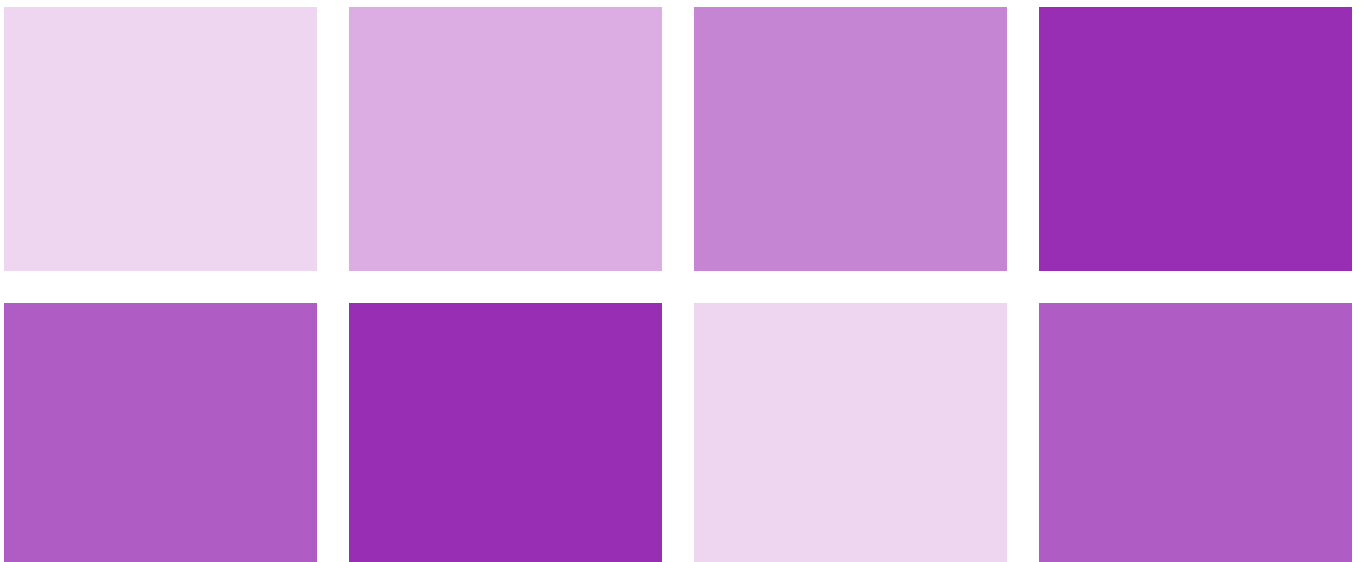




Home Office

Interim Review of the National Referral Mechanism for victims of human trafficking



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1 Introduction

1.1 Background

The national referral mechanism (NRM) is the process by which people who may have been trafficked are 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), has matured during the subsequent years; as at 30 June 2014 approximately 6,200 people had been referred into the NRM.

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

I was asked to review the NRM in two stages. This first report covers the process of the review and focuses on three broad areas:

- Identification
- Access to support
- Governance

I have outlined the approach I have taken and those whom I have consulted as well as identifying the key emerging themes. My main report will reflect the questions asked in the terms of reference for the review and will provide recommendations on how to address the issues which have arisen.

1.2 Approach

My starting point has been the victim and their experiences; the lens I have used has been unashamedly focused on them. I have been enormously helped by a small team of civil servants and an independent consultant. My ability to provide numerical evidence to support commonly held views and themes has been hampered by the lack of data; that which is available contains a significant number of undecided cases which impacts on the figures. I will continue to work with UK

Human Trafficking Centre (UKHTC) and the Home Office Chief Scientific Officer to provide evidence or otherwise to support our thinking.

1.3 Process for the review

I have been delighted by the engagement of everyone who has contributed thus far to the review. The team and I have held meetings with informative and interesting individuals. The subject matter is harrowing but this review is about the victims who have suffered profoundly traumatic experiences and giving them the opportunity to recover and integrate safely.

1.3.1 Evidence gathering

The team has conducted a range of activities to gather evidence for the review. I have invited and received **written evidence** on all aspects of the NRM. This evidence has come from a wide range of organisations from non-government organisations (NGOs) to statutory agencies and advisors. As a team we have **consulted** over one hundred organisations including other government departments, European partners, local authorities, police, practitioners, Parliamentarians, erudite campaigners and crucially victims who have always been willing to talk and tell me and the team of their appalling experiences. We have met at the premises of those we have spoken to and visited safe houses in order to better experience the reality both for the victims and those working closely with them. The issues identified in these meetings have been analysed. I 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 statutory authorities in Scotland, Northern Ireland and Wales where some exemplars of best practice have been identified; we have met with representatives from around the UK; and we have **attended events** to publicise the review and invite comment. A full list of those with whom we have engaged is at annex A.

We have **reviewed the written material** produced by a wide range of organisations including those produced for the Joint Committee on Modern Slavery; a list is at annex B.

1.3.2 Involving UK Visas and Immigration, UK Human Trafficking Centre and mapping the current process

The Home Office Continuous Improvement (CI) team has assisted me in the review by visiting the UKHTC (part of the National Crime Agency), UK Visas and Immigration (UKVI) NRM Hub, the Detained Fast Track asylum team and the Third Country Unit asylum team (all part of UKVI) and Criminal Casework Directorate (Immigration Enforcement); all make decisions on referrals for the identification of human trafficking victims. The CI team has mapped the process for each area and identified the key issues in the decision making process.

1.3.3 Workshops

A number of focussed workshops have been held to date including one to consider the particular issue of children within the NRM and another a closed case workshop, which brought UKVI, UKHTC, support providers and first responders together to examine the referral process and the information available for decision making (attendance at annex C).

1.3.4 Best practice

I have looked at and learned from practices in other areas, in addition to that of devolved administrations mentioned at 1.3.1 above. I have particularly considered child safeguarding processes and systems for supporting victims of domestic violence. My learning from those working with victims of domestic violence is that we need to ensure we deal with victims of human trafficking or modern slavery as victims first and foremost.

1.3.5 Consolidation

The team has met regularly to think through the evidence, holding in mind our victim focus¹; and to formulate ideas for how a new system might work to serve victims best whilst ensuring firm controls are maintained within the immigration systems. A further challenge session has been held with members of the Modern Slavery Unit who kindly helped us to think about the practicalities of our proposals. We have talked in depth to the UKVI team in Leeds about our evolving thinking as well as to Immigration Enforcement and UKHTC colleagues.

Engagement is, of course, continuing and now I am focusing on the emerging issues and ways in which to address these.

2 Identification

There is evidence of under representation in all groups of human trafficking victims and I have heard of victims not being identified for a number of reasons. Firstly I have seen an inconsistent approach to the proactive work to search out and find victims; secondly, once found, I have heard of victims who do not see themselves as victims or choose not to leave their trafficker; thirdly I am aware that the statutory authorities may not recognise victims when they do encounter them.

I am clear that there needs to be a greater general awareness of the crimes of human trafficking and modern slavery. The Home Office has launched a campaign, which will run until the end of October 2014, to increase awareness with the public that slavery exists in the UK, inform people of the signs

¹ I am particularly grateful to the Helen Bamber Foundation for their offer of premises to allow us to conduct these sessions.

to spot, and encourage the reporting of slavery via the new helpline and website². The campaign seeks to communicate simple messages to inform the public of the most prevalent types of slavery and show that victims can be men, women and children from a range of backgrounds. The Modern Slavery Bill requires statutory authorities to report, anonymously, those whom they believe to be victims but who do not want assistance; this, alongside the current communications plan, will be part of the solution to this problem.

2.1 Referral by the first responder

When a potential victim is initially seen by a first responder, they need to jointly complete a referral form. The form is a series of tick boxes followed by space for more detail. This process is crucial but at present is both rather clumsy and ill timed. The information collected is vital to allow the competent authority the opportunity to make an informed decision about whether a victim has been trafficked; it could be collected in slower time after a potential victim has been extricated from their trafficker and made safe.

2.1.1 Identification process

Referrals come into one central location, the UKHTC. UKHTC make decisions only on cases involving British Citizens, EU and EEA nationals, who are often encountered by police in the place of exploitation. They do not always require an interview before being conclusively identified as victims of human trafficking. UKVI make decisions on cases involving non-EEA nationals. Referrals in these cases are predominantly made by immigration staff who have encountered the individual either during an asylum screening interview, a substantive asylum interview or during enforcement activity. These individuals are rarely identified at the place of exploitation and an interview usually takes place in order to make an informed identification of a victim.

Some referrals are received by UKHTC but do not enter the NRM process, mostly because the referral form is unsigned. 9% of referrals submitted from January to June 2014 were returned to first responders due to errors, the most common being unsigned forms. In addition, poor quality referrals delay the consideration of the identification of victims as further information needs to be sought.

² The new modern slavery helpline (0800 0121 700) and website (www.modernslavery.co.uk).

2.1.2 First responder role

The first responder acts as a lynch pin between communities, front line workers in voluntary sector organisations, hospitals, police, social services and many others and the NRM itself.

NGO first responders are currently appointed through an NRM oversight group chaired by the Modern Slavery Unit; their training and oversight is not prescribed. Many statutory bodies are also first responders, but training and awareness is patchy. There is no feedback offered to first responders about the quality of their referral or the ultimate outcome. Whilst it is important to raise awareness of trafficking indicators within first responder organisations, it is not realistic to assume that all staff who may encounter a victim will have the in-depth knowledge required to make referrals.

First responders do not always understand that they are the first stage in a wider process of identification. The information they provide is a key first step in that process. First responders are not simply referrers.

2.1.3 Training

There are various training courses available for first responders, but these are not compulsory and there is no system of standardisation or approval. I have seen several exemplars of good practice across the UK:

- training and raising awareness programmes within secondary schools and hospitals in Northern Ireland;
- Border Force rolling out learning and development across key ports.

The Modern Slavery Bill includes a provision for statutory guidance for the identification and support of victims to ensure a consistent and effective approach.

2.2 Identification leading to prosecutions

I have been troubled by the seemingly low number of criminal prosecutions arising from the NRM. Whilst comparable data is very hard to find it would appear that less than 1 in 10 of those referred to the NRM are involved in a case which is prosecuted on the grounds of trafficking³.

³ We do appreciate that there are some prosecutions of offences committed within the trafficking situation such as rape or assault rather than a prosecution for trafficking.

2.2.1 The role of the police

More needs to be done to pursue those individuals and organised groups profiting from this crime; this should occur through diligent intelligence gathering, relationship building with individual victims and coordinated follow through. Intelligence gathering is not consistent or coordinated and there is a lack of understanding about where information obtained during the NRM process can be submitted to contribute to an intelligence picture. I have heard experienced police officers describe how hard it is to establish trust with victims who may be traumatised and afraid; it takes time for that trust to develop. It is important to see prevention and disruption as well as prosecutions as opportunities arising from intelligence gathering. Victims may have been threatened by their traffickers with punishments for family members if they speak to the police; these threats are very real and there need to be ways of bringing perpetrators to justice without putting a victim or their family at risk.

2.2.2 The role of providers

Equally I have been concerned that some providers of support during the reflection period do not see helping a victim provide evidence to the police that might lead to a prosecution, disruption or prevention, as being a vital component of their work. Whilst assistance and support will not be in any way conditional upon a victim's agreement to cooperate in investigations and criminal proceedings, I welcome the requirement that encouraging victims to co-operate with police investigations will be within the new provider contract. There is evidence that prosecution and potential reparation helps victims and can stem the flow of abuse. With a more concerted and coordinated effort from everyone involved, there is a greater chance of the criminals behind this abuse being brought to justice.

There are opportunities for improving successful identification by:

- **greater awareness raising more generally and within front line organisations;**
- **co-ordinated gathering of information to provide intelligence; and**
- **ensuring the quality of referrals through training and a feedback process.**

3 Access to support

I believe that support for victims is a key function of the NRM; but access to support must be well managed and appropriate for individual victims needs. It is important that the NRM process is able to identify and support victims with an entitlement to the benefits of the NRM. There is potential for abuse in any system by an individual who makes a false claim and it is the duty of first responders initially, and those supporting victims in the NRM, to help identify these individuals.

3.1 Current practice

At present, support is available for anyone who, having been referred to the NRM, receives a positive reasonable grounds decision. This support varies and ranges from safe house accommodation with live-in support workers through to outreach support for those living with friends or in asylum support accommodation.

There is evidence that more than 25% of those receiving a reasonable grounds decision will not receive a positive conclusive grounds decision (definitions at annex D). This means that the main provision for victims is available to a group of individuals who are deemed, on the balance of probabilities, not to be victims of trafficking. I am keen to remedy that.

3.2 The gate, not the definition is key

I have heard a number of arguments in favour of opening this gate to victims of modern slavery (definition at annex D). In principle I see no reason why the support of the NRM should not be extended to all victims of modern slavery⁴ but I will consider this fully in my final report. The numbers are unclear, but we suspect that the increase in numbers of victims would not be significant; there is a variety of contradictory views from statutory agencies about this topic. However if the scope of the NRM is widened it is imperative that all parts of the system are ready to accurately identify and support these victims, and that the appropriate training and feedback systems (see 2.1.3 above) are in place.

The professionalisation of the first responder role will ensure that referrals as a whole are more accurate and access to support is focused on those who most need it.

4 Governance

The management and administration of the NRM is fragmented and I have seen:

- a lack of accountability for ensuring victims' needs are met; and
- decision making not always happening as early as it might (often because of the lack of timely receipt of information from other parties).

4.1.1 Management of the NRM process

Since the creation of the UKVI NRM Hub in 2013, strong and positive steps have been made to get a grip of the system previously encumbered with delay. But there is still much work to be done.

⁴ As defined in clause 1 of the Draft Modern Slavery Bill.

There is no over-arching ownership of the NRM process by a single body. As a result, there is no single case management system to help understand the national trafficking caseload or the scale of the problem. The statistical data published by the Government is created from a few reliable fields within an unreliable and incomplete spreadsheet that limits analysis of the data. It is not possible to obtain reliable information or data on key elements of the NRM process such as, number of cases withdrawn, the number and progress of police investigations, or the number of Judicial Reviews.

I have seen the mapping which shows the considerable amount of administrative work throughout the NRM process, such as recording and updating local spreadsheets, filing, requesting information and notifying relevant parties of decisions, which takes valuable time away from decision making. Guidance for decision makers is not comprehensive and as a result processes have been created by staff to best fit what they perceive is required of them. This is evident in the number of administrative tasks within the decision making process.

The team has heard from a variety of organisations of the struggles people have had in obtaining and sharing important information.

I have been struck by the importance of establishing a system in which all parties, including but not limited to victims, can have confidence. The objectivity and expertise should not be in doubt. Some stakeholders have indicated that a right of appeal is essential to achieve this. However, rights of appeal, if not designed appropriately, can slow down decision-making without adding value. I will consider whether a right of appeal helps achieve shared confidence in the process.

I believe that an end-to-end case management system which puts the victim at the centre of the process can ensure:

- **better co-ordination between relevant bodies;**
- **more timely progress of decision making; and**
- **a consistent point of contact for all parties through the process.**

4.1.2 Multi-disciplinary approach

Everyone from whom I have heard has supported a process which ensures that a wide range of information is available to make a decision. My early thoughts are that a multi-disciplinary decision making process provides the best way of harnessing the professional expertise needed to make the trafficking or modern slavery decision.

4.1.3 Statutory footing

I will consider in my final report the issues associated with putting the NRM on a statutory footing. I understand that some stakeholders believe it is important that any process of this sort has clear legal underpinning. However, I have also been told that it is important that the process is flexible and capable of improvement – which can be difficult within strict legal constraints.

4.2 Sharing information

The personal nature of the information dealt with means that data sharing is perceived as being problematic. I have heard examples of organisations involved in the NRM process being reluctant to fully trust one another and share information appropriately. UKVI, police and NGOs have all described difficulties in obtaining relevant information or trying to identify the appropriate contacts within organisations. For UKVI this is especially frustrating making it hard to keep to agreed timescales for decisions.

There are significant dependencies between organisations involved in the identification and support of victims and regrettably I have observed some antagonism between organisations; this is not in the best interest of victims. I want the new NRM to be victim focused where differences can be put aside in the interest of supporting extremely vulnerable people and providing them not only with safety and security, but with a system where all parties work together.

It is clear that a stronger governance framework headed by the Home Office is required. This framework should contain a definition of accountabilities and responsibilities for all bodies involved in the NRM, and a requirement to share information. It should also include a performance framework against which we can measure the efficiency of the process and the outcomes it achieves for victims.

5 Conclusion

This is an interim report, which sets out our process and initial views on just three areas; I am conscious that there are still many areas where we need to complete our thinking around the reform of this system. As outlined in annex A, I have consulted widely across NGOs, civil servants and victims. There are three key emerging issues which I will focus on in my final report and which will shape my recommendations. These are the need for:

1. a tighter, professionally managed entry to the NRM;
2. multi disciplinary decision making; and
3. comprehensive oversight of the system.

Through this deliberation I continue to balance recommendations, consolidating a system which works very well for victims alongside one which ensures those exploiting it are excluded from it with care and reason.



Jeremy Oppenheim
Director Growth and Engagement
Home Office

Stakeholders engaged in the review

Andrew Webb – Former President Association of Children’s Services and Director of Services for People at Stockport Council

Anthony Steen – Human Trafficking Foundation

Baroness Butler Sloss

Cathy Zimmerman – Researcher

David Pearson – President of Association of Directors of Adult Social Services

Jenny Marra – Scottish Parliament

John Vine – Chief Inspector

Keith Towler - Children’s Commissioner for Wales

Lord Bishop of Derby

Lord Warner

Lucy Maule – Centre for Social Justice

Maggie Atkinson – Children’s Commissioner for England

Noreen Tehrani – Clinical psychologist

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

Sian Oram – Researcher

Tam Baillie – Scotland’s Commissioner for Children and Young people

Organisations

Government Departments:

Appeals and Litigation Directorate – Home Office

Immigration Enforcement – Home Office

Asylum Screening Unit - UKVI

AVR team - UKVI

BIS

Border Force

Department for Education

Equality and Social Inclusion, Department of Health

Safeguarding unit

Immigration Crime - Home Office

Leeds Hub - UKVI

Met Police Trafficking Unit

UKHTC

Other:

Ashiana Sheffield

Asylum Aid

Baobab Centre

Barnados

Care Quality Commission

CEOP, NCA
Children and Families across Borders
Children Society
City Hearts Sheffield
Co-ordinated Action Against Domestic Abuse
Counter Human Trafficking Bureau
Crisis Counselling Glasgow
Croydon Council
CSJ working group
Eaves/Poppy Project
ECPAT
Focus on Labour Exploitation
Greater London Authority
Helen Bamber Foundation
Helen Bamber Foundation Medico-Legal
Hestia Housing
Hillingdon Safeguarding Team, Hillingdon Council
Human Trafficking Foundation
ILPA
IOM
Kalayaan
Medaille Safe House
Medaille Trust
NSPCC
NWG Network
Refugee Council
Salvation Army
Senior Policy Manager – Criminal Justice and Partnerships, The Association of Police and Crime Commissioners
Strategic Director Adult Social Services, Housing and Health, Sutton
Unseen
Walk Free
Walthamstow Refugee Support Psychology Service
Woman's Aid

Meetings attended:

Association of Directors of Children's Services - annual meeting
The Tackling Modern Slavery Conference – chaired by Philip Ishola
Operation Pheasant Task Force (Wisbech Cambridgeshire) – chaired by Robin Sissons

Scotland:

COSLA Migration, Population and Diversity Glasgow
Detective Superintendent Police, Scotland
Glasgow City Council
Government Affairs Manager EHRC Scotland

Migrant Help

NRM lead UKVI Glasgow

Procurator Fiscal depute, policy division COPFS, Scotland

Scottish Government Criminal Law and Licensing Division

Scottish Guardianship service

Tara

Women and Young Persons' Department, Legal Services Agency Scotland

Northern Ireland:

Amnesty International

Belfast and Lisburn Women's Aid

CARE

Crime Reduction Branch Community Safety Unit

David Ford – Minister for Justice Northern Ireland

Department for Employment and Learning

Department for Justice Human Trafficking Team

Department of Health, Social Services and Public Safety

Department of Health, Social Services and Public Safety

Evangelical Alliance

Freedom Acts

Health and Social Care

Invisible Traffick

Law Centre Northern Ireland

Migrant Help

National Union of Students

Northern Ireland Council for Ethnic Minorities

Northern Ireland Prison Service

NSPCC

Patricia Lewsey-Mooney – Children's Commissioner Northern Ireland

Police Service NI

Regional Adult Safeguarding Officer, Health and Social Care Board

South Tyrone Empowerment Programme

Wales:

BAWSO

Exploitation Officer Safer Wales Ltd

Mwenya Chimba - Director of Violence against Women

New Pathways

Operation Eagle single point of contact - Gwent Police

Operation Eagle single point of contact - South Wales Police

Partnership Manager Cardiff Council

Safer Wales Ltd

Stephen Chapman – Anti-Slavery Coordinator

UKVI and Immigration Enforcement Wales

WLGA

Written evidence has been received from:

Barnardo's
CARE
CPS
FLEX – Focus on Labour Exploitation
Gangmasters Licensing Authority
Gloucestershire Police
HM Chief Inspector of Prisons
International Organisation for Migration
Kalayaan
Kent Police
National Crime Agency
Northern Ireland Assembly Committee for Justice
Northern Ireland Council for Ethnic Minorities
Northern Ireland Department of Justice
NWG Network – Tackling Child Sexual Exploitation
Refugee Council
Scottish Government
Thames Valley Police
The Children's Commissioner for England
The Children's Society
Unseen
Wiltshire Police
Women's Aid Federation Northern Ireland

DfE Guidance - Care of unaccompanied and trafficked children (July 2014)

Ox-Policy (Oxford Student Think Tank) – Rhetoric in Reality – How UK anti-immigration policies affect victims of human trafficking (May 2014)

ATMG (Anti-trafficking Monitoring Group) report for the Joint Committee on Modern Slavery – The National Referral Mechanism a Five Year Review (February 2014)

OSCE (Organization for Security and Co-operation in Europe) report - Trafficking in Human Beings Amounting to Torture and other Forms of Ill-treatment (2013)

Establishing Britain as a world leader in the fight against modern slavery:
Report of the Modern Slavery Bill Evidence Review (December 2013)

ATMG – Hidden in Plain Sight – three years on: updated analysis of UK measures to protect trafficked persons (October 2013)

Ministry of Justice – Code of Practice for Victims of Crime (October 2013)

ATMG – In The Dock – examining the UK’s criminal justice response to trafficking (June 2013)

CSJ (Centre for Social Justice) report - It Happens Here – Equipping the United Kingdom to fight modern slavery (March 2013)

UKHTC: A Strategic Assessment on the Nature and Scale of Human Trafficking in 2012

GRETA - Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by the United Kingdom (2012)

APPG - Report from the Joint Enquiry into children that go missing from care (2012)

NHS – Guidance on Implementing the Overseas Visitors Hospital Charging Regulations – (2011)

Equality and Human Rights Commission (Scotland) – Inquiry into Human Trafficking in Scotland (August 2011)

CEOP - Strategic Threat Assessment: Child Trafficking in the UK (2010)

ATMG – One Year On – the wrong kind of victim (June 2010)

World Health Organisation - WHO Ethical and Safety Recommendations for Interviewing Trafficked Women (2003)

Children's workshop list of organisations represented 07/07/14:

Aberlour
Association Directors of Children's Services
Asylum Screening Unit
ECPAT
Baobab Survivors
Barnardos
Barrister at Garden Court Chambers
British Association Social Workers
Children's Commissioner for England
Children's Commissioner for England's office
Children's Society
Immigration Law Practice Association
Law Centre Northern Ireland
Metropolitan Police
Modern Slavery Unit Home Office
National Crime Agency
NSPCC
Office of the Children's Champion Home Office
Professor of Child Welfare, University of Bedfordshire
Scotland's Commissioner for Children and Young People's office
UKVI Leeds Hub
UNICEF

Case Review workshop list of organisations represented 17/07/14:

Barnardos
City Hearts Sheffield
Crown Prosecution Service
Devon and Cornwall Police
Gangmaster Licensing Association
Hestia
Home Office
Northern Ireland Department of Justice
Medaille Trust
Migrant Help
NSPCC
Police Scotland
The Salvation Army
Scottish Government Justice Department
TARA
UKHTC - NCA
UKVI Leeds Hub
Welsh Government Anti-Slavery Co-ordinator

Reasonable grounds decision

The Council of Europe Convention on Action Against Trafficking in Human Beings has a two stage process for identifying victims of trafficking. The first part is the reasonable grounds test which acts as an initial filter before a more conclusive decision is taken. The reasonable grounds test considers if the statement 'I suspect but cannot prove that the person is a victim of trafficking' holds true.

The reasonable grounds test: The test a competent authority must apply is:

whether the statement 'I suspect but cannot prove (the person is a victim of trafficking)' is true, and 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 has been trafficked.

Conclusive grounds decision

At the conclusive decision stage, the competent authority must consider whether, on the balance of probability, there is sufficient information to decide if the individual is a victim of trafficking.

The 'balance of probabilities' essentially means that, based on the evidence available, trafficking (as defined by the Council of Europe Convention on Action Against Trafficking in Human Beings) is more likely than not to have happened. This standard of proof does not require competent authorities to be certain that the event occurred.

In reaching a decision the CA must weigh the balance of probabilities by considering the whole trafficking process. The trafficking process comprises a number of interrelated actions rather than a single act which takes place at a given time. To make a decision the competent authority must weigh the strength of the indicators or evidence presented, including the credibility of the claim, and apply common sense and logic based on the particular circumstances of each case.

Victims of modern slavery

A person commits an offence (of slavery) if—

- (a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
- (b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

“Trafficking in human beings” shall mean 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.

