



Home Office

National Referral Mechanism: guidance for child first responders

Version 2

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About this guidance

This guidance is aimed at first responders who identify potential child trafficking and child slavery victims in the UK.

First Responders are specified statutory authorities and non-governmental organisations who have a responsibility to identify potential victims and refer cases to the UK Human Trafficking Centre (UKHTC) Competent Authority of the NRM.

It should be read with:

- [Victims of Modern Slavery: Competent Authority guidance](#)
- [Victims of modern slavery – frontline staff guidance](#)

Modern slavery, including child trafficking, is child abuse.

When an agency comes into contact with a child who may have been exploited or trafficked, Local Authority Children's Services and the police should be notified immediately. A referral into the NRM does not replace or supersede established child protection processes, which should continue in tandem.

All children, irrespective of their immigration status, are entitled to safeguarding and protection under the law. Referrals to the NRM should be for all potential victims of trafficking and modern slavery, who can be of any nationality, and may for example include British national children, such as those trafficked for child sexual exploitation or those trafficked as drug carriers internally in the UK.

Contacts

If you have any questions about the guidance and your line manager or senior caseworker cannot help you or you think that the guidance has factual errors then email Asylum strategy and trafficking team at Asylum Policy.

If you notice any formatting errors in this guidance (broken links, spelling mistakes and so on) or have any comments about the layout or navigability of the guidance then you can email Guidance – making changes.

Clearance

Below is information on when this version of the guidance was cleared:

- version 2
- published for Home Office staff and other frontline staff on 21 March 2016

Official – sensitive: start of section

This information has been removed as it is restricted for internal Home Office use.

Changes from last version of this guidance

- updated to reflect changes to the NRM on modern slavery
- updated on the NRM pilot scheme
- updated to reference the new duty to notify
- updated on the presumption of age
- clarification that all children identified as potential victims of modern slavery should be referred to the NRM
- updated to include revised guidance on police referrals

Related content

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Related external links

What is the Council of Europe Convention?

The Council of Europe Convention on Action against Trafficking in Human Beings is a comprehensive treaty focusing mainly on the protection of victims of trafficking and the safeguarding of their rights. It also aims to prevent trafficking and to prosecute traffickers.

The UK government signed the Council of Europe Convention on Action against Trafficking in Human Beings on 23 March 2007. The Convention was ratified by the UK on 17 December 2008, and came into force on 1 April 2009.

The Council of Europe Convention on Action against Trafficking in Human Beings defines trafficking in human beings as:

the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs

Any child who is recruited, transported, transferred, harboured or received for the purposes of exploitation is considered to be a trafficking victim, whether or not they have been forced or deceived. Even when a child appears to have submitted willingly to what they believe to be the will of their parents or accompanying adults, it is not considered possible for a child to give informed consent.

A potential victim of modern slavery is a potential victim of a crime.

The Modern Slavery Act 2015 contains 2 main modern slavery offences, punishable by up to life imprisonment:

- slavery, servitude and forced or compulsory labour
- human trafficking

The Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 also established new offences of human trafficking and slavery, servitude and forced or compulsory labour, punishable by up to life imprisonment.

The Human Trafficking and Exploitation (Scotland) Act was passed by the Scottish Parliament on 1 October 2015.

What is the National Referral Mechanism?

The Council of Europe Convention on Action against Trafficking in Human Beings requires the UK to take a victim centred approach to tackling all types of trafficking. Human trafficking is a criminal offence and may be linked to organised crime. One of the primary principles of the UK's approach to tackling human trafficking is to provide services to help victims recover and access justice.

As part of implementing the Convention, the government created the National Referral Mechanism (NRM) in 2009.

The NRM is a victim identification and support process which is designed to make it easier for all the different agencies that could be involved in a trafficking and now modern slavery case – eg police, Home Office UK Visas and Immigration Directorate, local authorities, Health and Social Care (HSC) Trust in Northern Ireland, and non-governmental organisations (NGOs) – to co-operate, to share information about potential victims and facilitate their access to advice, accommodation and support.

The Modern Slavery Act received royal assent on 26 March 2015 since which time the majority of provisions in that Act have come into force in England and Wales. This includes a number of provisions extending existing support for victims of human trafficking to victims of slavery, servitude and forced and compulsory labour.

In 2014, the Home Secretary committed to extending the support offered through the NRM, including accommodation and subsistence, to victims of all forms of modern slavery.

This change in the NRM for supporting cases identified in England and Wales came into force on 31 July 2015. In Scotland and Northern Ireland, however, only trafficking cases (rather than all modern slavery cases) are processed through the NRM.

The Human Trafficking and Exploitation (Scotland) Act was passed by the Scottish Parliament on 1 October 2015.

Victims of slavery, servitude and forced and compulsory labour who are conclusively recognised as such by the NRM will be eligible for discretionary leave based on the same criteria as victims of human trafficking, and this provision applies across the UK.

National referral mechanism (NRM) review and pilots

This section tells you about the NRM review and pilots.

The [interim review of the national referral mechanism for victims of human trafficking](#) was published on 11 November 2014 and recommended that the support system for identifying and supporting victims of people trafficking should be overhauled.

The key recommendations of the report include:

- extending the NRM to cover all adult victims of modern slavery
- strengthening the first responder role – the point when potential victims are first identified and referred by creating new anti-slavery safeguarding leads, supported by increased training and feedback
- streamlining the referral process by removing the ‘reasonable grounds’ decision once the successful implementation of accredited slavery safeguarding leads has occurred – allowing direct referral to specialist support for potential victims
- establishing new multi-disciplinary panels, headed by an independent chair, with a view to ceasing the sole decision making roles of UKVI and the UK human trafficking centre (UKHTC)
- creating a single caseworking unit within the Home Office to replace the current caseworking units in the National Crime Agency and UK Visas and Immigration

The Home Secretary welcomed the findings of this report, which acknowledges that there is no simple, one size fits all approach. She stated that she would carefully consider all of the recommendations and set out the government’s response in the Home Office’s Strategy on modern slavery, which was published on 28 November 2014.

Future changes to the NRM

Changes to the NRM (in light of the review report above) are being piloted in West Yorkshire police force area and the South West (Avon and Somerset, Devon and Cornwall, Dorset, Wiltshire and Gloucestershire police force areas) from 31 July 2015. If you are dealing with a case from these areas you must refer to the relevant guidance for the pilot.

What do frontline staff need to know about the pilot? (Cases identified in West Yorkshire and South West England only)

Frontline staff will need to continue to identify potential victims of modern slavery in the 2 pilot areas of West Yorkshire and the South West of England. The non-pilot process will continue to operate in the rest of the UK.

In pilot regions, Slavery Safeguarding Leads (SSLs) will be responsible for the reasonable grounds decision in pilot cases. From November 2015, instead of sending the referral form to the UKHTC, frontline staff need to send it to a SSL in pilot cases.

The SSL will make the reasonable grounds decision and refer the potential victim in pilot cases for support if appropriate, including accommodation, but frontline staff should still arrange emergency medical treatment and/or emergency police assistance where appropriate.

In pilot cases involving potential child victims, the local authority will be notified by frontline staff. The SSL should confirm that this has been done.

New multi-disciplinary panels have replaced the UKHTC and UKVI competent authority in pilot areas and make the conclusive grounds decision on whether the person is a victim of modern slavery. They are supported by a new case management unit who might contact frontline staff for further information.

The Home Office will continue to take any relevant immigration and asylum decisions in pilot and non pilot cases.

Contact details of SSLs in each location are being collated.

If you are unsure whether a location is within the pilot locations, you can check the postcode or place name of a police force area on the [police website](#).

Which cases fall into the NRM pilot?

Cases will be referred to the NRM pilot via SSLs where either the frontline worker or the potential victim is located in one of the 2 pilot regions at the point of referral.

Scenario	Pilot case?
Potential victim has been physically encountered by a frontline worker within one of the pilot regions.	Yes.
Potential victim has had case referred to a frontline worker within the pilot region. The frontline worker has not physically encountered the potential victim, who is located outside of the pilot region (eg Leeds asylum hub), but is the first frontline worker to identify the person as a potential victim.	Yes.

Scenario	Pilot case?
Potential victim is physically located in one of the pilot regions. They are identified by a frontline worker with responsibilities for the pilot area, who is physically located outside of the pilot area (eg the Salvation Army helpline based in Birmingham, the Cardiff asylum hub which is responsible for the South West).	Yes - in these cases referral must still be made via an SSL within the pilot regions, not UKHTC.
Individual encounters frontline worker in the pilot region, but then leaves the area and is identified as a potential victim by another frontline worker, also not in the pilot area (eg potential victim encounters the police in pilot area but NRM referral is not made, they leave the area and then claim asylum outside of the pilot areas when the NRM referral is made).	No – the referral is made to UKHTC using non pilot process. The SSL is not involved.

Exclusions from the pilot process

Cases that are within immigration detention, the prison estate, or that are being managed by Home Office Criminal Caseworking Directorate will be excluded from the pilots. They should be referred to UKHTC and will continue to be managed by existing competent authorities within the Home Office.

Related content

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What is a first responder?

In principle, all agencies and organisations who find themselves with grounds for concern that a person may be a victim of modern slavery have a responsibility for identifying the person as a possible victim and putting them in touch with the responsible authorities and support providers.

Only organisations classed as first responders can refer a potential victim of modern slavery into the NRM in non pilot cases. Anyone outside the NRM who wishes to raise modern slavery concerns can do so through a first responder. For children, a formal referral to the NRM is made by a first responder. First responders are:

- the Home Office
- local authorities Children Services and designated persons within Safeguarding Children Boards (Child Protection Committees in Scotland)
- Health and Social Care Trusts (HSC Trusts)
- Police
- POPPY Project
- National Crime Agency (NCA)
- Trafficking Awareness Raising Alliance (TARA)
- Migrant Help
- Kalayaan
- Gangmasters Licensing Agency
- Medaille Trust
- Salvation Army
- Barnardo's
- National Society for the Prevention of Cruelty to Children (NSPCC).
- Unseen UK
- New Pathways
- BAWSO
- Refugee Council

What is a competent authority?

If you identify a potential victim of modern slavery, frontline staff (also called first responders) must refer them to the NRM to be considered by a competent authority. Only trained specialists in the UK's designated competent authorities can decide who is actually a victim of modern slavery or trafficking.

For the purposes of the non pilot NRM process the UK Human Trafficking Centre (UKHTC) within the National Crime Agency (NCA) and the Home Office are the UK's 2 designated competent authority decision makers under the NRM.

The UKHTC competent authority deals with cases referred by all external agencies such as the police, local authorities etc where the person is a UK or EEA national, or where there is an immigration issue but the person is not yet known to the Home Office. The Home Office UK Visas and Immigration Directorate, deals with cases where modern slavery is raised as part of an asylum claim or in the context of another immigration process.

Referral to children services

If you identify a child as a potential victim of modern slavery, first responders who are not part of a Children's Services department should ensure a referral is immediately made to their Local Authority Children's Services (references in this document to Children's Services should be read as Social Services in Wales and HSC in Northern Ireland).

This is because responsibility for the care, protection and accommodation of child trafficking victims from the UK and abroad falls to local authorities under the 1989 and 2004 Children Acts.

This is to ensure that local authorities/HSC Trust are aware of the child and can put in place any necessary measures to safeguard the minor.

The police should be made aware that a potential crime has been committed. See [referral to police](#).

Home Office first responders who identify a child as a potential victim of modern slavery must complete a referral to child welfare services form.

When you complete the welfare services form, you must:

- highlight the signs of modern slavery and confirm you will refer the case to the NRM
- take a copy of the completed form (send this to the competent authority when you make the NRM referral)
- send the completed form to the relevant local authority

Other first responders should ensure that similar information as above is provided to the local authority.

Through the Children and Young People (Scotland) Act each child in Scotland will have a named person and public bodies will have a duty to share information with the named person.

Establishing age

In some cases a person referred to the NRM may claim to be a child but it is suspected that they are an adult.

It is sometimes difficult to establish the age of a potential child trafficking or modern slavery victim where there is a dispute over age. In such cases the competent authority and other agencies within the NRM will continue to treat the individual as a child until age is established.

Where there is an age dispute and an age assessment is being undertaken, referral to the NRM should not be delayed where the victim is believed to be a child. The child's welfare is the most important factor and should always take precedence.

However, whether an individual is a child or an adult must be established before the competent authority reaches its conclusive grounds decision. The first responder should commission an age assessment where appropriate – see assessing the age of a potential child modern slavery victim.

On 15 October 2015, the government commenced the 'Presumption about Age' provision (section 51) in the Modern Slavery Act 2015 for child victims of trafficking in England and Wales.

This provision ensures that in cases where there is uncertainty over the age of a victim, but whom authorities believe to be under 18, that authorities should assume that the victim is under 18, until an age assessment takes place by the local authority. The government has however not issued any new statutory guidance or regulations in relation to the relevant arrangements on providing support and assistance. In the interim existing statutory guidance on supporting unaccompanied asylum seeking and trafficked children and guidance on the National Referral Mechanism, which has been updated, remains in force.

Where an age assessment has been conducted by the local authority and has determined that the potential victim is an adult, the competent authority must seek consent from the potential victim to remain in the NRM before the case is progressed any further.

It may be the case that the potential victim challenges the outcome of an age assessment. The competent authority must accept the determination of the local authority until such time as any challenge is concluded.

Referral to police

A potential child victim of modern slavery is a potential victim of a crime. All cases involving children should be referred to the police.

The Modern Slavery Act 2015 contains 2 main modern slavery offences punishable by up to life imprisonment:

- slavery, servitude and forced or compulsory labour
- human trafficking

The Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 also established new offences of human trafficking and slavery, servitude and forced or compulsory labour, punishable by up to life imprisonment.

Staff in the competent authority must refer all allegations to either:

- the local police force where the alleged exploitation took place
- the National Human Trafficking Unit (in Scotland)
- a Home Office criminal and financial investigations team (which includes seconded police officers) as appropriate

All cases referred to the competent authority must be referred to the police by the competent authority taking the reasonable grounds decision, where a referral to the police has not already taken place.

In cases where there is an immediate threat to the potential victim, a referral to the police should already have been made by the first responder or frontline worker. Where this has not happened and the competent authority considers there is an immediate threat to the potential victim, the competent authority must refer a case to the police as soon as the information is known to the Home Office or UK Human Trafficking Centre (UKHTC). Where there is not an immediate threat, the case should be referred to the police by the competent authority following the reasonable grounds decision. The referral to the police should include the:

- outcome of the reasonable grounds decision
- minutes or reasons for the decision
- NRM referral form

Where a positive reasonable grounds decision has been made, the police must record the case as a crime and a crime reference number must be shared with the competent authority to add to the case file. When providing the crime reference number to the competent authority the police should, wherever possible, indicate if an investigation is underway or likely to be undertaken. This will help to inform the competent authority of any evidence that may support the conclusive grounds decision or a consideration of discretionary leave.

Where a negative reasonable grounds decision is made it is at the discretion of the police whether there is evidence of an alternative crime that warrants recording and any subsequent investigation.

When making a referral to the police, the competent authority should send the information to the police force where they think the exploitation took place. If they do not know where the exploitation occurred or if the exploitation occurred overseas, the case should be referred to the police force in the area where the victim currently lives (or where they were encountered if their residence is unknown).

When sharing information with the police, the competent authority should be aware that:

- potential victims are under no obligation to cooperate with the police themselves and some potential victims may not want the police to be involved at all
- in some cases there may be few details provided but it is not for the competent authority to seek to filter the cases which are likely or unlikely to be of interest to the police - the police will decide which cases they wish to investigate and as such all cases must be referred to allow the police to make that assessment
- in some cases the police may not pursue a case unless the individual engages with them directly - it is not for staff in the competent authority to press the police to pursue a criminal investigation or convince the potential victim to co-operate, however, staff in the competent authority must note the outcome of the referral to the police on the file
- it may also be helpful to discuss a case with the police to gather any additional information to help with the conclusive grounds decision

All NRM cases involving children should therefore be referred to the police.

Any information staff at the competent authority disclose must be in accordance with the law, in particular the Data Protection Act (1998).

How to refer a child into the NRM

Once Children's Services and police have assessed indicators of modern slavery and a child has been protected or safeguarded, the next step for first responders is to refer the child into the NRM.

If you identify a child as a potential victim of modern slavery, you must refer them to a competent authority by completing an NRM referral form. There are separate forms for adults and children. Please see the [NRM referral form and guidance notes](#).

In Northern Ireland, referrals to the NRM should be made by the relevant HSCT. Other organisations that hold first responder status should refer child victims or suspected child victims of modern slavery to the relevant HSCT immediately.

Potential child victims do not need to consent to their referral.

A referral into the NRM and the subsequent decisions do not replace or supersede established child protection processes, which should continue in tandem.

Referrals made in relation to children should be made on the child NRM referral form. Please see the [NRM referral form and guidance notes](#), including a list of potential indicators of children who may have been trafficked or victims of slavery.

There are currently 2 different referral forms – one for children referred in England and Wales and one for children referred in Scotland and Northern Ireland.

Completing the NRM referral form

You must then complete the modern slavery referral form as follows:

- give as much information about the potential victim and their circumstances as possible - you must fully detail the reasons for the referral and circumstances in which the person was identified in section D of the form
- if indicators of human trafficking or modern slavery are not listed on the form, these can also be entered at section D

It is good practice to consult the child when making the NRM referral, explaining the purpose, concerns, benefits and the possible outcomes. Children (including where there is an age dispute but the victim is believed to be a child) do **not** need to sign the consent form.

All referrals should be sent, in the first instance, to UKHTC. First responders can either send completed referral forms by fax to 0870 496 5534 or by email to UKHTC.

The duty to notify

From 1 November 2015, specified public authorities have a duty to notify the Secretary of State of any person encountered in England and Wales who they believe may be a victim of slavery or human trafficking.

Therefore, certain frontline staff who encounter a potential victim of modern slavery are now required to notify the Home Office under Section 52 of the Modern Slavery Act.

This requirement applies to the police, local authorities, the National Crime Agency and the Gangmasters Licensing Authority.

UK Visas and Immigration, Border Force and Immigration Enforcement must also comply with the duty as a matter of Home Office policy.

This applies to potential victims identified in England and Wales only.

This duty is intended to help build a more comprehensive picture of the nature and scale of modern slavery.

For further information, please see: [duty to notify](#).

What does the duty to notify mean in practice?

For potential child victims, the duty to notify should be discharged by referring the child into the National Referral Mechanism (NRM).

When you refer a potential child victim to the NRM, you should send an NRM referral form to UKHTC at email address UKHTC and this will satisfy the duty to notify. This process should be used in all cases involving children and young people under 18.

Once you have referred a case to the NRM you **do not** need to send a copy of the form to the duty to notify mailbox. This is a separate email inbox for notifying the Home Office about potential adult victims who do not want to enter the NRM. It should not be used in child cases which should always be referred to the NRM using an NRM referral form.

Timescales for satisfying the duty to notify

If you are using the NRM Referral form, you should send this to UKHTC as soon as practicable.

What happens next?

The referral will be allocated to a competent authority within the Home Office or UKHTC, who will acknowledge receipt of the case with the first responder. This competent authority is now the first responder's first point of contact in relation to the NRM referral and should be kept abreast of any developments and supplied with any information that is of relevance to the modern slavery consideration.

It is acknowledged that at the early stages of the process (for example where a child is traumatised or in fear and is unable at this stage to engage fully in an assessment process) that first responders may be unable to provide sufficient detail about the individual and their potential modern slavery experience, to enable the competent authority to make an informed reasonable or conclusive grounds decision (see ['How are decisions made'](#) section below).

However, it is important that all pertinent information available is provided and that you make the competent authority aware that additional information will be provided in time. You should keep the competent authority informed of progress, including any progress in relation to the age assessment process, and work in partnership.

How are decisions made?

The Council of Europe Convention on Action against Trafficking in Human Beings stipulates a 2 stage process for identifying victims of trafficking.

The first part is the reasonable grounds test, which acts as an initial filter to identify potential victims.

The second is a substantive conclusive grounds decision as to whether the person is in fact a victim. This 2 stage test covers all human trafficking cases in any part of the UK (and slavery, servitude, or forced or compulsory labour in England or Wales).

NRM reasonable grounds decisions

Once the case has been formally referred, a competent authority will consider the details supplied by the first responder on the NRM Form along with any other evidence and apply a 'reasonable grounds' test.

The test the competent authority must apply is:

- whether the statement 'I suspect but cannot prove' the person is a victim of human trafficking in Scotland and Northern Ireland or the person is a victim of modern slavery which includes human trafficking or slavery, servitude, or forced or compulsory labour in England or Wales) is true
- whether a reasonable person, having regard to the information in the mind of the decision maker, would think there are reasonable grounds to believe the individual had been a victim of human trafficking or modern slavery

For England and Wales cases, indicators of all forms of modern slavery are likely to be similar – it may not be initially clear to the competent authority whether a potential victim has been subject to human trafficking or slavery, servitude, or forced or compulsory labour. So to reach a positive reasonable grounds decision the competent authority just needs to determine that, on the information available, it is reasonable to believe that a person is a victim of the crime of modern slavery; the competent authority does not need to distinguish at the reasonable grounds stage which form of modern slavery they have experienced.

Reasonable suspicion would not normally be met on the basis of an unsubstantiated claim alone, without reliable, credible, precise and up to date:

- intelligence or information
- evidence of some specific behaviour by the person concerned

Where reliable, credible, precise and up to date intelligence, information or evidence is present, it must be considered in reaching a reasonable grounds decision.

The expectation is that the competent authority will make a reasonable grounds decision within 5 working days of the NRM referral being received at the UK Human Trafficking Centre (UKHTC) where possible.

If the competent authority makes a positive reasonable grounds decision, the individual must be given support if they want it during a 45 day recovery and reflection period. This temporary period provides the conditions for a full evaluation to conclusively decide if the person was a victim of human trafficking or modern slavery at the date of the reasonable grounds decision. This is a not an immigration decision.

The recovery and reflection period is a legal concept that triggers certain rights and measures under the Council of Europe Convention on Action against Trafficking in Human Beings and in no circumstances should the competent authority deny an

identified victim these rights where the victim indicates they want them. This recovery and reflection period has been extended to cover positive reasonable grounds decisions in all modern slavery cases in England and Wales.

No immigration detention or removal action will be taken against the subject during this time.

Once the decision has been reached, the competent authority will notify the first responder and the local authority (child's social worker) and not to the child directly.

You may find that following a positive reasonable grounds decision you are still working with the child to ascertain more information that will assist the competent authority in reaching a conclusive grounds decision. In these circumstances you may request the 45 day recovery and reflection period be extended in order to ensure all relevant information has been obtained. The competent authority has the discretion to extend the 45 day recovery and reflection period when it is in the best interests of the child. Again, work in partnership and keep the competent authority informed of progress.

If the decision is negative, there will be no further modern slavery identification decision by the competent authority.

Children's Services should ensure a negative NRM decision does not have an adverse impact on the child's care and does not override the statutory duty placed on local authorities by virtue of the Children Act 1989 and 2004; the Children (Scotland) Act 1995; and The Children (NI) Order 1995.

Reconsideration of reasonable grounds or conclusive grounds decision

If, through ongoing assessments by Children's Services, the child is able to subsequently disclose further details or other professionals are able to provide more information, this can be submitted to the first responder or support provider at a later date, asking for the decision to be reconsidered.

For more details on reconsidering decisions please see [the competent authority guidance](#).

NRM conclusive grounds decision

Following a positive reasonable grounds decision, competent authorities are required to make a second identification decision.

At the conclusive grounds decision stage, the competent authority must consider whether, 'on the balance of probabilities', there is sufficient information to decide if the individual is a victim of human trafficking or modern slavery.

The 'balance of probabilities' essentially means that, based on the evidence available, human trafficking or modern slavery is more likely than not to have happened. This standard of proof does not require the competent authority to be certain that the event occurred.

The expectation is that a conclusive grounds decision will be made as soon as possible following day 45 of the recovery and reflection period. There is no target to make a conclusive grounds decision within 45 days. The timescale for making a conclusive grounds decision will be based on all the circumstances of the case.

However, some victims may need longer due to the levels of trauma and impact on their health and competent authorities have the option to extend the period of recovery and reflection in certain circumstances.

What are the benefits of referring children into the NRM?

NRM referrals will help Children's Services ensure a focused and appropriate response is in place for the child by ensuring all available information is gathered and shared quickly between partners. This will ensure the child's needs are addressed and mitigating factors are taken into account such as the risk of the child going missing.

Further guidance on missing persons can be found at the following:

- [ACPO \(2005\) Guidance on the Management, Recording and Investigation of Missing Persons](#)
- [NPIA \(2007\) Update to the Guidance on the Management, Recording and Investigation of Missing Persons 2005](#)
- [ACPO \(2009\) Interim Guidance on Missing Persons, as a Supplement to the ACPO \(2005\) Guidance on the Management, Recording and Investigation of Missing Persons](#)
- [ACPO \(2010\) Guidance on the Management, Recording and Investigation of Missing Persons \(Second Edition\)](#)
- [ACPO \(2013\) Interim Guidance on the Management, Recording and Investigation of Missing Persons](#)
- [Supporting document to the ACPO \(2013\) Interim Guidance on the Management, Recording and Investigation of Missing Persons](#)

The NRM is an important tool in the fight against those who commit this heinous crime. Evidence collected from referrals helps build a national picture and informs the decisions of policy makers and operational staff. In this sense NRM referrals and the intelligence they provide contribute directly to UK efforts to tackle modern slavery and may ultimately lead to a reduction in the number of child modern slavery cases seen in the UK. NRM referrals will also inform the authorities of the incidence of child modern slavery and, where relevant, the source countries from which they have been trafficked.

The NRM process encourages a joint multi-agency working approach between a variety of agencies and through this process a more rounded view of the evidence and information will be collected. This will not only assist in the referrals made but will assist in the overall protection and safeguarding response for the child.

In addition, where necessary the Home Office will consider whether to grant discretionary leave to remain in the UK for reasons set out in the published guidance. See [Victims of Modern Slavery: Competent Authority guidance](#).

If the child wishes to return to their country of origin (when they turn 18), certain services may also be available such as assisted voluntary return which provides support, advice and guidance to help them with their return and reintegration.

Further information: indicators of modern slavery

A comprehensive list of potential indicators of children who may be victims of modern slavery is provided in the [NRM child referral form](#).

This is not an exhaustive or definitive list but it does highlight the more common indicators that may be identified. They should assist first responders in making a primary assessment of whether the individuals encountered are or may be potential victims of modern slavery.

It is not the case that a set number of indicators will equate to a person being a victim. One or a combination of factors could suggest a person is a potential victim, so each case should be considered on its own merits. Indicators highlight a potential situation to first responders, who should then decide whether to make a referral into the National Referral Mechanism (NRM).

Potential victims of modern slavery may be unforthcoming with information, and may tell their stories with obvious errors. It is not uncommon for modern slavery facilitators to coach victims or provide stories for victims to tell if approached by the authorities. The errors or lack of reality may be because their initial stories are created by others and learnt.

Victims' early accounts may also be affected by the impact of trauma. In particular, victims may experience Post Traumatic Stress Disorder, which can result in symptoms of hostility, aggression, difficulty in recalling details or entire episodes, and difficulty concentrating. Those who have been trafficked may also be uncertain about the places and countries they have travelled through as their traffickers are likely to withhold that information from them.

Be prepared to encounter victims with varying English language skills or other communication barriers. You should not use family members, friends or unqualified members of the public to interpret.

Further information: children encountered in situations of criminal exploitation

Frontline staff should bear in mind that children who are victims of modern slavery can be forced into forms of criminal activity as part of their exploitation, for example gardeners in cannabis factories or as pick pockets. These victims are some of the most vulnerable and least likely to admit their situation to law enforcement due to the threats made on them by the modern slavery facilitators. In these cases, when the signs are not identified, the young person ends up being charged, prosecuted and convicted of offences committed whilst being exploited. Often, such children are instructed by their modern slavery facilitators to plead guilty, then when they are released from their sentence they are returned to modern slavery.

Law enforcement officers should always be alert to the possibility that any child encountered in such situations could be a victim of modern slavery. Child protection obligations apply where the young person has been a victim of crime and also the fact that any person under the age of 18 years cannot consent to their own modern slavery. Where circumstances give rise to reasonable suspicion that the young person is being exploited or abused, a child welfare response should be taken and child protection officers utilised.

Law enforcement should work with local authorities to ensure early identification of modern slavery victims before entering any suspected cannabis farm. In the planning stage of any proactive operations or other police interventions on cannabis farms, dual operational planning should focus not only on the recovery of illegal drugs and the arrest of members of criminal enterprises, but also on the safeguarding of any children who are being exploited on the premises.

Other useful documents

The following provide updated practice guidance on child trafficking:

- [Safeguarding children who may have been trafficked](#), issued jointly by the Department for Education and the Home Office
- [Safeguarding children in Scotland who may have been trafficked](#), issued by the Scottish government
- [Safeguarding children who may have been trafficked](#), issued by the Welsh government

These documents also provide details of national agencies and areas of local effective practice that can provide support.

The above Department for Education and Home Office guidance is supplementary to, and should be used in conjunction with, the government's statutory guidance: '[Working together to safeguard children](#)'. The above Scottish government guidance is supplementary to, and should be used in conjunction with, the Scottish government's '[National guidance for child protection in Scotland](#)' and that issued in Wales is supplementary to '[Safeguarding children: working together under the Children Act 2004](#)' issued by the Welsh government. These guidance documents set out how organisations and individuals should work together to safeguard and promote the welfare of children and young people in accordance with the Children Act 1989 and the Children Act 2004, and the Children (Scotland) Act 1995.

In Northern Ireland '[Working arrangements for the welfare and safeguarding of child victims of human trafficking](#)' details the procedures to be taken when a child is a victim or suspected victim of child trafficking. This guidance was issued jointly by the Department of Health, Social Services and Public Safety and the Police Service for Northern Ireland in February 2011.

The '[London safeguarding children boards trafficking toolkit and guidance](#)', or the '[Inter-agency guidance for child trafficking in Scotland](#)' (and the '[national protocol on safeguarding children who may have been trafficked](#)' which forms part of the '[All Wales child protection procedures](#)', also help first responders identify and support children who have been trafficked. The guidelines aim to support social workers, teachers, police, health workers and other professionals who may come into contact with suspected victims of trafficking. The documents include a number of additional tools to assist professionals in both assessing the needs of the child and the continuing risks that they may face, and referring their case to the NRM.

The Department for Education has also published guidance for on the '[Care of unaccompanied and trafficked children](#)' in 2014. It also published '[Statutory guidance for local authorities on the care of unaccompanied asylum seeking and trafficked children](#)'

Other useful information on child trafficking issues can be found on the [NSPCC website](#).

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Frequently asked questions

Is there a specific time scale within which I should make the NRM referral?

Whilst there is no specific time scale for when an NRM referral should be made, it is advisable that it is made as soon as possible. As the NRM engages a host of agencies an earlier referral may be able to assist in informing the safeguarding needs of the child. It is important that when a referral is made, sufficient evidence and information is submitted along with it.

Is the NRM mandatory and what information should be shared with children and young people?

Whilst the NRM is not mandatory, as a matter of policy all children should be referred to the NRM where indicators of trafficking or slavery are present.

There are clear benefits in referring for both the child and the local authority (HSC Trust in Northern Ireland) as well as to increase the UK law enforcement agencies' understanding of modern slavery patterns and to take action against identified modern slavery facilitators. All cases where modern slavery is suspected should therefore be referred into the NRM.

Decisions relating to the NRM will be sent to the child's social worker and not to the child directly.

What should I do if I receive information on a potential trafficker or I believe a child is still being exploited?

Modern slavery is a very serious crime, punishable by up to life imprisonment. If you are concerned someone is engaged in modern slavery or is a potential victim still in an exploitative situation the police should be informed immediately and details emailed to UKHTC.

Where can I get more information?

- UKHTC – telephone 0844 778 2406 or email UKHTC
- Scottish government – telephone 0131 244 7583 or email Child Protection
- NSPCC CTAC – telephone 0808 800 5000 or the [NSPCC website](#)

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