. Others argue this is often due to how and when victims are identified and lack of evidence of a crime. Generally a higher percentage of EEA nationals received positive reasonable grounds, with the exception of Latvia (53%), we believe the figures are fairly similar and do not suggest a nationality bias.

²³ January-March 2014 NRM data

5.3 Options

- 5.3.1 We recognise that it is important to raise awareness within those organisations encountering victims, but it is not realistic to assume that all staff in large institutions will have the in-depth knowledge required to make referrals. It might be appropriate to encourage organisations to have a lead who can be a source of expertise and also help train other staff. This approach has been used in Northern Ireland to good effect.
- 5.3.2 We believe a more professional approach for the role of First Responder should be developed. We believe it would be valuable to explore a core curriculum for all Slavery Safeguarding Leads which helps develop high standards in the identification, decision-making, data capture and interaction with potential victims of trafficking.
- 5.3.3 A large majority believe some process needs to be established that assures a level of quality and provides feedback. We heard evidence from many people about options for accrediting First Responders. Some thought accrediting trainers in organisations would be effective, others thought that individuals within public bodies, not the bodies themselves, should be accredited to refer to the National Referral Mechanism. We believe that a light touch process, that provides assurance through training and feedback and which places the onus on the public body to accredit Slavery Safeguarding Leads, is appropriate and the least costly.
- 5.3.4 We believe the term First Responder has little meaning to most people; Slavery Safeguarding Leads may explain the role more effectively.
- 5.3.5 The Review heard from many who believed information to support a referral could be collected in shorter time after a potential victim has been extricated from their trafficker and placed safely. This would help those for whom the jump from their trafficking situation into the National Referral Mechanism feels too great or who are so traumatised that disclosure is difficult and requires the development of a trusting relationship.
- 5.3.6 The form used for referrals needs revision to support Slavery Safeguarding Leads in capturing the necessary information for a high quality referral to the National Referral Mechanism.
- 5.3.7 The professionalising of the Slavery Safeguarding Lead role (see 5.3.2) will provide high quality and more accurate referrals into the National Referral

Mechanism. We are aware that some victims of trafficking are not identified until they are in prison or detention; we want the awareness raising described at 4.4.1 to reduce the possibility of this happening. There is however a risk that some in prison or detention, might try to present themselves as victims of human trafficking if acceptance into the National Referral Mechanism may lead to release. We support a separate process for those in detention and prison, involving a manager within the case management unit (see 8.4.3) endorsing the referral.

5.3.8 The three stage process (referral, reasonable grounds decision and conclusive grounds decisions) could remain. We believe the evidence demonstrates that the current process is over-engineered and costly. Improving the quality and robustness of referrals appears key to most of those involved – better referrals will result in better decisions.

5.3.9 We have debated the need for a separate reasonable grounds decision if there is a properly constructed referral by a trained and accredited Slavery Safeguarding Lead. Once referrals to the National Referral Mechanism are of a consistently high standard, there is an argument for ending the separate reasonable grounds decisions. Whilst there may be an argument to retain a separate check point to ensure that there is no information held which might influence a decision to refer into the National Referral Mechanism, there are also strong arguments for only having one decision for entry to the National Referral Mechanism.

5.3.10 These include:

- The low percentage of negative reasonable grounds decisions at this point (between 10-15%²⁴)
- Quality referrals with follow up checks simplifies the system
- It will remove a costly decision point
- It provides a greater level of certainty for vulnerable victims
- It retains the ability to provide a fast conclusive grounds decision where appropriate, including where the person is clearly a victim or where further information demonstrates a fraudulent claim

5.3.11 We believe that within a reasonable period of time and following some training, the skills of Slavery Safeguarding Leads will ensure that their referrals will meet the requirements of the trafficking convention. Then, the reasonable grounds decision should be phased out.

²⁴ NRM data January-March 2014

- 5.3.12 Following discussions with current First Responders and our proposals regarding reasonable grounds decisions many Non-Governmental Organisations have indicated that they would prefer the responsibility of Slavery Safeguarding Leads to fall on public bodies due to the consequences of referral decisions being challenged. This role needs to be fulfilled by an employee of a public body, or an accredited body working on behalf of the Home Secretary.

5.4 Recommendations

- 5.4.1 The referral process of the National Referral Mechanism should be overhauled by professionalising the current First Responder role and reviewing the referral and reasonable grounds process.
- 5.4.2 The First Responder should be replaced by an accredited Slavery Safeguarding Lead, who should be an employee of a public body, and provided with guidelines for referral to the National Referral Mechanism.
- 5.4.3 Feedback should be available for these leads on their referral quality and outcomes.
- 5.4.4 We believe it important that the Secretary of State for the Home Department retains an oversight function in relation to these referrals including the ability to reject a referral into the National Referral Mechanism in rare and exceptional circumstances and should provide oversight of decisions where a decision to refer could lead to release from prison or detention.
- 5.4.5 The reasonable grounds decision can be replaced by an alternative referral mechanism once the successful implementation of accredited Slavery Safeguarding Leads has occurred.

“NGOs continued to report that UK authorities focused on the credibility of a potential victim too early in the identification process, noting that most victims who have only recently escaped control of their traffickers do not always reveal the truth about their experiences when first questioned; this continued to result in victims’ detention and imprisonment, including forced repatriations of trafficking victims, putting them at great risk of hardship or retribution upon their return.”

United States Department of State: 2012 Trafficking in Persons Report - United Kingdom



Access to Support



6. Support

- 6.1.1 Support is available for those who receive a positive reasonable grounds decision through to the point where they receive a positive conclusive grounds decision. This support varies ranging from safe house accommodation with live-in support workers through to outreach support for those living with friends or in asylum support accommodation. Support for children will be discussed later in section 10. For those receiving a positive conclusive grounds decision support is currently available for 45 days, or until this decision is made, after which they have 14 days to leave support with the help of service providers. Those who receive a negative conclusive grounds decision are required to exit support services within 48 hours.
- 6.1.2 The description of contracted support relates to England and Wales; there will be some differences for Scotland and Northern Ireland, however the principles remain broadly similar.

6.2 Findings

- 6.2.1 Entry to the National Referral Mechanism provides for the main intervention for victims. We have been asked to consider provision of support to all victims of modern slavery. Some victims of the section 1 offence in the Modern Slavery Bill are already referred into the National Referral Mechanism. However, only those who are also victims of the section 2 offence meet the criteria for support under the Convention.
- 6.2.2 The analysis of submissions received by the Review from Non-Governmental Organisations working in this area shows overwhelming support for the preservation of the National Referral Mechanism solely for victims of trafficking.
- 6.2.3 The current arrangements for support are varied. Support is not intended to provide rehabilitation, which could take many years. It is to allow the person to begin to recover and to go on to rebuild their lives following the 45 days reflection and recovery. This period should provide initial safety and preparation for what happens next. It is universal opinion, amongst those consulted, that support should be related to need.

- 6.2.4 The contract for support details that a support provider will provide appropriate accommodation and subsistence, and access to services including but not limited to: medical (including mental health and detox), dental treatment, sexual health services, specialist counselling, resettlement support, signposting at post-service exit, support with applications for immigration and legal advice or for benefits, ESOL classes and preparation for work.
- 6.2.5 We noted with concern that, apart from the measures service providers undertake themselves, there is no formal audit or inspection of services provided to victims under the contract or any gathering of data to review whether desired outcomes have been achieved.
- 6.2.6 Practically, at present victims within a safe house are accommodated or supported by outreach for the length of time to make a trafficking decision. The table below shows average times for support for cases entering the National Referral Mechanism in 2013 and in the first three months of 2014²⁵.

Year of referral	Average days in safe house	Average days in outreach support	Average days outreach support to those in asylum support accommodation
2013	69	121	118
Jan-Mar 2014	68	103	103

Figure 7

- 6.2.7 The current contract allows for accommodation with outreach support to those living in other accommodation.
- 6.2.8 We heard concerns about the suitability of asylum support accommodation for some victims of trafficking. This accommodation is used regularly to supplement the safe house provision for those victims who also have an asylum case. This may be suitable for some, but not all. Shared rooms or mixed gender accommodation are not suitable for those who are highly traumatised or who have been victims of sexual exploitation for example. The accommodation needs of victims must be accurately assessed. No one size fits all.
- 6.2.9 Many to whom we spoke thought that victims “are failed” at the end of the 45 day period. Many are still profoundly vulnerable and are left to negotiate on their own a return home or re-integration into the community alongside the accessing of any mainstream support.

²⁵ Data from the Salvation Army

- 6.2.10 The transition back into the mainstream following support is essential for the victim. There are pockets of good practice. We have seen in West London that the support provider, *Hestia*, has made contacts within Hillingdon local authority to facilitate transition to mainstream accommodation. In Sheffield, City Hearts and *Ashiana* have made links with the Council. However, this is not a standard approach across the UK and results in victims not tapping into the varied support available through Non-Governmental Organisations, local agencies and authorities.
- 6.2.11 It is clear that some providers of support during the reflection period do not see helping a victim provide evidence to the police as being a vital component of their work. There is evidence that prosecution and potential reparation help victims and may stem the flow of abuse. With a more concerted and coordinated effort from everyone involved, the criminals behind this abuse have a greater chance of being brought to justice.

6.3 Options

- 6.3.1 We have received many recommendations from those working to support victims on how the system for support might be improved. These have included:
- 6.3.2 Increasing the period of support from the current 45 days to 90 days.
- 6.3.3 The exit times from support are currently 48 hours if not conclusively identified as a victim of trafficking and 14 days if conclusively identified. These are shorter than the times for exit from asylum supported accommodation of 14 days and 28 days respectively. The time taken to obtain a biometric residence card and/or a national insurance number is significantly longer than the current exit time from support. For those who have been in the process of identification it is often only possible for them to start to think of their next steps following notification of a decision. It makes sense to provide more time after the decision has been made for integration or return for a non EEA national.

“The Panel recommends that a ‘survivor support pathway’ should be developed in the UK in order to ensure that outcomes for survivors are improved and that their long-term recovery is protected and maintained. This could include a ‘mentor’ who would ensure that the individual is, for example, gaining access to work and housing – there is a significant need for ongoing support beyond the 45-day reflection period.”

Establishing Britain as a world leader in the fight against modern slavery: Report of the Modern Slavery Bill Evidence Review

- 6.3.4 Following conclusive identification of a victim of trafficking focus should fall on supporting a return home or integration and, where a victim is eligible, consistently providing support to find work, English language lessons, training and housing. This would be particularly helpful to those who may find themselves homeless after the 45 days reflection and recovery period. We also suggest that provision should be made for the development of an infrastructure to support victims beyond the National Referral Mechanism reflection and recovery period. This could be provided in a variety of cost-effective ways which also offer containment for the victim such as a monthly drop-in centre available for six months to a year after a victim has left the National Referral Mechanism or a regular catch-up 'phone call.
- 6.3.5 To understand outcomes for victims we suggest the option of regular follow ups for up to two years. At this time standard questions should be asked to monitor and report on the outcome for the victim.
- 6.3.6 We have heard from many, of victims leaving the National Referral Mechanism and being found again. There is no process for consistently capturing biometric data of victims²⁶. We believe that collection of such data will help the location and later identification of victims. It must be ensured that the victim consents and will not experience re-traumatisation in such a process.
- 6.3.7 We think it important to ensure the provision of safe-housing to all victims who need it so that they can be effectively supported during their reflection and recovery. In that period the victim should have a full needs-based assessment carried out by the provider; this assessment should reflect the types of intervention, including accommodation, that are most appropriate for that individual.
- 6.3.8 We were surprised at a lack of core skills required to work with victims of human trafficking in hostel and other accommodation. We were pleased, during the course of the review, to see published²⁷ a practical handbook on standards for accommodation and staff employed within such settings. We strongly believe that staff working in this sensitive and complex area need appropriate training and regular supervision and support. We saw great examples of this in operation in settings such as City Hearts in Sheffield and Tara in Glasgow.
- 6.3.9 We propose that safe house providers are asked to conform to a standard audit of their premises and their methods of emotional support for their staff.

26 Fingerprints or photographs

27 Trafficking Survivor Care Standards, The Human Trafficking Foundation 2014

- 6.3.10 We heard from many sources that organisations are not able to deliver what the victim requires without a multi-agency approach to the coordination and delivery of support. Building local links with Government departments, local authorities, housing associations, local health provision and Non-Governmental Organisations will provide for more holistic support for the victim.
- 6.3.11 The proposed changes to the National Referral Mechanism require consideration of provision of legal advice on referral rather than at reasonable grounds decision. Access to legal aid is available for asylum seekers on application for asylum and as a result human trafficking victims may claim asylum as a way of obtaining early legal aid. There is unlikely to be a huge increase in the cost of legal aid because a large majority of non-EEA victims are already claiming it through the asylum process.²⁸
- 6.3.12 Non-Governmental Organisations have asked for provision of a fixed grant of immigration leave to all conclusively identified non-EEA victims of human trafficking. The discretionary leave provision which currently exists is more flexible than a fixed grant of leave, allowing for a grant of leave which reflects the needs of the victim. In addition, it is not considered that all victims of trafficking need or wish to remain in the UK once extricated from their trafficking situation.
- 6.3.13 We were told of significant problems for people who are deemed to be victims of human trafficking who are granted a period of leave to allow them to give evidence in a prosecution. The renewal of that leave is not simple and the victim may have lost touch with those who originally supported them. We heard of significant anxiety created unnecessarily for people when no one is in touch with them and their leave is about to lapse. Access to support is at risk and this forces some back to traffickers. Prosecutions may take more than 12 months to mount and thus we think the case management team (see 8.4.3) should keep a track of such cases and contact the victim to remind them to apply to UK Visas and Immigration to ensure leave is not simply allowed to lapse.
- 6.3.14 There are assisted voluntary return programmes available for those who are identified as victims of trafficking. There is some availability of reintegration support but this needs to be tailored to meet the specific needs of victims.

²⁸ Legal aid is made available to victims of trafficking in relation immigration matters if either a reasonable grounds or conclusive determination has been made. This is specific to immigration matters, victims of trafficking's access to criminal legal aid or other civil matters (such as damages claims in relation to their exploitation) are not dependent in any way on the NRM process. In the event that reasonable grounds determinations were to be phased out and the preferred replacement criteria was a referral to a first responder, Paragraph 32 of Schedule 1 of the Legal Aid, Sentencing and Punishment of Offenders Act 2012 would need to be amended. This is done through the making of an Order under Section 9 of the Act. Such an Order requires affirmative resolution and six months should be allowed for drafting this process.

- 6.3.15 We believe some work needs to be undertaken quickly to make better use of European and other funding to afford victims the option of returning safely to their country of origin.

6.4 Recommendations

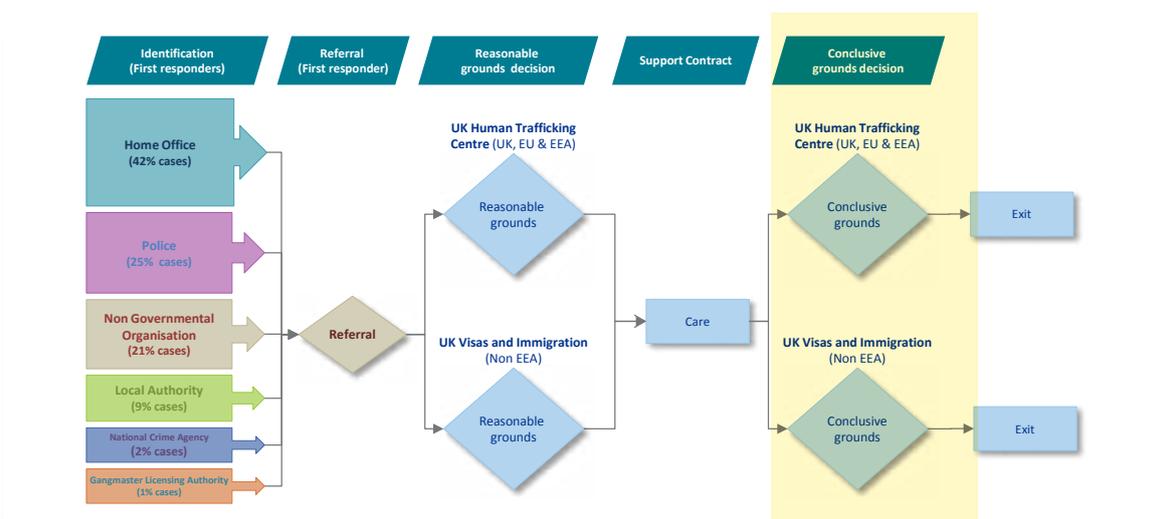
- 6.4.1 Support should be provided based on an assessment of the individual needs of the victim. Consideration should be given to entry and exit timescales, support post-conclusive identification, and the audit and inspection of support provision.
- 6.4.2 **National Referral Mechanism support:** to be provided to all victims covered by the Modern Slavery Bill.
- 6.4.3 **Outreach support:** to provide outreach support to prisons and detention centres where a potential victim has been identified.
- 6.4.4 **Accommodation:** provision of accommodation, during the reflection and recovery period, should be based on an assessment of the needs of the victim.
- 6.4.5 **Alignment of exit timescales:** we should seek to align the exit timescales from services for non EEA nationals with those for asylum support.
- 6.4.6 **Support provider role:** the support provider should concentrate on accessing local services, as well as providing a safe, professional environment for support and care. We recommend that support providers build strong relationships in their local area with those who can provide services for victims of trafficking.
- 6.4.7 **Audit and inspection:** an audit or inspection of provision within the contract should confirm that the standards of support are provided at the agreed level. This should include regular inspections of accommodation and audit of qualifications for those providing counselling services.
- 6.4.8 **Integration services:** victims should be provided integration assistance either in the UK, by facilitating access to mainstream support and assisting with applications for education or work, or prepare the victim for return to their home country liaising with the provider of supported voluntary returns.
- 6.4.9 **Post conclusive identification support:** there should be provision of simple outreach services for up to twelve months after the exit of an eligible victim, with a positive conclusive identification and to provide a system for monitoring

and tracking service users for up to two years after exit from the service which links with the case management team.

- 6.4.10 **Biometric identification:** as long as the victim consents and will not experience re-traumatisation, the collection of biometric identification should be encouraged within the referral or support process.



7. Conclusive Grounds Decision



7.1 Issues

7.1.1 The conclusive grounds decision is made by UK Human Trafficking Centre, UK Visas and Immigration or Immigration Enforcement (Criminal Casework Directorate). It is based on the referral form and any other evidence available. If there is insufficient evidence to make a decision the case worker is expected to gather evidence or make further enquiries during the 45 day recovery and reflection period. Relevant agencies are consulted in order to reach a conclusive decision on whether the person has been trafficked.

7.1.2 Police and intelligence reports relating to the alleged crime can provide objective evidence to strengthen a claim and due weight is given to the reports and views of:

- local authority children’s services (for child victims)
- the organisation supporting the individual
- any medical reports submitted are considered

7.2 Findings

7.2.1 Stakeholders agree current timescales for the conclusive grounds decision are a problem.

- 7.2.2 UK Visas and Immigration is working to bring conclusive grounds decisions within a service standard of 98% of straightforward decisions within six months. In 2013 the UK Human Trafficking Centre made a conclusive grounds decision in an average of 56²⁹ days.
- 7.2.3 It is clear there are situations where decisions will be reached more quickly or slowly than the average due to the particular circumstances of an individual. Where there is evidence as a result of police activity which has freed the victim from their situation of exploitation, it may be possible to make an early decision. A conclusively identified victim of trafficking will still be eligible for the full 45 day recovery and reflection period, including support even if identified early.
- 7.2.4 We heard of barriers to speedy decision-making including obtaining information from other organisations where the victim is unable to give an account of their trafficking, or if the victim needs time and support to enable co-operation.
- 7.2.5 We heard of decision-making being delayed when awaiting information about whether the police are pursuing a prosecution or a court outcome, neither of which are necessary under current guidelines to determine whether a person is a victim of trafficking.
- “Strip the UK Border Agency of its Competent Authority status. This will ensure that the first decision made about a victim of modern slavery is not related to their immigration status, but is a welfare decision based solely on their need for support. They are victims first.”**

CSJ report - It happens here
- 7.2.6 We have heard from those supporting victims that any delay in decisions can exacerbate a sense of confusion and fear about their future and impede them making a recovery. It should be possible in most cases, if evidence is made available by all parties involved, for a decision to be made in around 30 days. This would provide a benefit to the victim (who would not be kept anxiously waiting) and could be supported by a longer time post decision for moving to the next phase of their lives.
- 7.2.7 There has been widespread concern about an assessment of a victim’s credibility being used to support a decision. In particular the use of travel documents, which may have been genuinely issued but either do not relate to the victim or about which the victim has little knowledge.

²⁹ NRM data 2013 (as of 08/09/14) time from referral to conclusive decision for those cases getting a positive reasonable grounds decision

- 7.2.8 Stakeholders have said “It is worrying to see how much weight is given to information given in visa applications, likely to have been given under duress” and are “concerned about an over reliance ... on documents used for travel. It is widely accepted that these documents may be forged and are used by traffickers”.
- 7.2.9 When making a decision, UK Visas and Immigration tests all relevant material facts, consider objective evidence and, where appropriate, applies the benefit of the doubt. The National Referral Mechanism guidance allows for a negative decision to be made on adverse credibility, and UK Visas and Immigration emphasises that its decision, whether or not someone is a victim, is assessed to civil standard of proof.
- 7.2.10 Victims who escape and present themselves may not know where they have been held or the names of those holding them and the only evidence they have is the story of their experience. Research has shown that those who are severely traumatised have difficulty in providing a coherent story. These factors together can create a perception that decision-making is heavily (and wrongly) based on credibility whereas the decision-maker may feel constrained by the lack of evidence of a crime.
- 7.2.11 There has been considerable challenge from Non-Governmental Organisations regarding the language used in decision letters. It is argued that letters do not take into account that a person referred to the National Referral Mechanism is likely to be vulnerable even if not a victim of trafficking.
- 7.2.12 Use of language such as ‘ ...xx has claimed to be a victim of trafficking’ is seen as unhelpful when the victim is likely to have been referred to the National Referral Mechanism by a First Responder organisation. Letters have contained the phrase ‘whilst your account is internally consistent there is a lack of external corroboration;’ this is confusing for both victims and stakeholders where for example the victim does not have the names of those who trafficked them or the location in which they were held.
- 7.2.13 The template for communicating that a person has not been conclusively identified as a victim contains the following:

‘Consideration has been given as to whether there are any mitigating circumstances in relation to your account. No evidence has been received to suggest that you are suffering from any mental, psychological or emotional trauma and you have not received any counselling. It is considered that there are no mitigating circumstances in your case.

Due to the internal inconsistencies in your account, your credibility has been damaged to the extent that your claim to have been trafficked cannot be believed and is rejected below.’

- 7.2.14 Yet access to counselling is difficult to obtain and is not in any event always appropriate in the early stages of recovery. It is well documented that someone suffering from trauma may produce an inconsistent account of his or her experiences³⁰.
- 7.2.15 Our consultation and analysis of stakeholders’ responses has found a deep concern among Non-Governmental Organisations on the consideration of asylum and trafficking decisions. These include the conflation of asylum and trafficking, the timeliness of decisions and the use of arguments about credibility which focus on minor discrepancies.
- 7.2.16 To obtain all perspectives, the Review has spent a significant amount of time and dedicated resources to understanding how the process currently works across UK Human Trafficking Centre and UK Visas and Immigration listening to many staff.
- 7.2.17 UK Visas and Immigration makes the reasonable case that its production of two separate decisions for asylum and trafficking based on only one interview, streamlines the process for victims. Decision-makers are keen to emphasise that they never lose sight of the fact that “claimants are potential victims first and foremost”. They are aware of the dangers of re-traumatising victims through processes that involve the victim repeating their account of the incidents.
- 7.2.18 However, we think it is difficult to maintain confidence in making two different decisions when using the same information and staff.
- 7.2.19 In the process of our own review of the system, we have found a number of issues with the current approach to decision-making for victims with asylum claims which have included:

³⁰ There are many articles on this subject including: Posttraumatic Stress Disorder Following Assault: The Role of Cognitive Processing, Trauma Memory, and Appraisals Sarah L. Halligan, Tanja Michael, David M. Clark, and Anke Ehlers 2003

- trafficking victims being asked if they want asylum and trafficking interviews together
- decisions being made at the same time, the same language and phrases being used in both decisions and decision letters being sent together in the same envelope.

7.2.20 We have seen many improvements achieved with the creation of the UK Visas and Immigration hub, but we believe the UK Border Agency legacy significantly damages the credibility of making decisions in this particular area. If we wish to create an effective and efficient system in which all stakeholders work together collaboratively and transparently we need to address both the perceived lack of credibility and the reality of the way in which cases are managed.

7.2.21 Figure 6 showed the difference in acceptance to the National Referral Mechanism for potential victims by nationality. Figure 8 shows the difference at conclusive decision. The data is broadly similar, although China has a particularly low acceptance at both reasonable grounds and conclusive grounds decision.

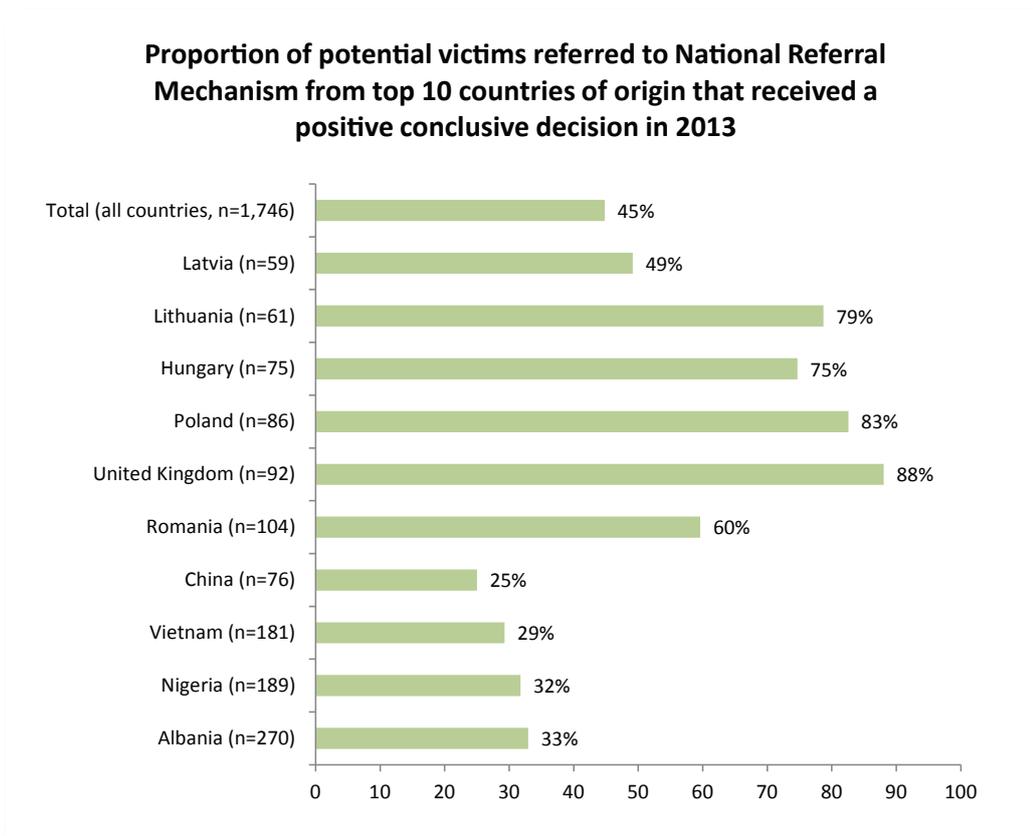


Figure 8

7.3 Options

- 7.3.1 The benefit of making an asylum decision and conclusive trafficking identification on the same material is that the victim only needs to have one interview. The Review has not seen compelling evidence that an interview is always necessary to provide evidence for a trafficking claim if all agencies provide the information they hold about a victim. The UK Human Trafficking Centre does not interview.
- 7.3.2 UK Visas and Immigration also believes that this joint decision-making approach gives faster access to refugee status where appropriate; that there is an explicit link between trafficking and immigration status; and separating the conclusive identification from the immigration decision would slow down the progress of non-EEA nationals.
- 7.3.3 We have heard the reasons why a conclusive decision can impact on an asylum decision, but are not persuaded that this means the two need to be considered by the same person. We understand that if conclusive trafficking decisions are easy to obtain and mean that an individual is more likely to be granted asylum, then this could act as a route by which unscrupulous individuals abuse the system. However, we believe there are better ways of ensuring that the National Referral Mechanism provides only for victims of trafficking rather than by linking the two decisions.
- 7.3.4 We gave consideration to whether or not the threshold for conclusive grounds decisions should change.
- 7.3.5 Conclusive grounds decisions are made on the ‘balance of probabilities’ - the test used in civil courts, and this has been clarified and tested legally. The balance of probabilities means ‘that the victim is more likely than not to be a victim of trafficking’. In many situations it is impossible to say with absolute certainty whether or not a person is a victim of trafficking. In addition, human trafficking is a crime with a significant penalty. A standard of proof which is used for civil proceedings is appropriate for the allegation of such a serious crime.
- 7.3.6 There may be occasions where on the balance of probabilities a person is deemed, or not, to be a victim but at a later stage new information comes to light which changes the evidence that was before those making the conclusive identification. We consider that any identification or otherwise of a victim of trafficking may be revisited, in defined circumstances, if new evidence becomes available.

- 7.3.7 All stakeholders consulted have supported a process which ensures that a wide range of information is available to make a decision. We have considered various options for this including using current safeguarding mechanisms within Local Authorities and regional anti-trafficking monitoring groups.
- 7.3.8 We scaled our approach based on the number of victims and the need for those making decisions to gain the required expertise. After examining the various possibilities the review has concluded that the best option would be a small number of regional panels (around 7 or 8) across the UK which meet, 'virtually', about once a week. The panel will be chaired by an independent chair appointed by the Home Secretary and include representatives from key disciplines who have the expertise to understand the evidence presented to them, make judgements about whether this evidence meets the threshold for trafficking, and can provide advice on what happens next for the victim. The panels should include public bodies and representation from relevant Non-Governmental Organisations.
- 7.3.9 For the avoidance of any doubt, one body with evidence pertinent to consideration of trafficking cases is UK Visas and Immigration. We consider it must be a member of the multi-disciplinary panels in cases where it has a valuable role to play in providing evidence of immigration history and patterns of behaviour that could, where relevant, inform a trafficking consideration for non-British citizens.
- 7.3.10 The advice and any strategic feedback can be shared with local safeguarding boards and multi-agency safeguarding hubs as appropriate.

7.4 Recommendations

- 7.4.1 A process of conclusive identification of trafficking victims through regional multi-disciplinary panels should be tested with a view to ceasing the sole decision-making roles of UK Visas and Immigration and the UK Human Trafficking Centre.
- 7.4.2 **Multi-disciplinary panels:** a multi-disciplinary decision-making approach is adopted with regional panels.
- We recommend panels are chaired independently with chairs appointed by the Secretary of State for the Home Department. For Scotland and Northern Ireland we consider a joint panel could operate with the chair's appointment being made in conjunction with those administrations. For Wales the appointment could be made by the Secretary of State for the Home Department in conjunction with the Welsh Assembly Government.

- Having panels across the UK that meet virtually would allow for areas of specialism to develop so that panel members and especially chairs, could when required, advise other panels. The Anti-Slavery Commissioner should meet with the panel chairs at least twice a year. We recommend this approach is tested in one or two areas.

7.4.3 **Separation of the trafficking** where there is an asylum application in addition to the National Referral Mechanism referral these are not considered together or by the same person.

7.4.4 **Service Providers and Panels:** support providers should provide information to relevant panels.

7.4.5 **Quality assurance:** where a review is requested another panel chair will act as a ‘second pair of eyes’³¹.



³¹ Legal advice is that a route of challenge for procedural failings could be an administrative one, allowing for consideration of whether the panel had followed due process rather than reconsideration of the decision itself and this requirement could be fulfilled through the ability for a decision to be administratively reviewed or by way of judicial review if necessary

8. Governance

8.1 Issues

- 8.1.1 The National Referral Mechanism is managed and funded by the Home Office. The responsibility for the appointment of First Responders currently lies with the Modern Slavery Unit through the National Referral Mechanism oversight group. Two main bodies are responsible for case work and decision-making - UK Visas and Immigration (part of the Home Office) and UK Human Trafficking Centre (part of the National Crime Agency). Support services within England and Wales are provided via a contract let, at present, to the Salvation Army.
- 8.1.2 The structure of the UK Visas and Immigration handling of referrals was changed during 2013 with the creation of a central hub which now handles the majority of National Referral Mechanism cases coming to UK Visas and Immigration, with a few exceptions of the Criminal Case Directorate, Detained Fast Track (asylum process) and Third Country Unit (asylum applications where the application falls to be considered by another country not the UK).
- 8.1.3 The devolved administrations' case work is undertaken under the same arrangements as those for England and Wales but Scotland and Northern Ireland let, fund and manage support services separately.

8.2 Findings

- 8.2.1 The governance of the current system is fragmented and lacking an overall performance framework. It has evolved since the system's implementation in 2009 and, whilst improved, cannot be described as efficient or effective.
- 8.2.2 There is insufficient accountability for the outcomes of the process or the appropriate management of the process itself. This includes a lack of accountability for:
- ensuring the victim's needs are met
 - the management of timescales to minimise unnecessary costs
 - the quality of referrals into the system

- the quality of decision-making
- the quality and professionalism of services provided
- the development and management of a performance management framework
- the gathering of intelligence
- the collaboration with others stakeholders across the system
- understanding the outcome for a victim

8.2.3 The Review has heard the views of the many voluntary organisations that work with victims of trafficking. Their views on the governance arrangements for the National Referral Mechanism can be summarised as follows:

8.2.4 **Independence:** a majority press for the removal of responsibility for the National Referral Mechanism from the Home Office and the establishment of an independent body outside of UK Visas and Immigration and the Police.

8.2.5 **Multi-disciplinary approach:** a multi-disciplinary approach to decision-making that includes the Non-Governmental Organisations working within the area.

8.2.6 **Statute:** a desire to place the National Referral Mechanism on a statutory footing.

8.2.7 **Appeal:** providing a right of appeal to challenge those decisions which are believed to be wrongly made.

8.2.8 It is clear from the wider analysis of stakeholders and our own observations that the current system is in need of a single accountability and management structure that will support an overall improvement in the system whilst allowing for local input.

8.2.9 It is vital that any system is properly managed so that cases are not delayed unduly. The timeliness of decision-making has been discussed at 7.2.2. Clearly any effective process needs tight performance management with agreed outcomes. We believe that the management of the National Referral Mechanism should include an escalation process which sees all cases being referred at agreed decision points if the case has not reached the expected stage.

8.2.10 There are significant dependencies between organisations that are involved in the identification and support of victims but we were saddened to note there is some antagonism between the organisations involved in the work of supporting trafficked people. This is not in the best interest of victims. Some examples of

this have included a support provider telling us of their reluctance to give further information for fear of it being denigrated by UK Visas and Immigration. Equally UK Visas and Immigration and UK Human Trafficking Centre have reported profound difficulties in obtaining information about potential victims from key service providers. This is unacceptable and we make recommendations relating to this below (see 9.4.4).

- 8.2.11 Any changes to the current Governance model need to be victim focused. Differences between stakeholders should be put aside in the interest of supporting extremely vulnerable people and providing them not only with safety and security, but also with a system where all parties work together.

“The Panel recommends that the Modern Slavery Bill include a provision for an appeal or review mechanism against an NRM decision. It is appreciated by the Panel that a full appeal procedure may be cost-prohibitive. But at the very minimum the Panel would hope for the establishment of an independent person (who is experienced in the field of modern slavery) or body outside of the decision-making Competent Authorities who, in the event of an appeal from a refusal, could review the decision.”

Establishing Britain as a world leader in the fight against modern slavery: Report of the Modern Slavery Bill Evidence Review

- 8.2.12 There is a widely held belief that the only way to make the National Referral Mechanism work effectively is for it to be put on a statutory footing with a right of appeal effectively proscribing an adversarial system which is laid down in law and can be challenged through a legal process. Those advocating this system consider that it would be easier to hold Government to account on that basis.
- 8.2.13 The provisions within the alternative Modern Slavery Bill put forward by the Anti-Trafficking Monitoring Group³² are concerned firstly with placing the Council of Europe Convention on Action against Trafficking in Human Beings into statute. They focus on public authorities having a duty to identify victims of human trafficking and providing them with assistance and support; and for the Secretary of State to provide guidance to specify the steps public authorities must take. Secondly, for the Secretary of State to specify the procedures to be followed to implement the National Referral Mechanism and the procedures to be applied by the National Referral Mechanism including to give effect to the right to a renewable residence permit.’

³² http://www.antislavery.org/includes/documents/cm_docs/2014/a/atmg_modern_slavery_human_trafficking_and_human_exploitation_bill.pdf

- 8.2.14 This approach, in part, is suggested as a remedy to an existing and somewhat flawed system. The question also exists of how to make organisations co-operate effectively and we believe strongly that to put the National Referral Mechanism on a statutory footing now would not guarantee this. Further, it is worth noting that the existing Modern Slavery Bill includes a duty on the Home Secretary to issue guidance about indicators of trafficking, victim identification and arrangements for assistance and support to victims which goes some way to addressing these concerns whilst providing much needed flexibility.
- 8.2.15 Simply putting the Council of European Convention on Action against Trafficking in Human Beings into statute will not change the UK's commitment and obligations to abide by the trafficking convention or methodology with which it is implemented. Any process put on a statutory footing can become inflexible and unresponsive to changing demands and indeed improvements, due to the requirement to further legislate before making changes. Pinning the National Referral Mechanism down now would not be an effective methodology particularly when the National Referral Mechanism is going through a period of significant change.
- 8.2.16 A right of appeal is seen as giving a right to the victim to challenge any decision made and is, in part, being called for because of the high number of negative decisions for non-EEA victims and the perceived conflation with asylum claims. However, we are proposing a different decision-making process with a high level of independent scrutiny and multi- disciplinary decision-making.

8.3 Options

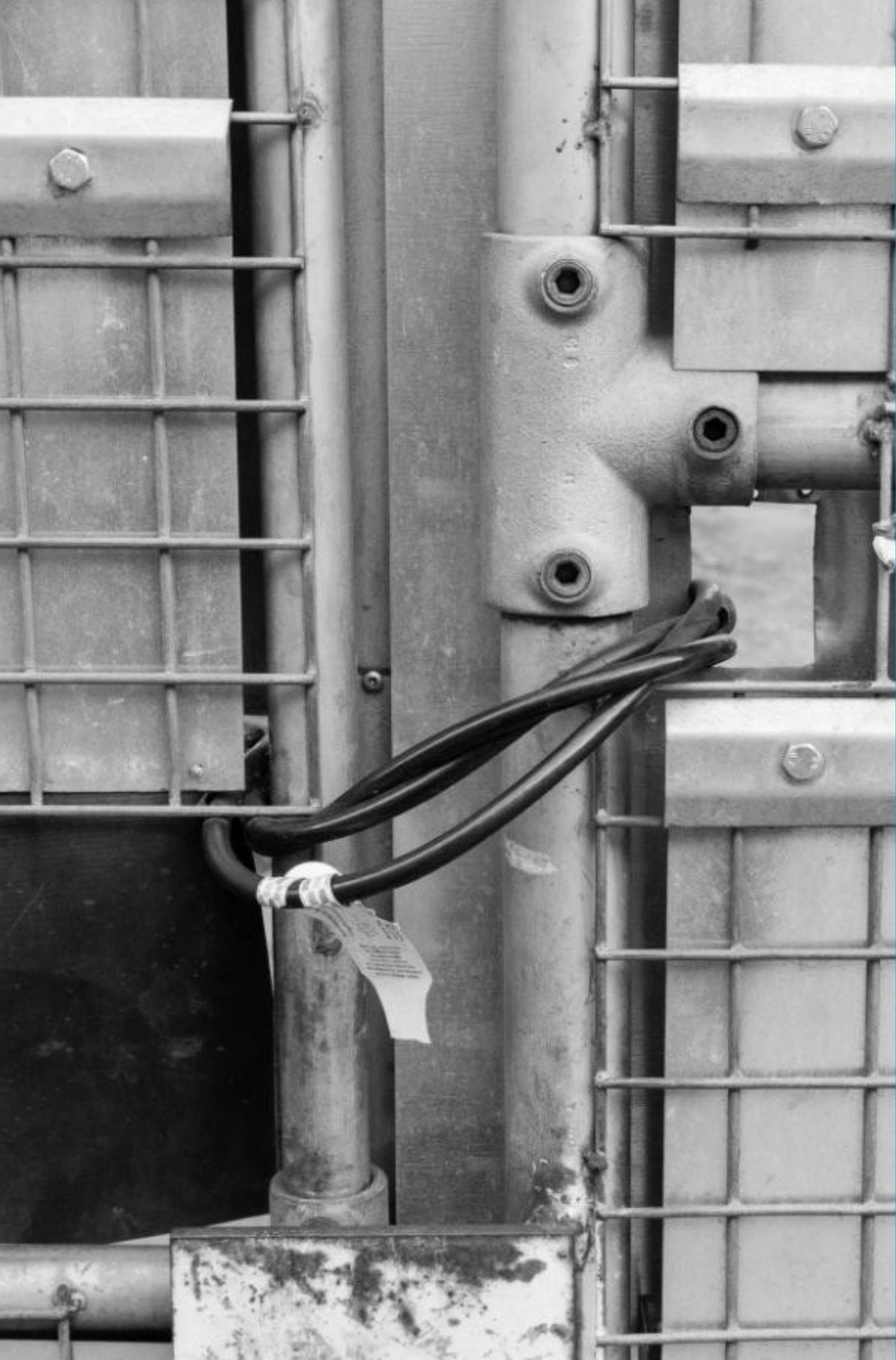
- 8.3.1 Although there is much support for placing the National Referral Mechanism on a statutory footing or providing a right of appeal, these may not be necessary if we have a well governed National Referral Mechanism. A multi-disciplinary, decision-making panel in which local representatives take responsibility for the decisions, should reduce the need for challenge. In addition putting the National Referral Mechanism on a statutory footing would enshrine a process which is evolving.
- 8.3.2 Consideration was given as to whether the National Referral Mechanism would sit best in another Government department. For adults, consideration was given to whether this process fitted best with other victim services within the Ministry of Justice and for children within the Department for Education or Local Authorities. However, we believe that with the work being led by the Home Office on the Modern Slavery Bill, the potential to expand the National Referral

Mechanism to all victims of Modern Slavery and the key role of the police and the Home Office as First Responders, the National Referral Mechanism sits best with the Home Office. Much of the work around Modern Slavery pertains to people subject to immigration control; and the development of a strong intelligence-led process to prevent, pursue, protect and prepare sits appropriately in the Home Office.

- 8.3.3 We considered the best option to ensure end to end governance of the National Referral Mechanism to be a case management unit within the Home Office where the case managers undertake the management of all cases throughout their lifecycle. This should include the receipt of the referral form, risk assessments, the gathering of data from other agencies, support providers and victims and the liaison and co-ordination with all parties dealing with a victim. This unit would also provide administrative and secretarial support to the multi-disciplinary panels and strong support for the devolved administrations.

8.4 Recommendations

- 8.4.1 A single management process for trafficking cases should be put in place and accountability for this system should lay with the Home Office.
- 8.4.2 **Accountability for the end to end system:** a stronger governance framework headed by the Home Office is required. This framework should contain a definition of clear accountabilities and responsibilities for all bodies involved in the National Referral Mechanism.
- 8.4.3 **A single case management unit:** we recommend the creation of a single case management unit, located in the most appropriate Home Office Department, with a small investment in a case management system that will support the management of case through its complete lifecycle.
- 8.4.4 **Performance management:** the development of a performance framework with a set of simple performance indicators for the management of cases to ensure identification is completed within the 45 day timescales or escalated if more complex, and against which we can measure the efficiency of the process and the outcomes it achieves for victims.



9. Data and Intelligence

9.1 Issues

- 9.1.1 There is no one system used to record data associated with the National Referral Mechanism. The data is collected from a number of sources and is collated on spreadsheets held securely by UK Human Trafficking Centre and UK Visas and Immigration.
- 9.1.2 The spreadsheet used by UK Human Trafficking Centre, which is the main collator of information has, like the overall system, grown organically over time as requirements evolved for management information. Whilst the staff working in both areas are conscientious and committed to managing the information appropriately, the tools available fall far short of what is required.
- 9.1.3 There are few established data-sharing protocols between the stakeholders involved in the system.

9.2 Findings

- 9.2.1 The current data collecting and collating provision does not support effective identification of victims, assist with prosecutions and/or support the production of meaningful management information on how the process is working from end to the end. What does exist is difficult to manage and unreliable. We heard from staff that the information systems in the UK Human Trafficking Centre are often slow and hard to use.
- 9.2.2 The data collected provides very little of the strategic or intelligence analysis we would expect from a comprehensively managed system with effective IT to support it. As a result the Review has found it difficult to obtain answers to some fundamental questions including:
- the timescales taken for victims to progress through each stage of the process
 - the locations at which victims present
 - the locations of offences
 - the percentage of victims found in situ

- the reasons for delays within the National Referral Mechanism
- the numbers of potential victims identified but unwilling to enter the National Referral Mechanism
- the outcomes for victims who go through the National Referral Mechanism, for example access to support and the percentage of victims who return to their country of origin.

- 9.2.3 There is a wealth of potential information which already exists within the National Referral Mechanism but which is not systematically processed or overseen at a single point. Many working within the system to provide support and services to victims do not know where to go with important information.
- 9.2.4 We have heard a support provider say she had heard the same story from several victims about a man who was regularly bringing three girls at a time through a regional airport but the provider did not know whom to inform.
- 9.2.5 Data, including circumstances about first encounter, the evidence collated from interviews with victims and information given to safe house workers is not systematically collected and collated within a single system from which it can be analysed. We have heard that some Police Services record incidents of trafficking within the crime reporting system but this too is not a consistent practice across the UK.
- 9.2.6 In Cambridgeshire, the police work closely with a range of organisations (see 4.2.4. above). However we have heard of nowhere else using this approach to proactively identify those who may be victims of human trafficking and to prosecute the perpetrators.
- 9.2.7 Denmark has a system to identify perpetrators and to investigate them for those crimes where evidence can be gathered and which is not reliant on the victim being prepared to be a prosecution witness. Perpetrators of the crime of trafficking may also be involved in a variety of crimes including fraudulent claiming of benefits, money laundering, tax evasion and immigration crime and these crimes can be investigated without the need for the victim to testify.
- 9.2.8 The Review has been made aware of the struggles to obtain and share the information required from organisations who should be working together; concerns exist over ownership and sharing data due to the personal nature of the information.
- 9.2.9 Those involved in decision-making report that a great deal of time is spent chasing information. UK Visas and Immigration have said that “...the main

thing that affects our ability to make decisions within 90 days is waiting for third party information (medical and police usually)...”. Service providers and Non-Governmental Organisations have reported that they have problems in identifying who is dealing with cases within UK Visas and Immigration and the police, and that that they are not routinely asked for information to support decision-making.

- 9.2.10 The various organisations involved in the National Referral Mechanism process appear reluctant to trust one another. Some Non-Governmental Organisations have said that they are reluctant to give further information to UK Visas and Immigration for “fear of it being denigrated.” Some support providers admit that they have identified individuals in the National Referral Mechanism who they do not believe to be victims of trafficking but have not shared this information with the Home Office.
- 9.2.11 The proper sharing of information to benefit victims and catch the criminals behind human trafficking is a key responsibility for everyone working in this area; the absence of durable trust between many involved needs to be resolved. Those charged with the governance of those involved, including charity trustees, police crime commissioners and elected Members in local authorities, should assure themselves that their staff are actively cooperating in this area.

9.3 Options

- 9.3.1 We saw that there is only a basic set of data collected at present. Information needs to be collected in such a way that it can be used for intelligence purposes as well as to manage the system efficiently and to provide evidence to allow effective interventions. This should include the capacity to collate data on:
- the location of offences
 - details on the identifier’s role
 - organisation and location of encounter
 - Slavery Safeguarding Lead’s location
 - the primary and secondary exploitation types
 - where victims presented and the circumstances where victims were found (e.g. in situ)
 - the total number of potential victims of trafficking identified (irrespective of their consent to referral)
- 9.3.2 More work needs to be done to ensure that the data and information collected is both appropriate and meaningful.

- 9.3.3 The current system for collating this information is an ineffective way of managing the combination of data and casework with the ability to support intelligence. It might be possible to build onto the new Home Office case working system, but not for two years³³.
- 9.3.4 A Case Tracking and Monitoring System (CTMS) is used by International Justice Mission (IJM), a Non-Governmental Organisation based in Washington DC, with offices around the world, all of which feed in real time individual data into this system to track and monitor individual clients through the rescue, legal and aftercare programmes in which they are involved. We recommend that consideration is given to whether this system would fulfil the requirements.
- 9.3.5 Ownership of this function needs to sit with those administering the National Referral Mechanism and as proposed in 8.4.3 with the case management unit within the Home Office.
- 9.3.6 There is a need for clear and active co-operation with victims even if an individual witness does not lead to a prosecution. Information gathered during the identification process needs to be systematically referred to an intelligence function. This function currently sits with the National Crime Agency and Immigration Enforcement³⁴ in the Home Office.
- 9.3.7 We have heard from many sources that an overall intelligence picture gathered in relation to both adults and children is patchy. Whilst the Police Regional offices and the Regional Organisation Crime Units have a responsibility for collating the regional intelligence picture and the National Crime Agency has a duty to perform a wider criminal intelligence function this work is still in embryonic form. We spoke to Directors of Children's Services who had rarely had any intelligence to help them plan interventions with other agencies in relation to trafficking. We saw little coordinated intelligence-gathering upstream and downstream in relation to UK Visas and Immigration's international operations.
- 9.3.8 An intelligence hub for human trafficking which is well connected and productive in preventing crime and pursuing and supporting prosecutions is needed and seconded intelligence staff embedded with the case work team mentioned at 8.4.3.

33 Due to on-going work to upgrade other existing systems

34 Immigration Enforcement has located intelligence staff in the UK Visas and Immigration national hub to collect intelligence

- 9.3.9 There are three options for where this intelligence unit could sit:
- National Crime Agency – here the information could link into the organised crime picture and can cover British, EEA, non-EEA nationals. The National Crime Agency has a wide ranging remit in terms of the nationality of victims and perpetrators but is constrained by its remit to investigate organised crime.
 - Immigration Enforcement crime directorate – has the powers to deal with criminals relating to non EEA victims and has strong links to the regional airline officer network for overseas disruption. There are significant advantages to Immigration Enforcement taking this work as it has the ability to investigate and prosecute, but it is limited by not covering cases where the victim and perpetrators are British or EEA nationals.
 - The case management unit (8.4.3 above) – with embedded seconded intelligence staff, including analysts, the case management unit could collate and produce intelligence reports which are tasked out to the police or enforcement.
- 9.3.10 We think that further work should be done to define the remit of an intelligence function and whether an existing function could fulfil this role or to identify who is best placed to own this function.

9.4 Recommendations

- 9.4.1 The collection and collation of data must be improved in order to facilitate the progression of cases, the management of the system and to contribute to intelligence where possible.
- 9.4.2 **Data collection capability:** a small investment to be made in IT to support the human trafficking referral mechanism and to manage data in such a way that it can be used to support intelligence gathering.
- 9.4.3 **Appropriate management information:** the collection and production of management information that supports management of the process (e.g. timescales), research on outcomes, and supports comprehensive intelligence gathering.
- 9.4.4 **Data Sharing Protocols:** to put in place data sharing protocols which allow and encourage systematic sharing of information in the victim's best interests. These must include all stakeholders involved in the system e.g. agencies, service providers, immigration enforcement and police.
- 9.4.5 **Co-operation between organisations:** those charged with the governance of those working in areas where human trafficking may be identified, including charity trustees, police crime commissioners and elected Members in local

authorities should assure themselves that their staff are actively co-operating and sharing data appropriately.

- 9.4.6 **Intelligence function:** further work takes place, within the next 6 months, to scope the intelligence function and identify where it should be located and intelligence staff are embedded in the case management unit.

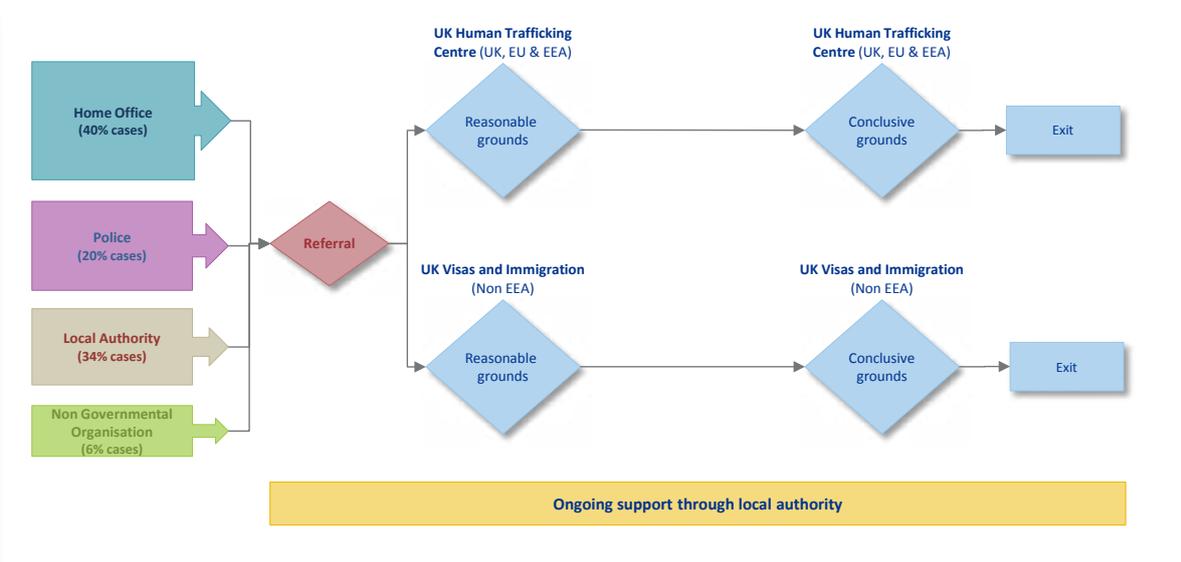
Children and the National Referral Mechanism



10. Children and the National Referral Mechanism

Please note that in this report the word child will be used to refer to children and young people under the age of 18

10.1 Children “as is” process



10.2 Issues

10.2.1 In 2013 22% of referrals into the National Referral Mechanism were children. Currently the National Referral Mechanism process for children mirrors the system for adults and has many similar challenges. There are some key differences:

- Children do not need to give consent to enter the National Referral Mechanism
- Where a child enters the UK unaccompanied the local authority³⁵ where they are identified will be primarily responsible for their care, as a looked-after child
- Where children are from the UK the local authority³⁶ in the area where their needs are identified will be primarily responsible for putting in place

35 In Northern Ireland the Health and Social Care Trust in the area in which the child resides is responsible for their care. In Scotland children’s services plans are drawn up jointly by LA’s and health boards.

36 As above in Northern Ireland the Health and Social Care Trust in the area in which the child resides is responsible for their care. In Scotland children’s services plans are drawn up jointly by LA’s and health boards.

arrangements to safeguard them and promote their welfare.

Crucially, children are vulnerable to exploitation and we owe a particular responsibility to ensuring their effective protection.

- 10.2.2 As with adults there are three main groups of victims, those from within the UK, those from within the EEA (29%) and those children from outside the EEA (54%). Children from outside the UK may have been trafficked into the country and may have already suffered trauma in their home countries before their arrival. Children from outside the EEA may be without a confirmed immigration status and many also have an asylum claim in train.
- 10.2.3 It is unacceptable, but tragically true, that UK children may not always be identified as trafficked as the term is often associated with those who have been trafficked into, rather than around, the UK. Even with low identification of this group, 17% of the children in the National Referral Mechanism are from the UK. The problem of internal trafficking has been highlighted by cases such as Rotherham where large numbers of children were exploited over a number of years 'by multiple perpetrators, trafficked to other towns and cities in the North of England, abducted, beaten and intimidated'.³⁷
- 10.2.4 Children are referred into the system by a First Responder. As with adults the First Responder group is wide and children may be identified by Border Force staff, by a Non-Governmental Organisation, by the police or a social worker, or perhaps when they are claiming asylum. Their cases are considered by UK Visas and Immigration or UK Human Trafficking Centre who make decisions on non-EEA or UK/EEA nationals respectively.
- 10.2.5 The adult support contract does not cover children; rather they are supported through mainstream child care provision administered by Local Authorities. Many organisations have told us that the 45 day reflection and recovery period designated for adults does not have any meaning for children, as the Local Authority should support them before, during and following the process. Support for children who have experienced trafficking will rely on the responsible local authority completing a thorough assessment of the child's needs to inform the actions needed to protect the child.
- 10.2.6 The description of child protection processes relate to England and Wales, there will be some differences in the child protection responsibilities and processes differ across the UK, however the principles remain broadly similar.

³⁷ Independent Enquiry into Child Sexual Exploitation in Rotherham 1997-2013, Alexis Jay OBE.

10.3 Findings

- 10.3.1 It has been estimated that only a small proportion of the real number of trafficked children are being identified due to low awareness the indicators of child trafficking and of the National Referral Mechanism by local authorities and within the police.³⁸,³⁹ Social workers employed in local authority child protection services may not have a specific awareness of human trafficking. Local Authorities⁴⁰ will need to determine how their staff are trained and supervised to respond to this issue, including understanding the function of the NRM⁴¹. In addition, local authorities may not see the benefit of referral to the NRM if children are already in receipt of local authority care.
- 10.3.2 We have heard from many campaigning organisations that in the past, children who were identified in criminal activity such as cannabis growing were likely to be arrested and prosecuted rather than identified as victims.⁴² Awareness of how children are used by criminals is increasing. However, there are still serious concerns that these victims are more likely to be seen as criminals by the police. It is essential that police and the local authorities' youth offending services recognise these young people as children in need of protection, rather than as offenders, and involve children's services as soon as possible in identifying solutions for providing them with care and support.
- 10.3.3 The Department for Education issued revised statutory guidance on the *Care of unaccompanied and trafficked children* in July 2014,⁴³,⁴⁴ which includes a requirement for social workers, or other front line professionals, to refer cases to the National Referral Mechanism where there are reasonable grounds for believing children have been trafficked.
- 10.3.4 Although there are many excellent and dedicated First Responders who will identify victims and ensure they offer appropriate support, there are many more that do not have adequate training and expertise. We have seen several examples of potential child victims of trafficking who have crossed the paths of

38 CFAB - this is based on awareness levels on training courses they have run with around 75 Local Authorities where less than 10% of social workers (on average) would have heard of the National Referral Mechanism.

39 Many Local Authorities will acknowledge that awareness of the National Referral Mechanism is low -ACDCS

40 In NI the Health & Social Care Board has provided training for Trust staff in relation to trafficked children and age assessment.

41 In Scotland, the Child Protection Committees lead on the development, publication and implementation of interagency guidance and procedures for child protection, including trafficking issues.

42 Case studies discussed at meetings with Refuge and Refugee Council; and with the Poppy project

43 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/330787/Care_of_unaccompanied_and_trafficked_children.pdf

44 The Department of Health, Social Services and Public Safety and the PSNI issued "Working Arrangements for the Welfare and Safeguarding of Child Victims /Suspected Victims of Human Trafficking in February 2011. In Scotland, the position is set out in Scottish Government " Inter-Agency Guidance For Child Trafficking - Child Trafficking Assessment National Referral Mechanism" November 2013 and the National Guidance on Child Protection in Scotland 2014.

several First Responders without the indicators of trafficking being identified and those young people are not then referred into the National Referral Mechanism.



- 10.3.5 One example was of a 15 year old girl, exploited both on the way to the UK and within the UK, who was seen by social services, asylum services and the police before indicators were picked up by her carer.⁴⁵ Another example was of a UK child⁴⁶, who repeatedly went missing and suffered trafficking and exploitation. Her behaviour was described by one key worker as ‘a lifestyle choice’.
- 10.3.6 Human trafficking is not on the curriculum for social work qualifications, and training and awareness is varied and patchy for front line staff. Hillingdon Social Services have, because of Heathrow Airport, a great deal of experience with trafficked children and therefore are well trained in spotting the indicators, but this awareness varies from area to area. The review identified variable, inconsistent practice by local authority children’s services. Local authorities are legally responsible for safeguarding and promoting the welfare of all children in their areas. Therefore, whichever local authority is responsible, trafficked children, like adults, should be offered an assessment of their needs, leading to an effective plan to provide them with care and support.
- 10.3.7 Concerns have been expressed by several organisations⁴⁷ that indicators of trafficking are not always picked up and therefore appropriate safeguarding measures have not been put in place. Guidance⁴⁸ has been produced but it is clear that more needs to be done to ensure that these vulnerable children are protected.
- 10.3.8 The risk of a child going missing is high, particularly in the first 48 hours of a child coming into care⁴⁹. It is estimated that 60 per cent of trafficked children in local authority care go missing.⁵⁰ In 2013, 8% of children’s cases were ‘suspended’ from the National Referral Mechanism; this is likely to be because the child was missing from care during the progression of their case. If a child goes missing it may be very difficult to identify them if and when they reappear.
- 10.3.9 We have heard from many sources, serious concern about children going missing from care and we are deeply troubled about this. Many other published reports have similarly expressed concerns. Guidance is explicit about the reporting and action required but we see little evidence of tangible improvements.

45 Case study from Refugee council.

46 Anonymously given by police

47 ASU, NWG Network, NSPCC, BAOBAB

48 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/330787/Care_of_unaccompanied_and_trafficked_children.pdf

49 Office of the Children’s Commissioner

50 House of Commons, Home Affairs Committee (2009) *The Trade in Human Beings: Human Trafficking in the UK*, Sixth Report of Session 2008–09, Volume 1, London: House of Commons

10.3.10 Frequent absences may also be an indicator that the child has been trafficked and we have heard many children are under immense pressure to return to their traffickers because of threats and coercion. They may believe that they or their families are danger; they may have been exploited through the use of juju or witchcraft or they may be emotionally manipulated.

“We understand why children go missing from care – it is not surprising given the coercion techniques used by their traffickers. We should look at the children who remain in care and look at the types of cases, the settings they are placed in to see what is working” (NWG Network).

10.3.11 We have heard that there is sparse specialised mental health provision for child victims of trafficking and waiting lists are long. A recent report - *Child and Adolescent Mental Health Services Benchmarking Report* (December 2013) shows that waiting times have been increasing in recent years. Trafficked children are often victims of emotional trauma, manipulation, sexual exploitation and abuse. Specialised services are an important component in recovery.

10.3.12 We also heard and appreciate that waiting a long time for a decision on their trafficking case has an impact on children’s emotional well-being due to stress and the fear of not being believed. We appreciate the importance of allowing abused children to tell of their experiences in their own time to a trusted adult with whom they have built a relationship.

10.3.13 The long term impact of exploitation and abuse on children cannot be underestimated and it is vital that appropriate support is available to them. As stated in the Rotherham report ‘The impact of sexual exploitation on the lives of young victims has been absolutely devastating, not just when they were being abused, but for many years afterwards.’⁵¹

10.3.14 The area of decision-making has provoked much debate. The issue of the conflation with asylum decisions, timeframes, the complexity of the system and the thresholds for decision-making are all addressed earlier in the report (7.4).

10.3.15 There are additional concerns for child victims of trafficking; for example children may have more challenges with the telling of their experiences. They may be unable to talk about the experiences until they have established a relationship of trust with an adult.⁵² It has been stated by several organisations with whom we have spoken, that decision makers should have child protection expertise⁵³.

51 Independent Enquiry into Child Sexual Exploitation in Rotherham 1997-2013, Alexis Jay OBE.

52 Proposal for a revised National Referral Mechanism for children, The Anti Trafficking Monitoring Group, August 2014. NSPCC report: Breaking the walls of silence, pg 9

53 This view was widely held at the Workshop on children’s issues in July 2014.

It has also been suggested that the language of decision letters could be made more child friendly⁵⁴.

- 10.3.16 Some organisations have expressed concerns that decisions are not always made on the basis of the age of the victim when they were trafficked. This is concerning as if the victim was a child at the point they were trafficked the decision should be made on that basis.
- 10.3.17 Across the UK there are established systems for child protection, with specific time lines and processes. It has been suggested by several agencies that it would be sensible to align these processes to reduce the complexity of two concurrent systems. In addition the child often has to repeat their story to several people from the various organisations involved in their care, they might have to speak to a social worker, police, legal representatives, health professionals, asylum case workers and so on. Anything that can be done to reduce this repetition would be helpful to the child⁵⁵.
- 10.3.18 If a child is considered to be at risk of serious harm, there is a specific process within the local authority of assessment, safeguarding, investigation and planning for the child under the Children Act 1989⁵⁶. Where there are concerns that a child is at risk of serious harm the local authority must convene an initial child protection conference. This conference brings together family members (and the child where appropriate), with professionals to make decisions about the child's future safety, health and development. The conference will result in an outline child protection plan.
- 10.3.19 If a child is unaccompanied, they will become looked after and social workers are responsible for assessing their needs and for drawing up a care plan within 10 working days. Care plans are reviewed regularly with all relevant parties⁵⁷. Systems such as these could be used to collect information and evidence about the child's trafficking in order to reduce the number of times and people to whom the child has to disclose information regarding their trafficking.

54 Discussed at the case working workshop, and at meeting with NWG Network

55 NSPCC report: Breaking the walls of silence. http://www.nspcc.org.uk/Inform/research/findings/breaking_the_wall_of_silence_report_wdf66135.pdf

56 In Northern Ireland the relevant legislation is the Children (NI) Order 1995, in Scotland the relevant legislation is the Children (Scotland) Act 1995.

57 After 20 working days, three months and six monthly thereafter. Reviews can be brought forward

10.4 Options

- 10.4.1 Clearly for children, as for adults, a greater awareness of the indicators of trafficking, alongside more detailed and specialised knowledge, is essential for professionals responsible for safeguarding and promoting the welfare of children.
- 10.4.2 In England and Wales local authorities are legally responsible for safeguarding children in their areas⁵⁸. It is vital that these organisations are aware of the indicators for trafficked children and how to respond if they identify a child who may have been trafficked. Local Safeguarding Children Boards⁵⁹ are focused on developing strategic responses to local issues. They organise training for frontline organisations and agree local strategies on safeguarding; the participating organisations are then responsible for delivering these. It has been suggested by several organisations that they would be the most effective bodies through which to target guidance on training and local support for those affected by human trafficking. The review believes that the Chairs of Local Safeguarding Children’s Boards should have as one of their strategic objectives, to ensure trafficking is regularly considered at their meetings.
- 10.4.3 As with adults, children will need varying levels of support dependent on their needs. One size does not fit all.
- 10.4.4 Trafficked children will require access to a range of options to provide them with accommodation and support, some children may require highly specialised residential care where they can be offered therapeutic help; others may benefit from more mainstream foster care; internally trafficked children may benefit from family support services focused on keeping them safe at home. Barnardo’s was funded by the Department for Education to run a two year pilot scheme to provide safe accommodation for sexually exploited and trafficked children. Whilst this was a small sample, the evaluation has shown that where placements are offered in line with the model suggested in the full evaluation report, sexually exploited and/or trafficked young people can be protected effectively and can continue to go on to recover from abuse.⁶⁰
- 10.4.5 Several organisations have also talked to us about the need for a durable solution for the child in relation to their right to remain in the UK. 53% of children within

⁵⁸ Health and Social care trusts in NI. In Scotland children’s services plans are drawn up jointly by LA’s and health boards.

⁵⁹ In Scotland and Northern Ireland there are equivalent arrangements.

⁶⁰ http://www.barnardos.org.uk/resources/research_and_publications/evaluation-of-barnardos-safe-accommodation-project-for-sexually-exploited-and-trafficked-young-people/publication-view.jsp?pid=PUB-2340

the National Referral Mechanism are from outside the EEA⁶¹. These children are often unaccompanied, without a confirmed immigration status. In general, an asylum application is made for any looked after child who requires a decision on their immigration status although we see no reason why that should be the case. Social workers and children's legal representatives should consider whether such an application is appropriate and in the child's long term interests. If the child does not qualify for asylum, the Home Office will consider whether to grant leave until the age of 17½. In practice, very few children are refused what is referred to as UASC⁶² leave. This may lead to uncertainty in the short term and further anxiety as young people approach the end of their period of temporary leave. Barnado's state 'Our experience is that some children may return to their traffickers at 18 as a result of this uncertainty.'

- 10.4.6 It has also been suggested that more could be done to reunite children with their families. CFAB (Children and Families Across Borders) states that there is a better chance of reuniting children with their immediate or extended family at an early stage as the links are still there – after several years it will be harder to find remaining family members. We concur with this view very strongly: much more should be done to re-unite children with their families where it is safe to do so, although we understand that this is rarely straightforward. More should be done where that is not possible, to work with social care agencies of the state from which the child was trafficked, to ensure a return to their culture and country of origin in a timely manner.
- 10.4.7 Some children may be dealing with a number of issues concurrently in addition to recovering from their trauma; pursuing an asylum application, giving evidence in respect of criminal proceedings, or they may have a criminal case against them. Several organisations have called for a system of independent child advocates to ensure that children are able to receive appropriate support. The Government are currently trialling this approach and there is a well developed mechanism funded by the Scottish Government.
- 10.4.8 It has been suggested that a body with experience of safeguarding would be better placed to make the trafficking decision, for example a multi-agency system within the Local Authorities (e.g. MASH - Multi Agency Safeguarding Hub or Local Safeguarding Children Boards)⁶³. However, these are strategic and planning bodies bringing together a range of partner organisations within a local authority area. They do not have legal accountability for service delivery.

61 UASC - unaccompanied asylum seeking child

62 UASC - unaccompanied asylum seeking child

63 Proposal for a revised National Referral Mechanism for children, The Anti Trafficking Monitoring Group, August 2014

- 10.4.9 Local Safeguarding Children Boards (LSCBs) do not have accountability for managing individual cases. They may organise training for frontline organisations, and will agree local multi-agency safeguarding strategies. They could be very useful organisations for promoting training and awareness of trafficking issues. A system that mirrors the adult system (described in section 11.1) would work well for children. We believe it appropriate for one of the panels (see see 7.4) to develop expertise on children who have been trafficked and who could advise other panels as required.
- 10.4.10 Given that access to support and services for children is not dependent on referral into the National Referral Mechanism their referral does not need to be made immediately but at an appropriate point when the child is safe and the Slavery Safeguarding Lead has been able to collect the relevant information. Children tell their stories in their own time. We believe it appropriate to align the review process for the National Referral Mechanism with the review process built in to the child protection systems at three months, which would give all those working with the child time to investigate the issue.

10.5 Recommendations

- 10.5.1 These recommendations relate to England and Wales, they will need amending to reflect the child protection systems, structures, processes and timelines in Scotland and Northern Ireland.
- 10.5.2 The Department for Education should work with the Association of Independent Local Safeguarding Children Boards Chairs to ensure that they are aware of the importance of the identification and support of child victims of slavery and trafficking. Chairs of Local Safeguarding Children Boards should ensure that trafficking is regularly considered at their meetings, and direct the Board members towards any packages which they could make available to persons who work with children affected by trafficking and/or slavery. See recommendations on raising awareness in section 4.4.
- 10.5.3 Local Authorities to be aware of the appropriate support and safeguarding measures necessary for trafficked children as a result of their additional vulnerabilities. The issue of missing children is key and additional methods such as DNA or biometric data collection should be considered, taking into account the sensitivity of undertaking such approaches with children.
- 10.5.4 Those involved in supporting and advising children to consider very carefully whether it is appropriate to apply for permanent immigration status and should

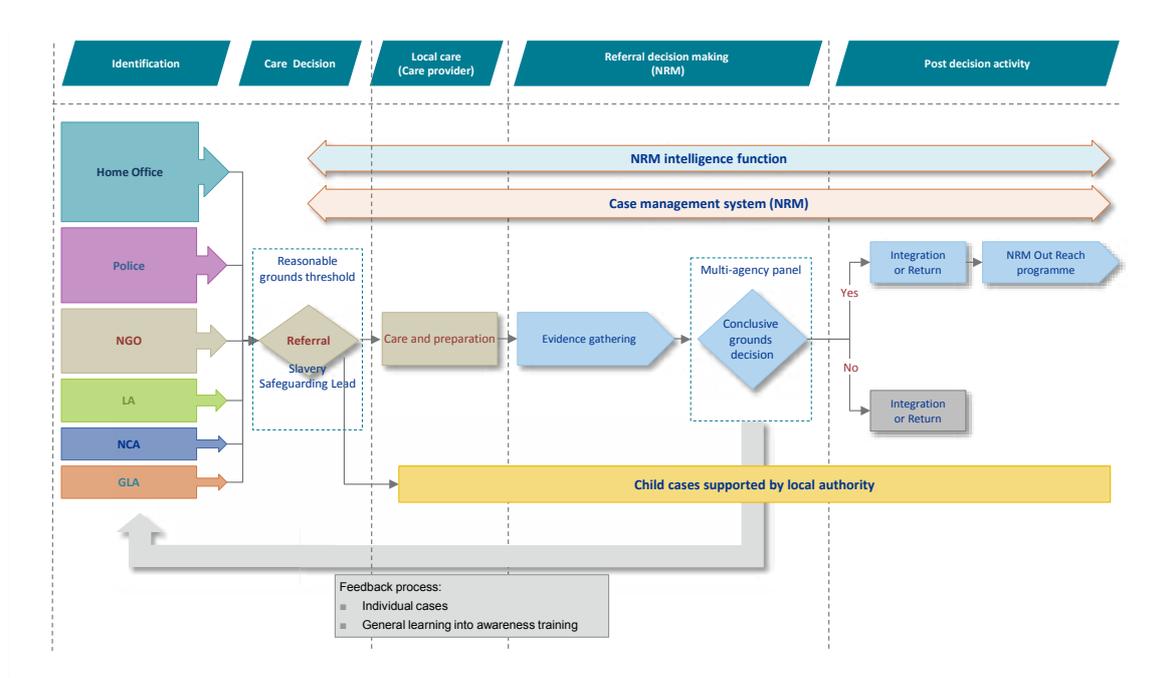
always consider the option of safely returning children to family members in their home country or the state authorities from that country.

- 10.5.5 The process for children is to mirror that for adults⁶⁴. Child protection system timelines should be taken into account within the process of referral and decision-making. Child-friendly language should be used when communicating outcomes from panels.

⁶⁴ The process for children should follow the process for adults including:

- Referral by a Slavery Safeguarding Lead
- Multi-disciplinary panels with child specific expertise
- A single case management unit
- Asylum and trafficking decisions are made separately

11. Summary and Next Steps



11.1 Proposed system

- 11.1.1 Given what we have learnt we put forward recommendations to create a different process from the one which currently exists and to provide a process in which a victim will see key differences.
- 11.1.2 The proposed system involves trained and accredited Slavery Safeguarding Leads, who will refer cases to a single case management unit, with a multi-agency panel making the trafficking decision within agreed time lines.
- 11.1.3 Advice and calculations from Home Office finance colleagues shows that the cost of the proposed system is no more than the cost of the existing system. This takes into account the cost of running UK Human Trafficking Centre, UK Visas and Immigration Hub and the cost of the support contract. The proposed system takes account of a case management team administering panels for which the panel chairs will be paid a small fee, removing the reasonable grounds decision, shortening timescales for decision-making and thus the time on support but adding cost for a wider range of support.

11.2 Next steps

- 11.2.1 An implementation plan should be produced which will show how agreed recommendations can be translated into action and the steps to achieving the new system. This will include, if agreed, testing the decision-making panels in one or two locations and developing a process to introduce in those test areas, Slavery Safeguarding Leads.

Acknowledgements

I would like to record some particular thanks. People within and running the three devolved administrations have been open, tolerant of our questions and rightly proud of their particular services. The Salvation Army, and especially Ann-Marie Douglas, has been willing to explain, show and answer our questions. The staff at the UKVI centre in Leeds and colleagues at the NCA and UKHTC have been responsive, thoughtful and willing throughout, as have many other Home Office colleagues and staff from other Government Departments. Parliamentarians have been equally engaged and helpful in testing our thinking against political realities. Staff at KPMG have been prepared, without cost, to roll their sleeves up and help us, challenge us, and endorse our work as needed. Price Waterhouse Coopers offered us their London boardroom for two workshops for stakeholders without charge. Every voluntary sector organisation has been open and challenging, thoughtful and considerate and their engagement with us has been very much appreciated.

Annex A

Organisations and departments engaged in the review

Aberlour

Anti Trafficking Monitoring Group

Ashiana Sheffield

Association Directors of Children's Services

Association of Police and Crime Commissioners

Asylum Aid

Baobab Centre

Barnardo's

Belfast and Lisburn Women's Aid Federation, Northern Ireland

Birmingham City Council

Cambridgeshire Police

Canadian Immigration Service

CARE

Care Quality Commission

Child Exploitation and Online Protection

Children and Families across Borders

Children's Society

City Hearts Sheffield

Co-ordinated Action Against Domestic Abuse

Counter Human Trafficking Bureau

Crown Prosecution Service

Croydon Council

CSJ working group

Devon and Cornwall Police

Directors of Adult Social Services

Eaves/Poppy Project

ECPAT
FLEX – Focus on Labour Exploitation
Gangmaster Licensing Authority
Gloucestershire Police
Greater London Authority
Helen Bamber Foundation
Hestia
Hillingdon Safeguarding Team, Hillingdon Council
HM Chief Inspector of Prisons
Human Trafficking Foundation Advisory Forum
Immigration Law Practice Association
International Organisation for Migration
Just Enough UK
Kalayaan
Kent Police
London Government Association
Medaille Trust
Metropolitan Police
Metropolitan Police Trafficking Unit
Migrant Help
National Crime Agency
NHS England
NSPCC
NWG Network
Palm Cove Society
Red Cross
Refuge
Refugee Council
Royal Canadian Mounted Police
Salvation Army
Snowdrop
TARA

Thames Valley Police
Thames Reach
The Children's Society
UK Human Trafficking Centre
UNICEF
Unseen
Walk Free
Walthamstow Refugee Support Psychology Service
Wiltshire Police
Woman's Aid
West Midlands Regional Anti-Trafficking Network

Individuals engaged in the review

Adi Cooper – Association of Directors of Adult Social Services
Anthony Steen – Human Trafficking Foundation
Baroness Butler Sloss
David Ford – Minister for Justice Northern Ireland
David Pearson – President of Association of Directors of Adult Social Services
Jenny Marra – Scottish Parliament
John Vine – Chief Inspector
Lord Bishop of Derby
Lord Warner
Lucy Maule – Centre for Social Justice
Rt Hon Frank Field
Rt Hon Sir John Randall
Sandie Keane – Former President of Association of Directors of Adult Social Services/Leeds City Council
Shaun Sawyer – ACPO Lead on Human Trafficking and Chief Constable Devon and Cornwall

Individuals engaged in the review in relation to children:

Andrew Webb – Former President Association of Children's Services and Director of Services for People at Stockport Council
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Keith Towler - Children's Commissioner for Wales

Maggie Atkinson – Children's Commissioner for England

Patricia Lewsey-Mooney – Children's Commissioner Northern Ireland

Professor Ravi Kohli, Professor of Child Welfare, University of Bedfordshire

Tam Baillie – Scotland's Commissioner for Children and Young People

Individuals engaged in the review in relation to health:

Cathy Zimmerman – Researcher

Cornelius Katona - Psychiatrist

Fiona Lothian – Sheffield Women's Counselling and Therapy Service

Jane Herlihy – Centre for the Study of Emotion and Law

Jean Cumming – Chief Executive, Crisis Counselling

Noreen Tehrani – Clinical psychologist

Sian Oram – Researcher

Government Departments:

Department for Business Innovation and Skills

Department for Communities and Local Government

Department for Education

Department of Health

Department for Work and Pensions

HM Revenue and Customs

Ministry of Justice

Scotland:

COSLA Migration, Population and Diversity Glasgow

Police Scotland

Glasgow City Council

EHRC Scotland

Legal Services Agency Scotland, Women and Young Persons' Department

Migrant Help

NRM lead UK Visas and Immigration Glasgow

Procurator Fiscal depute, policy division COPFS, Scotland
 Scottish Government Criminal Law and Licensing Division
 Scottish Government Justice Department
 Scottish Guardianship Service
 TARA, Scotland
 Scotland's Commissioner for Children and Young People's office
 University of Stirling

Northern Ireland:

Amnesty International, Northern Ireland
 Belfast and Lisburn Women's Aid
 CARE, Northern Ireland
 Crime Reduction Branch Community Safety Unit, Northern Ireland
 Department for Employment and Learning, Northern Ireland
 Department for Justice Human Trafficking Team, Northern Ireland
 Department of Health, Social Services and Public Safety, Northern Ireland
 Evangelical Alliance, Northern Ireland
 Freedom Acts, Northern Ireland
 Health and Social Care, Northern Ireland
 Invisible Traffick, Northern Ireland
 Law Centre Northern Ireland
 Migrant Help, Northern Ireland
 National Union of Students, Northern Ireland
 Northern Ireland Council for Ethnic Minorities
 Northern Ireland Prison Service
 NSPCC, Northern Ireland
 Police Service NI
 Regional Adult Safeguarding Officer, Health and Social Care Board, Northern Ireland
 South Tyrone Empowerment Programme
 Northern Ireland Assembly Committee for Justice
 Northern Ireland Council for Ethnic Minorities
 Northern Ireland Department of Justice

Wales:

BAWSO, Wales

Exploitation Officer Safer Wales Ltd

Mwenya Chimba - Director for Violence against Women

New Pathways, Wales

Gwent Police

South Wales Police

Partnership Manager Cardiff Council

Safer Wales Ltd

Stephen Chapman – Welsh Government Anti-Slavery Coordinator

UK Visas and Immigration and Immigration Enforcement Wales

WLGA

Intergovernmental Consultation:

Australia - Department of Immigration and Border Protection

Denmark - Ministry of Justice

Finland – Ministry of the Interior, Migration Department

Germany - Federal Ministry of the Interior

Norwegian Ministry of Justice and Public Security

Sweden -Ministry of Justice

US – Citizen and Immigration Services

Home Office Departments:

Border Force

Border Force, Gatwick Minors Team

UK Visas and Immigration, Appeals and Litigation Directorate

Immigration Enforcement

Immigration Enforcement, Immigration Crime

Safeguarding Unit

Modern Slavery Unit

Office of the Children's Champion

UK Visas and Immigration, Asylum Screening Unit

UK Visas and Immigration, AVR team

UK Visas and Immigration, Human Trafficking Hub

