



Home Office

National Referral Mechanism Pilots: Slavery Safeguarding Lead guidance

Version 1

30 October 2015

This guidance is only relevant to Slavery Safeguarding Leads who are part of the NRM pilot in West Yorkshire police force area and the South West (Avon and Somerset, Devon and Cornwall, Dorset, Wiltshire and Gloucestershire police force areas). Cases outside of these locations will be managed through the existing process, as set out in the existing Competent Authority guidance, here <https://www.gov.uk/government/publications/victims-of-trafficking-guidance-for-competent-bodies>.

Contents

1. Overview
2. Background
3. NRM review and pilots
4. Existing process and pilot processes
5. Which cases are part of the pilot
6. SSL Roles and Responsibilities
7. Myths about modern slavery
8. What is modern slavery?
9. Human trafficking
10. Guidance on the components of human trafficking
 - 10.1. Action
 - 10.2. Means
 - 10.2.1. Trafficking: Means: Deception
 - 10.2.2. Trafficking: Means: Physical coercion
 - 10.2.3. Trafficking: Means: Psychological coercion
 - 10.2.4. Trafficking: Means: Complex cases
11. Exploitation
 - 11.1. Trafficked for the 'purpose of exploitation' – what if someone hasn't yet been exploited?
 - 11.2. Trafficking: Exploitation: Sexual exploitation.
 - 11.3. Female victims of sexual exploitation
 - 11.4. Male victims of sexual exploitation
 - 11.5. Child victims of sexual exploitation
 - 11.6. Trafficking: Exploitation: Forced labour
 - 11.7. Trafficking: Exploitation: Forced criminality
 - 11.8. Trafficking: Exploitation: Removal of organs (Organ harvesting)
 - 11.9. Trafficking: Exploitation: Domestic servitude
12. Human smuggling is not human trafficking
13. Unclear cases
14. Slavery, servitude and forced or compulsory labour (cases identified in England or Wales)
15. Modern Slavery: Forced or compulsory labour (victim not trafficked)
16. Modern Slavery: Servitude
17. Modern Slavery: Slavery
18. Guidance on the components of modern slavery – slavery, servitude and forced or compulsory labour
19. Guidance on the components of modern slavery – slavery, servitude and forced or compulsory labour: Means
 - 19.1. Modern Slavery: Means: Physical coercion
 - 19.2. Modern Slavery: Means: Psychological coercion
 - 19.3. Modern Slavery: Means: Complex cases
20. Modern slavery: Service
21. Victim Identification
22. Child Victims
23. The NRM Form
24. The Reasonable Grounds Decision
25. Standard of proof

26. Considering evidence
27. How to assess credibility when making or Conclusive Grounds decision
28. Assessing credibility – general
29. Assessing credibility - Material facts
30. Assessing credibility – detail and consistency
 - 30.1. Level of detail
 - 30.2. Consistency
31. Assessing credibility – considering gender and culture
32. Assessing credibility – mitigating circumstances
 - 32.1. Delayed disclosure
 - 32.2. Difficulty recalling facts
33. Assessing credibility – potential prosecution of traffickers/facilitators of modern slavery
34. Disclosure
35. View of experts during the NRM process
 - 35.1. Evidence from Local Authorities and support organisations
 - 35.2. Weight to give to expert reports
36. Assessing victims who were exploited overseas or historic claims in the UK (Historic claims)
37. Criminal investigations and prosecutions – impact on NRM decision-making
38. Reasonable Grounds Outcome
39. Suspended cases
40. Appeals against a reasonable grounds decision
41. Reconsideration of a Reasonable Grounds decision

Annexes

Annex A - Indicators of Modern Slavery

1. Overview

This document provides guidance to the National Referral Mechanism's (NRM) Slavery Safeguarding Leads (SSL) on their role and responsibilities and how to make a Reasonable Grounds decision.

From 1 November 2015, Slavery Safeguarding Leads will operate in in West Yorkshire police force area and the South West (Avon and Somerset, Devon and Cornwall, Dorset, Wiltshire and Gloucestershire police force areas). Cases outside of these locations will be managed through the existing process, as set out in the existing Competent Authority guidance, here

<https://www.gov.uk/government/publications/victims-of-trafficking-guidance-for-competent-bodies>.

1.1. Background

As part of implementing the Council of Europe Convention on Action against Trafficking in Human Beings ('the Convention') in 2009, the UK Government created the National Referral Mechanism (NRM). The NRM is a victim identification and support process which is designed to make it easier for the agencies involved in modern slavery cases to cooperate. The NRM allows organisations such as the police, Home Office, Border Force, local authorities and non-governmental organisations (NGOs) to share information about potential victims and help them to access advice, accommodation and support.

The Convention 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 tackle human trafficking is to provide services to help victims recover and access justice.

In July 2015, following a review (see below) the NRM was extended to cover victims of slavery, servitude and forced or compulsory labour, as well as human trafficking victims in England and Wales. The term used for these forms of exploitation is 'modern slavery' and will be used throughout this document. A victim-centred approach should also be applied to victims of all forms of modern slavery.

1.2. NRM review and pilots

In April 2014 the Home Secretary commissioned a thorough review of the NRM. The review reported on 11 November 2014 and recommended that the support system for identifying and supporting victims of people trafficking should be overhauled. The full report is available here

<http://webarchive.nationalarchives.gov.uk/20141202113128/https://nrm.homeoffice.gov.uk/documents/2014/11/nrm-final-report.pdf>.

The key recommendations in 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 Slavery Safeguarding Leads, supported by increased training and feedback
- establishing new multi-disciplinary panels, headed by an independent Chair, with a view to ceasing the sole decision-making roles of UK Visas & Immigration (UKVI and the UKHTC
- creating a single case working unit within the Home Office to replace the current case-working units in the National Crime Agency and UKVI

The Home Secretary welcomed the findings of this report which acknowledge 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.

In July 2015 the Home Office, in consultation with civil society and operational delivery partners, launched a pilot to test these recommendations in two locations:

1. West Yorkshire police force area
2. The South West (Avon and Somerset, Devon and Cornwall, Dorset, Wiltshire and Gloucestershire police force areas).

1.3. Existing NRM Process and Pilot Process

1.3.1. Existing process

The existing system involves a specified list of 'First Responder' organisations that can refer cases to a 'Competent Authority' to decide whether an individual has been a victim of modern slavery. These 'First Responders' include certain Non-Governmental Organisations (NGOs) and public authorities.

The Competent Authority first makes a 'Reasonable Grounds' decision which means they 'suspect but cannot prove' that someone is a victim. The Competent Authority then gathers more evidence and information about the case before making a 'Conclusive Grounds' decision. This has a higher threshold and means that on the evidence available 'it is more likely than not' that they are a victim.

The two Competent Authorities are the UK Human Trafficking Centre (UKHTC) in the National Crime Agency (NCA) and the Home Office which handles cases from outside the EEA.

1.3.2. Pilot process

Local agencies and authorities have a key role in identifying, referring and supporting potential victims of human trafficking and other forms of modern slavery, and the NRM review recommended enhancing the role of local areas in this process.

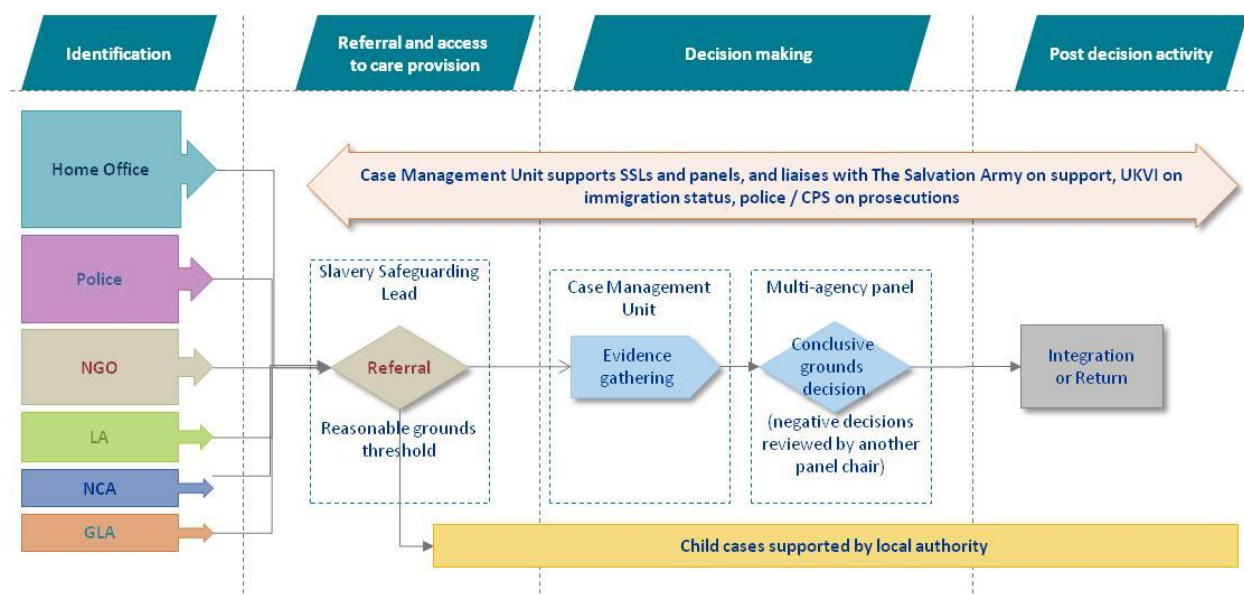
The pilots will establish two new roles to do this:

Slavery Safeguarding Leads (SSL) – A number of individuals from local statutory agencies will be identified as Slavery Safeguarding Leads in the pilot areas. They will accept referrals and then decide whether they believe the referred individual is a victim of modern slavery. SSLs will be the Competent Authorities responsible for the Reasonable Grounds decision in pilot areas.

Regional multi-disciplinary panels ('the panel') – These panels will be comprised of a number of representatives from statutory agencies (Local Authorities, police, NHS, UK Visas and Immigration) and NGOs, and will be chaired by an individual appointed by the Home Office. The panels will make decisions on whether an individual is a confirmed victim of modern slavery. The Chairs of the panels will also be responsible for reviewing negative decisions made by other panels. Panels will be the Competent Authorities for the Conclusive Grounds decision in pilot areas.

The new process will be supported by a **central Case Management Unit (CMU)**. This unit will receive cases from SSLs, collect additional evidence to prepare a case file for each referral and then coordinate the panel meetings where the Conclusive Grounds decisions will be made.

The pilot process



1.4. Which cases are part of the 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 relevant police force areas (Avon and Somerset, Devon and Cornwall, Dorset, Gloucestershire, West Yorkshire, and Wiltshire) at the point of referral.

If you are unsure whether a case falls into one of the police force areas you can check the relevant postcode on <https://www.police.uk/>. A map of police force areas in England and Wales is also available here: <https://www.justiceinspectorates.gov.uk/hmic/media/police-force-map.pdf>.

Scenario	Pilot case?
Potential victim has been physically encountered by a frontline worker within one of the pilot locations.	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 (e.g. Leeds asylum team), but is the first frontline worker to identify the person as a potential victim	YES.
Potential victim is physically located in one of the pilot locations. They are identified by a frontline worker with responsibilities for the pilot area, who is physically located outside of the pilot area (e.g. the TSA helpline based in Birmingham, the Cardiff asylum team which is responsible for the South West)	YES. In these cases referral must still be made via an SSL within the pilot regions, not via UKHTC.
Individual encounters frontline workers 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 (e.g. potential victim encounters the police in pilot area, but NRM referral not made. They leave the area and then claim asylum outside of the pilot areas when the NRM referral is made).	NO. Non-pilot process to be followed.

Exclusions: cases that are within immigration detention, the prison estate, or that are being managed by Home Office Criminal Casework will be excluded from the pilots and will continue to be managed by existing Competent Authorities.

1.5. SSL Role and Responsibilities

This section explains the role and responsibilities of SSLs.

Slavery Safeguarding Leads have a vital role in decision making on modern slavery cases. They make the first decision (called a 'Reasonable Grounds' decision) about whether an individual is a victim of modern slavery.

SSLs will be drawn from a limited range of public authorities who are likely encounter potential of modern slavery SSLs will be trained and provided with guidance to make Reasonable Grounds decisions about whether an individual is a potential victim of modern slavery. They will advise others about how to identify victims of modern slavery and support them in completing NRM referrals. SSLs will also work within their organisations to raise awareness of modern slavery and encourage referral of potential victims to the NRM.

SSLs must ensure that their organisation has appropriate cover arrangements at all times, so there may be more than one SSL in an organisation depending on its size. Modern slavery victims may require immediate support and it is vital that appropriate individuals are available to deal with potential cases.

1.6. Step-by-Step SSL Process

- A frontline worker or an SSL encounters someone who they think might be a victim of modern slavery.
- If it is a frontline worker, they contact their local on-duty SSL. The SSL explains that they need to complete an 'NRM form' to refer the potential victim into support. SSLs should make their details known within their organisation.
- For adults, the NRM form is explained to the potential victim and they are asked if they consent to the form being filled out for their case. They must consent to enter the NRM.
- 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. It is good practice to consult the child in making the NRM referral, explaining the purpose, concerns, benefits and the possible outcomes, where appropriate.
- Following consent from the potential victim / in the case of a child, the SSL helps the frontline worker to complete the NRM form (or completes it themselves). They include as much information about the case as possible, and explain why they think the individual is a victim of modern slavery.
- The SSL then considers the case and decides whether they think there are 'Reasonable Grounds' to believe that the individual is a victim. The Reasonable Grounds decision should be made as soon as practicable from the case being received by the SSL, ideally on the same working day. This will ensure that potential victims can access support quickly.
- The SSL will then write a short decision minute explaining their reasonable grounds decision. The SSL is responsible for verbally informing the victim of the decision and next steps (if they are not with the potential victim they should ensure this is relayed by the frontline worker, or speak to the victim on

the telephone). A formal letter notifying the decision will be issued to the potential victim by CMU within three working days.

- If the decision is positive, the SSL should call The Salvation Army (TSA) to arrange for the potential victim to be supported, where the potential victim has requested support. Once the SSL has confirmed the positive RG TSA will liaise with whoever is with the victim (SSL or frontline worker) to establish the potential victim's support needs.
- The SSL should send the NRM form, their decision minute and any other supporting documentation to the CMU on the same day as the decision is made, in order for CMU to issue the Reasonable Grounds decision letter (and, where a positive decision was made, begin preparing the case for the multi-disciplinary panel).
- The SSL may be contacted by CMU for further information to help the decision-making panel to make a Conclusive Grounds decision, or to ask them to consider more information that has been provided about a case with a negative decision.

2. What is modern slavery?

2.1. Myths about modern slavery

SSLs need to be able to separate myth from reality relating to modern slavery and its victims.

Myth	Reality
The person did not take opportunities to escape so is not being coerced	Remaining in an exploitative situation could indicate a willingness to remain there and/or an absence of coercion. But there are many reasons why someone may choose not to escape an exploitative situation, for example: <ul style="list-style-type: none"> ● fear of reprisal for the person or for family members at home ● vulnerability ● Stockholm syndrome (psychological dependency on the person exploiting them) ● lack of knowledge of their environment ● grooming ● belief that the trafficker or modern slavery facilitator will fulfil their promise ● fear of witchcraft ● violence or threats of violence not knowing how and where to seek help
UK nationals cannot be victims of modern slavery.	UK nationals can and have been victims of modern slavery.
Crossing a border is required in order to be trafficked.	Trafficking does not have to occur across borders; it can occur within a country.
Modern slavery is a necessary evil in some cultures and so must be accepted.	Abusive people may use 'culture' as a justification for modern slavery/trafficking other human beings. Modern slavery is a crime in the UK and child modern slavery is child abuse, not a 'cultural' issue.
It cannot be modern slavery when organiser and victim are related, married, living together or lovers.	Close relationships are often used to exploit and control others. This is especially relevant in child modern slavery. There have been numerous incidents where 'boyfriends' have groomed women and children into sexual

	exploitation or family members have colluded (intentionally or unintentionally) in the exploitation.
A person is not a victim of modern slavery when they say they have a better life than previously.	Some people are willing to tolerate their situation because they may perceive it as a 'stepping stone' to a better future and may compare it favourably to experiences at home. This doesn't mean they are not a victim of modern slavery.
A person is not a victim of modern slavery when they reject an offer of help.	It is not uncommon for victims to reject offers of help at first. This is not unique to victims of modern slavery.

2.2 What is modern slavery?

Modern slavery encompasses:

1. human trafficking,
2. slavery, servitude and forced or compulsory labour.

In all UK referrals, the Competent Authority must consider whether the person is a victim of human trafficking. If someone is found not to be a victim of trafficking, the Competent Authority must go on to consider whether they are the victim of another form of modern slavery, which includes slavery, servitude and forced or compulsory labour.

2.3 Human trafficking

The essence of human trafficking is that the victim is coerced or deceived into a situation where they are exploited. Article 4(a) of the Council of Europe Convention on Action against Trafficking in Human Beings (the Convention) defines 'human trafficking' 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.'

Human trafficking consists of three basic components:

Action + Means + Exploitation

As noted in the Office of the United Nations High Commissioner for Refugees (UNHCR) guidelines on international protection:
<http://www.unhcr.org/443b626b2.html>

‘An important aspect of this definition is an understanding of trafficking as a process comprising a number of interrelated actions rather than a single act at a given point in time. Once initial control is secured, victims are generally moved to a place where there is a market for their services, often where they lack language skills and other basic knowledge that would enable them to seek help. While these actions can all take place within one country’s borders, they can also take place across borders with the recruitment taking place in one country and the act of receiving the victim and the exploitation taking place in another. Whether or not an international border is crossed, the intention to exploit the individual concerned underpins the entire process.’

ACTION	recruitment, transportation, transfer, harbouring or receipt, which includes an element of movement whether national or cross-border; which is achieved by a
MEANS	threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability; for the purpose of
EXPLOITATION	e.g. sexual exploitation, forced labour or domestic servitude, slavery, financial exploitation, illegal adoption, removal of organs).

All three components must be present in an adult trafficking case. However, in a child trafficking case the ‘means’ component is not required as they are not able to give informed consent.

Child human trafficking will therefore consist of two basic components

Action + Exploitation

ACTION	recruitment, transportation, transfer, harbouring or receipt, of child which includes an element of movement
--------	--

	whether national or cross-border;
EXPLOITATION	e.g. sexual exploitation, forced labour or domestic servitude, slavery, financial exploitation, illegal adoption, removal of organs of child

The definition of trafficking is not met unless all the constituent components are there, even if one or more is present.

Guidance on the components of human trafficking

As explained above, human trafficking consists of three basic components:

Action + Means + Exploitation

Action

To be a victim of human trafficking the person needs to be subjected to the act of:

- recruitment
- transportation
- transfer
- harbouring, or
- receipt.

As noted in the Office of the United Nations High Commissioner for Refugees (UNHCR) guidelines on international protection:

‘An important aspect of this definition is an understanding of trafficking as a process comprising a number of interrelated actions rather than a single act at a given point in time. Once initial control is secured, victims are generally moved to a place where there is a market for their services, often where they lack language skills and other basic knowledge that would enable them to seek help. While these actions can all take place within one country’s borders, they can also take place across borders with the recruitment taking place in one country and the act of receiving the victim and the exploitation taking place in another. Whether or not an international border is crossed, the intention to exploit the individual concerned underpins the entire process.’

Means

An adult victim of human trafficking must have been subject to a ‘means’– the threat or use of force or other form of coercion to achieve the consent of a person having control over another person.

The apparent consent of a victim to be controlled and exploited is irrelevant when one or more of the following has been used to get that consent:

- the threat or use of force
- abduction
- fraud
- deception
- the abuse of power or of a position of vulnerability
- the giving or receiving of payments or benefits.

It is not necessary for there to have been means for a child to be a victim, because children cannot give informed consent. Any child who is recruited, transported, or transferred for the purposes of human trafficking is considered to be a potential victim, whether or not they have been forced or deceived. See Child Victims in [Section 9](#) for further guidance on handling a child's case

A potential victim of trafficking who may have been a victim as a child, but only identified and referred into the NRM after reaching adulthood is treated under child criteria in assessing whether they were trafficked. The practical effect of this is that they do not have to meet the means test.

Different types of *means* that may be present in human trafficking cases are explained below.

Trafficking: Means: Deception

An example of deception may be that the recruiter or employer has provided the worker with maliciously false, inaccurate, or misleading information. For example, a person who ends up being exploited through prostitution may originally have been under the impression there were legitimate education or employment opportunities (for example in the service industry, as a dancer, or for childcare).

There are also less straightforward cases, for example where people have been aware they would be working consensually in the sex industry in the UK but they were misled as to the conditions of the environment, particularly the degree of control (over freedom and earnings) before they arrived. Where the situation such individuals find themselves in amounts to exploitation, this could be a modern slavery case.

Trafficking: Means: Physical coercion

Physical coercion refers to the threat of the use of force or the actual use of force against the victim of trafficking or their family members. Physical coercion could also be more subtle measures of control, for example withholding travel or immigration documents.

Trafficking: Means: Psychological coercion

Psychological coercion refers to the threat or the perceived threat to the victim's relationships with other people. Examples of psychological coercion include:

- blackmail;
- ritual oaths - there is evidence to suggest witchcraft or ritual oaths can also be used to make children fearful and compliant;
- forcing someone to pay an excessive amount of money for substandard accommodation;
- making significant deductions from an individual's 'salary';
- threats of rejection from, or disapproval by, a peer group, family;

There does not necessarily have to be a direct personal relationship in psychological coercion. It could refer to wider issues, for example social stigma. This is particularly relevant in cases involving sexual exploitation or other forms of sexual violence.

Other examples include:

- Grooming - where vulnerable individuals are enticed over time to take part in activity in which they may not be entirely willing participants (for example, a trafficker may present themselves as a 'boyfriend' in a sexual exploitation case).
- Stockholm syndrome - where due to unequal power, victims create a false emotional or psychological attachment to their controller.

In both of these examples the individuals can often first appear to be 'willing participants'. Due to their age and dependent status, children are especially vulnerable to physical and psychological coercion.

Trafficking: Means: Complex cases

There are also more complex cases where victims have been trafficked and subjected to exploitation in their own countries, and after escaping their situation travel to the UK to continue working in similar industries without such obvious control over movement or freedom.

An example of this may be where a child has been sexually exploited in their home country and then travels to the UK as an adult to work in prostitution. At first it may appear the individual is a willing participant, but you must consider any progression of control and coercion when you make your decision.

Exploitation

To be a victim, someone must have been trafficked for the purpose of 'exploitation' which may take the form of:

- sexual exploitation
- forced labour or services
- slavery or practices similar to slavery
- servitude
- forced criminality, or
- removal of organs (also known as organ harvesting)

Trafficked for the ‘purpose of exploitation’ – what if someone hasn’t yet been exploited?

Under the Convention, a person is a ‘victim’ even if they haven’t been exploited yet, for example because a police raid takes place before the exploitation happens.

This is because, under the definition of trafficking, trafficking occurs once certain acts are carried out for the purpose of exploitation. So, it is the purpose which is key, rather than whether or not exploitation has actually occurred. Even if the UK authorities intervene and prevent exploitation taking place in the UK, victims may have experienced serious trauma in their home country or on the way to the UK and may still be in need of support.

Trafficking: Exploitation: Sexual exploitation.

In the most cases involving human trafficking for the purpose of sexual exploitation, the victim is female; however, it is important to be aware that there are also male victims.

Female victims of sexual exploitation

The majority of female victims of trafficking identified in the UK are exploited through prostitution. Many are beaten, raped and abused. They may go abroad based on false promises of good jobs and economic opportunities, often out of ambition to earn money and make a better life for their children or family.

The forcible or deceptive recruitment of women and girls for forced prostitution or sexual exploitation is a form of gender related violence. For more information on gender related violence, see links below:

- Violence against women and girls
- Stolen Smiles: a summary report.

<https://www.gov.uk/government/policies/violence-against-women-and-girls>

<http://www.lshtm.ac.uk/php/ghd/docs/stolensmiles.pdf>

There is no typical experience of people who have been trafficked for sexual exploitation. Some are held captive, assaulted and violated. Others are less abused physically, but are psychologically tormented, and live in fear of harm to themselves and their family members. The way in which different people describe their experiences means you must not rely on victims to self-identify in explicit or obvious ways.

Male victims of sexual exploitation

Male victims of sexual exploitation may have additional barriers to disclosure. There is currently a limited research base to assess the exact extent of adult male sexual exploitation.

Child victims of sexual exploitation

Please refer to the detailed guidance regarding children who are being sexually exploited. See link below to Safeguarding children from sexual exploitation.

<https://www.gov.uk/government/publications/safeguarding-children-and-young-people-from-sexual-exploitation-supplementary-guidance>

Trafficking: Exploitation: Forced labour

Forced labour is not restricted to a particular sector of the labour market but cases have been identified in these sectors:

- Manufacturing;
- food processing;
- agriculture; and
- hospitality.

For forced labour within the home see the domestic servitude section.

As with other forms of trafficking related exploitation, a high level of harm and control or coercion is needed to trigger the UK's obligation under the Council of Europe Convention on Action against Trafficking in Human Beings.

Forced labour represents a severe violation of human rights and is a restriction of human freedom.

The International Labour Organisation (ILO) define forced work as:
'All work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself voluntarily.'

This definition is a useful indication of the scope of forced labour for the purposes of human trafficking. The European Court of Human Rights in *Siliadan v France* took this as starting point for considering forced labour threshold and held that for forced labour, there must be work:

- exacted under the menace of any penalty, which is performed against the will of the person concerned, that is, for which the person has not offered themselves voluntarily.

Forced labour cannot be equated (considered) simply with:

- working for low wages and/or in poor working conditions, or
- situations of pure economic necessity, as when a worker feels unable to leave a job because of the real or perceived absence of employment alternatives.

For more information on the indicators of trafficking, see the Frontline Staff guidance.

Trafficking: Exploitation: Forced criminality

Forced criminality is understood as the exploitation of a person to commit:

- pick-pocketing
- shop-lifting
- drug cultivation, and
- other similar activities which are subject to penalties and imply financial gain.

As noted in European Directive 011/36/EU, these must be understood as a form of forced labour or services as defined in the 1930 ILO Convention (No. 29) concerning Forced or Compulsory Labour.

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:101:0001:0011:EN:PDF>

http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029

Therefore, the exploitation of a person for criminal activity only falls within the scope of the definition of trafficking in human beings when all the elements of forced labour or services occur.

Trafficking: Exploitation: Removal of organs (Organ harvesting)

This type of trafficking involves exploiting people by their internal organs, which are used for transplant. Traffickers can force or deceive their victims into giving up an organ. Organs commonly traded are kidneys and liver, but any organ that cannot regenerate and can be removed and re-used could be the subject of this illegal trade.

The World Health Organization (WHO)'s Guiding Principles on Human Organ Transplantation (1991) states the commercialisation of human organs is 'a violation of human rights and human dignity'.

http://www.who.int/transplantation/Guiding_PrinciplesTransplantation_WHA63.22en.pdf

Section 3 of the Human Tissue Act 2004 requires 'appropriate consent' for organ donation. Section 33 of this act outlines the restriction on transplants involving a live donor.

<http://www.legislation.gov.uk/ukpga/2004/30/contents>

The EU Organ Directive (2010/53/EU) requires organ donation to be voluntary and unpaid. However, compensation may be granted to make good the expenses and loss of income related to the donation, but avoids any financial incentive.

The Council of Europe Convention against trafficking in human organs, once it has been adopted by the committee of ministers, will be the first legally binding international instrument devoted solely to organ trafficking.

Trafficking: Exploitation: Domestic servitude

Domestic servitude often involves people working in a household where they are:

- ill treated;
- humiliated;
- subjected to exhausting working hours;
- forced to live and work under unbearable conditions; and/or
- forced to work for little or no pay.

The problems of domestic workers held in servitude are made worse by the fact it is often very difficult for them to leave their employers and seek help. Abusive employers create physical and psychological obstacles by, for example, instilling fear in the domestic slave by threatening them, or their relatives, with further abuse or deportation, or by withholding their passport.

Children living in domestic servitude may not see it as exploitation because they may have been used for domestic servitude in their home countries and it may appear like an extension of the same arrangement. Some children may have been groomed and see the domestic servitude as normal work they have to do in return for food and lodgings. There is evidence to suggest if children are kept in domestic servitude by powerful members of their community or family members they are unable to report the abuse due to the psychological control. For more information on psychological coercion see [Section above](#).

For more information on domestic servitude, see the link below

- United Nations Office on Drugs and Crime - Domestic 'service' or domestic slavery?

<http://www.unodc.org/unodc/en/frontpage/2009/December/domestic-service-or-domestic-slavery.html>

Human smuggling is not human trafficking

SSLs must not confuse human trafficking with people smuggling. Human smuggling occurs when an individual seeks the help of a facilitator to enter the UK illegally, and the relationship between both parties ends once the transaction ends. Many of those who enter the UK illegally do so by this route. Human smuggling is not a form of modern slavery.

The purpose of human smuggling is to move a person across a border illegally, and it is regarded as a violation of state sovereignty. The purpose of modern slavery is to exploit the victim for gain or other benefit and is regarded as a violation of that person's freedom and integrity.

There are several factors which help distinguish smuggling and modern slavery (trafficking).

- With trafficking, a victim's entry into a state can be legal or illegal but smuggling is characterised by illegal entry.
- Trafficking can take place both within and across national borders but international travel is required for smuggling.
- In the case of adults, trafficking is carried out with the use of force and/or deception. Smuggling is not, which indicates it is a voluntary act on the part of those being smuggled.
- Trafficking involves the intended exploitation of people on arrival while the services of smugglers usually end when people reach their destination and the transaction ends.

Unclear cases

Trafficking victims may indeed start out believing that they are being smuggled, will have control over how their debt is repaid and will be free to go about their business once the agreed fee has been settled. Some may well end up in a potentially exploitative situation, where they are debt bonded and forced to work to pay off their 'debts', which in many cases are increased by their trafficker over time to retain control over them. As noted in 'Smuggled or Trafficked?' by Jacqueline Bhabha and Monette Zard (see link below), SSLs must appreciate that in some cases the distinction of smuggling and trafficking can be blurred. There are certainly 'pure' cases of trafficking and smuggling. For example, there may be trafficking cases where children are kidnapped without their parents' consent, or in which migrant workers are defrauded and forced from the outset.

At the other end of the spectrum, there are completely transparent cross-border transportation agreements where a fee is mutually agreed and the relationship between transporter and transported ends upon arrival. However at the point of departure and at multiple stages of the journey, it may well be unclear which category – trafficking or smuggling – is at issue.

In less clear cases, SSLs must consider the information in this section of the guidance and use their judgment in order to reach a decision.

[Smuggled or trafficked?](#)
[by Jacqueline Bhabha and Monette Zard](#)

Slavery, servitude and forced or compulsory labour

Modern Slavery includes trafficking, but also encompasses cases of slavery, servitude and compulsory labour. Some people may not be victims of human trafficking, but are still victims of modern slavery. SSLs must decide whether, if

someone is not a victim of trafficking, they are nonetheless a victim of another form of modern slavery. This section gives guidance on those cases.

In addition to victims of trafficking, modern slavery includes:

- victims of slavery
- victims of servitude
- victims of forced or compulsory labour.

Slavery, servitude and forced or compulsory labour may also be present in trafficking cases. However, not every person who is exploited through forced labour has been trafficked. For example in some cases, a person may have been seriously exploited, but there was no action (element of movement), which means they do not meet the definition of a trafficking victim. In such cases protection and support is still available through the NRM where the person is a victim of slavery, servitude, or forced or compulsory labour in England and Wales, and Discretionary Leave may be available across the UK.

Slavery, servitude and forced or compulsory labour are prohibited by Article 4 of the European Convention on Human Rights and illegal across the UK, but each jurisdiction has its own legislative framework of prohibitions. For the purposes of the NRM the UK recognises that slavery, servitude and forced or compulsory labour have the same meaning as they do under Article 4 of the European Convention on Human Rights. This ensures a consistent approach for victims across the UK.

Modern Slavery: Forced or compulsory labour (victim not trafficked)

UN Convention No. 29 concerning forced or compulsory labour defines “forced or compulsory labour” as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”.

Labour is the provision of any service, not just manual labour. “Penalty” may go as far as physical violence or restraint, but it can also take subtler forms, of a psychological nature, such as threats to denounce victims to the police or immigration authorities when their employment status is illegal. Consent is a factor in forced and compulsory labour, but a victim may have given consent in a situation where they felt they had no viable alternative, in which case they could still be subject to forced or compulsory labour.

For a person to be a victim of forced or compulsory labour there must have been two basic components:

Means + Service

MEANS	threat of penalty – e.g. threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability.
SERVICE	as a result of the means an individual provides a service for benefit, e.g. begging, sexual services, manual labour, domestic service.

However, there does not need to be a means used for children as they are not able to give informed consent.

Child forced or compulsory labour (victim not trafficked as no element of movement) will therefore consist of one basic component:

Service

SERVICE	A child provides a service for benefit, e.g. begging, sexual services, manual labour, domestic service.
---------	---

Where a case meets the test for forced / compulsory labour, they would receive a positive Conclusive Grounds decision The concepts of servitude and slavery are explained below for completeness.

For more information, see the Convention and explanatory report at the links below.

<http://Conventions.coe.int/Treaty/Commun/QueVoulezVous.asp?NT=197&CM=1&CL=ENG>

<http://Conventions.coe.int/Treaty/EN/Reports/Html/197.htm>

Modern Slavery: Servitude

“Servitude” means an obligation to provide a service that is imposed by the use of coercion.

Servitude is an “aggravated” form of forced or compulsory labour. The fundamental distinguishing feature between servitude and forced or compulsory labour is in the victim feeling that their condition is permanent and that the situation is unlikely to change.

Modern Slavery: Slavery

The 1926 Slavery Convention defines slavery as “the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised”.

This concept of ownership is what makes slavery distinct – for example a situation where an individual was being controlled by another would not meet this threshold, unless there was clear evidence the person was being used as a commodity. It is a form of servitude with the additional concept of ownership.

Guidance on the components of modern slavery – slavery, servitude and forced or compulsory labour

This section gives further guidance on the components that apply to victims of slavery, servitude and forced or compulsory labour where the victims have not been trafficked. Because slavery and servitude are more serious forms of forced and compulsory labour, once an SSL has determined whether an individual is a victim of this form of exploitation they can make the NRM decision.

This includes further guidance on the components of:

- Means
- Service

Guidance on the components of modern slavery – slavery, servitude and forced or compulsory labour: Means

For an individual to be a victim of slavery, servitude and forced or compulsory labour where the victims have not been trafficked, they must have been subject to a means, or threat of penalty through which that service was derived.

The UN Convention No. 29 concerning forced or compulsory labour defines “forced or compulsory labour” as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”. “Penalty” may go as far as physical violence or restraint, but it can also take subtler forms, of a psychological nature, such as threats to denounce victims to the police or immigration authorities when their employment status is illegal. Consent is a factor in forced and compulsory labour, but a victim may have given consent in a situation where they felt they had no viable alternative, in which case they could still be subject to forced or compulsory labour.

Slavery, servitude or forced or compulsory labour must include this threat of penalty.

Deception must of itself constitute a threat of penalty to establish means.

Different types of *means* may be present in modern slavery cases are explained below.

Modern Slavery: Means: Physical coercion

Physical coercion refers to the threat of the use of force or the actual use of force against the victim of modern slavery or their family members. Physical coercion could also be more subtle measures of control, for example withholding travel or immigration documents.

Modern Slavery: Means: Psychological coercion

Psychological coercion refers to the threat or the perceived threat to the victim's relationships with other people. Examples of psychological coercion include:

- blackmail
- ritual oaths - there is evidence to suggest witchcraft or ritual oaths can also be used to make children fearful and compliant
- forcing someone to pay an excessive amount of money for substandard accommodation
- making significant deductions from an individual's 'salary'
- threats of rejection from, or disapproval by, a peer group, family, or
- anger or displeasure by the person considered to be a partner by the victim.

There does not necessarily have to be a direct personal relationship in psychological coercion. It could refer to wider issues, for example social stigma. This is particularly relevant in cases involving sexual exploitation or other forms of sexual violence. Other examples include:

- Grooming - where vulnerable individuals are enticed over time to take part in activity in which they may not be entirely willing participants (for example the 'boyfriend' method is fairly common in sexual exploitation).
- Stockholm syndrome - where due to unequal power, victims create a false emotional or psychological attachment to their controller.

In both of these examples the individuals can often first appear to be 'willing participants'. Due to their age and dependent status children are especially vulnerable to physical and psychological coercion.

Modern Slavery: Means: Complex cases

There are also more complex cases where victims have been a victim of modern slavery and subject to exploitation in their own countries and after escaping their situation travel to the UK to continue working in similar industries without such obvious control over movement or freedom.

An example of this may be where a child has been sexually exploited in a home country and then travels to the UK as an adult to work in prostitution. At first it may appear the individual is a willing participant but you must consider any progression of control and coercion when you make your decision.

Modern slavery: Service

For a person to be a victim of slavery, servitude, or forced or compulsory labour where the victims have not been trafficked there must have been a service derived via the threat of penalty.

The UN Convention No. 29 concerning forced or compulsory labour defines “forced or compulsory labour” as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”. Labour is the provision of any service, not just manual labour.

‘Service’ or labour includes forced labour, domestic servitude, sexual services, forced criminality. These forms of service could take place in a variety of industries or in private homes. For more information on these forms of service see the relevant sections within the human trafficking guidance.

Servitude and slavery are more serious forms of forced or compulsory labour. For the purposes of the NRM you will only need to determine whether an individual has been the victim of slavery, servitude, or forced or compulsory labour.

Victim Identification

How to spot a potential victim – Indicators of Modern Slavery

SSLs need to know and understand the signs which may indicate a person is a victim of modern slavery.

Potential victims of modern slavery may:

- be reluctant to come forward with information
- not recognise themselves as having been trafficked or enslaved, or
- tell their accounts with obvious errors.

It is not uncommon for traffickers to provide stories for victims to tell if approached by the authorities and the errors or lack of reality may be because their initial stories are composed 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.

Child victims may find it particularly hard to disclose as the traffickers may have given them inaccurate information about the role of authorities, they may have had bad experiences with corrupt authorities in their home country or during their journey.

A range of common indicators to look out for is provided at **Annex A** and the NRM form provides a list of further indicators.

Explaining the NRM to the potential victim

In England and Wales, the NRM enables adult victims of modern slavery in England and Wales to access Government-funded support, which is currently delivered by The Salvation Army (support is provided by other organisations in Scotland and Northern Ireland).

In order to access this support, adult potential victims must consent to sharing the details of their case with the Competent Authority so that their case can be considered and it can be determined whether they are recognised as a victim of modern slavery.

It is important that the potential victim understands what the NRM is and how their information will be used so that they can fully consent to being referred into the NRM. The SSL should ensure this takes place, either by explaining the process to the victim directly, or by advising the frontline worker on how to do this.

The potential victim should be taken to a place of safety and have the NRM explained to them in a language that they understand, using interpretations services where required. Leaflets on the NRM process are available in a variety of languages and are available here <https://www.gov.uk/government/publications/support-for-victims-of-human-trafficking>.

The potential victim should be made aware of the following points:

- The National Referral Mechanism is a system to identify victims of modern slavery, and provide them with access to help and support.
- It is a voluntary process.
- There are two decisions in the NRM process – a Reasonable Grounds decision which will be made by a local SSL, ideally on the day the victim is referred, and a Conclusive Grounds decision on whether the individual is recognised as a victim of modern slavery, which is made after 45 days by a multi-disciplinary panel.
- After the positive Reasonable Grounds decision and until the Conclusive Grounds decision is made, support is provided by The Salvation Army and a network of charities who can offer safe accommodation and specialist support, dependant on the potential victim's needs. The potential victim will be given access to independent emotional, medical and practical help. This support could include:
 - finding temporary safe accommodation.
 - helping with medical treatment.
 - having someone to help the potential victim cope with their experience.
 - providing an interpreter/translator to help the potential victim communicate in English.
 - independent legal advice.
- Non-British or European Economic Area Nationals will not be removed from the UK whilst their case is being considered by the NRM and, following a positive decision they may be eligible for Discretionary Leave to Remain in the UK, where they are supporting a police investigation, seeking to claim compensation or have compelling personal circumstances as set out in published guidance. If they are not given leave to remain in the UK, recognised victims of modern slavery are able to access enhanced Assisted Voluntary Return packages to safely return home.

The individual should also be made aware that a copy of the NRM form will be shared with the police as they are a potential victim of serious crime. However, there is no requirement for a potential victim to cooperate with the police to receive support under the NRM.

If the victim would like to engage with the police, they will:

- talk to the victim about what has happened
- offer them protection from their exploiters

- start an investigation
- keep the victim informed.

Once a potential victim understands what the NRM is and how their information might be used, if they consent to being referred to the NRM, they should sign the NRM referral form to indicate their consent.

If they do not consent, the frontline worker / SSL is required to complete a duty to notify referral see 'Duty to notify the Home Office of a potential victim of modern slavery'.

Children (including where there is an age dispute but the victim is believed to be a child) do not need to give consent to enter the NRM. It is good practice to consult the child in making the NRM referral, explaining the purpose, concerns, benefits and the possible outcomes, where appropriate. The Local Authority should also be immediately contacted so that they can provide safeguarding and support.

Capacity to Consent

Where an adult is considered vulnerable, for example due to learning difficulties or mental health issues and there are concerns they may not have the capacity to consent to a referral to the NRM, the frontline worker / SSL should follow appropriate safeguarding procedures. It may be appropriate for a social worker to make an assessment of an adult's capacity to consent to a referral.

Frontline workers / SSLs should therefore seek advice from Local Authority social services to ensure that action taken in respect of the potential victim complies with any statutory guidance and legislation in respect of safeguarding vulnerable adults, capacity to consent and mental health. If a social worker agrees that the person does not have the capacity to consent then the social worker must confirm in writing if they consider that the adult should be referred to the National Referral Mechanism. Frontline staff / SSLs must include this written confirmation with the NRM referral form.

Informing the police

A potential victim of modern slavery is a potential victim of a crime. All NRM forms should therefore be referred to the police - either on the victim's behalf where they consent to this information being provided to the police, or as a third party referral where they do not, provided this does not breach any obligation of confidence owed to the victim under the common law. This referral should be made by the frontline worker or, where the referral has not already been made by the time the NRM form is received, the Slavery Safeguarding Lead. The police will then determine what action is appropriate, in line with Home Office Counting Rules.

This does not mean that potential victims are under any obligation to cooperate with the police. There is a separate section in the updated NRM form where they can confirm if they are or are not willing to engage with the police.

The NRM process is already a multi-agency process and when a potential victim consents to enter the NRM, they should be aware that information will be passed on by the frontline worker that they are speaking to in order to access the NRM. It is therefore unlikely that an obligation of confidence would prevent referring this information to the police.

For there to be a breach of an obligation of confidence, the information must:

- have the necessary degree of confidence about it,
- the information must be imparted in circumstances imparting an obligation of confidence, and
- there must be unauthorised use or disclosure of the information resulting in a risk of harm.

If a frontline worker / SSL is unsure whether an obligation of confidence would be breached by referring a case to the police, they should contact their organisation's legal advisor for further guidance.

There is no obligation of confidentiality between the Case Management Unit and the victim, as this information has been received via a third party. The Case Management Unit is therefore entitled to process this information in accordance with the Data Protection Act 1998 and where appropriate refer this information to the police to support the detection and prevention of crime. The Case Management Unit does not require consent from the victim to do so. The intention is to do this in all cases referred into the NRM where there has not already been a police referral.

Police referral action: Frontline worker / SSL

When completing the NRM form, the SSL / frontline worker should explain to the victim that their case will be passed on to the police, as they are a potential victim of crime.

It is important to note that the victim is under no obligation to cooperate with the police to receive support through the NRM. The NRM form includes a section to indicate whether the potential victim is willing to cooperate with the police. If the potential victim indicates they will cooperate, then the police will contact them regarding the allegation, otherwise communication will be with the person who made the third party referral.

As set out in the Home Office counting rules for recording crime, "all reports of incidents, whether from victims, witnesses or third parties and whether crime related or not, will, unless immediately recorded as a crime, result in the registration of an

auditable incident / record by the police” ... “an incident will be recorded as a crime (notifiable offence) for ‘victim related’ offences if, on the balance of probability:

(a) the circumstances of the victim’s report amount to a crime as defined by law (the police will determine this, based on their knowledge of the law and counting rules); and (b) there is no credible evidence to the contrary immediately available. A belief by the victim (or a person reasonably assumed to be acting on behalf of the victim, that a crime has occurred is usually sufficient to justify its recording.)” “Where a report of a crime is made to police and the individual dealing decides not to record it as such then they must make an auditable record of that decision and inform the reporting person why they will not be recording a crime.”

The frontline worker / SSL should check whether a police referral has already been made in relation to this case and, where a referral has not been made, send this form to:

Where the location of the alleged exploitation is known	The police force covering that area (where there have been multiple locations referral should be to the most recent location’s police force)
Where the location of the exploitation is unknown	The police force covering the area where the victim resides at the point of the referral to the police; OR The police force covering the area where the individual was encountered, if the individual does not have a fixed address.
Where the exploitation took place overseas	The police force covering the area where the victim resides at the point of the referral to the police; OR The police force covering the area where the individual was encountered, if the individual does not have a fixed address.

Where the police have not been contacted, the frontline worker / SSL should indicate on the form why not, including where this is because a referral has already been made by another party. Where a crime reference number has been provided, this should be added to the form, but if it is outstanding this should not delay submission of the NRM form.

Criminal investigations and prosecutions (impact on NRM decision-making)

Although an active police investigation or Crown Prosecution Service (CPS) or Crown Office and Procurator Fiscal Service (COPFS) prosecution may give weight to a claim of trafficking or modern slavery offences, potential victims are not obliged to cooperate with the police at any stage in the National Referral Mechanism (NRM) process. When considering the case the SSL must not penalise a potential victim who is unwilling to cooperate with the police.

Duty to notify the Home Office of a potential victim of modern slavery

From 1 November 2015, specific public authorities have a duty to notify, the Secretary of State of any person identified in England and Wales as a suspected victim of slavery or human trafficking. In such cases the frontline worker should send a copy of the NRM form to dutytonotify@homeoffice.gsi.gov.uk. Where a victim does not consent to enter the NRM, a notification form (MS1) should still be completed and sent to this email address. It is for the first specified public authority who encounters the individual to make the notification.

For further information on the duty, and the form to complete, please see <https://www.gov.uk/government/publications/duty-to-notify-the-home-office-of-potential-victims-of-modern-slavery>.

Child victims

In order to determine whether a child is a potential victim of modern slavery SSLs need to understand that child victims of modern slavery may have different characteristics and issues to adult victims.

SSLs must deal with children as a priority because of their vulnerability.

In cases of potential child victims, SSLs must remember that it is not possible for a child to give informed consent, so SSLs do not need to consider the means used for the exploitation – whether they were forced, coerced or deceived etc. You must also keep in mind the child's:

- added vulnerability,
- developmental stage, and
- possible grooming by the perpetrator.

No child's case should be considered without contacting individuals who specialise in children from the Local Authority. The SSL may also seek advice from a relevant expert NGO.

Like victims of other forms of child abuse, a child who is a victim of modern slavery will describe the behaviour that has to be assessed against indicators of child abuse and modern slavery. Children may not be familiar with the words 'slavery' or 'trafficking' or be able to label their experience as abuse.

Where an adult is referred to the NRM on the basis of modern slavery that took place when they were a child, see 'Potential child victims of modern slavery who are now adults'.

Duty to refer child victims to the Local Authority

Potential victims under 18 years of age should be immediately referred to the relevant Local Authority Children's Services by frontline staff.

They are the primary service provider for safeguarding and responding to the needs of a child modern slavery or trafficking victim, regardless of their nationality or immigration status.

The government guidance to safeguard children who may have been trafficked identifies child trafficking as child abuse that requires a child protection response. Frontline staff must make a child protection referral to the relevant Local Authority.

The relevant police force should be informed and involved, so the SSL should discuss this with the Local Authority to be clear who will take responsibility for involving the police.

Identifying potential child victims of modern slavery

A number of children arrive in the UK accompanied by adults who are either not related to them or in circumstances which raise child protection concerns, for example, there may be:

- no evidence of parental permission for the child to travel to the UK or stay with the adult.
- little or no evidence of any pre-existing relationship with the adult or even an absence of any knowledge of the accompanying adult
- evidence of unsatisfactory accommodation arranged in the UK.

These irregularities may be the only indication that the child could be a victim of trafficking and/or modern slavery. Children who are in a trafficking situation are often very reluctant to give information, and often relate their experiences in an inconsistent way or with obvious errors. More often than not this will be because their stories are made up by their trafficker or modern slavery facilitator.

On discovery, children who are victims of modern slavery may not show any obvious signs of distress or imminent harm.

As well as these indicators, those applying to adult victims can also apply to children. For more information on the indicators of modern slavery, see 'Potential child victims of trafficking who are now adults'.

Consent of child victims

As explained above, any child who is recruited, transported or transferred, harboured or received for the purposes of exploitation, or is directed to perform labour is considered to be a potential victim of modern slavery, whether or not they have been forced or deceived. This is because it is not considered possible for children to give informed consent.

Frontline staff must consider any child who has been recruited, transported, transferred, harboured or received for the purpose of exploitation, as a victim of trafficking and/or modern slavery, whether or not they have been forced or deceived.

Even if they understand what is happening, they may still appear to submit willingly to what they think is the will of their parents or accompanying adults.

Parents and relatives may also be involved in the exploitation of the child. Children are likely to be very loyal to their parents or carers so you must not expect them, of their own initiative, to seek protection against such people.

Where an adult was trafficked or was a victim of modern slavery as a child, but only referred to the NRM in adulthood, they will be assessed against the child criteria for the purposes of determining whether they were a victim of modern slavery but as they are an adult at the time of the referral, they must consent to their case being referred to the NRM.

Financial gain involving child victims

Many children are trafficked for financial gain. This can include payment from or to the child's parents. In most cases, the trafficker also receives payment from those wanting to exploit the child once in the UK.

Traffickers specifically target impoverished communities to exploit their vulnerability. Poor and displaced families may hand over care of their children to traffickers who promise to provide them with a source of income, education or skills training, but ultimately exploit them.

For more information, see the link below on UNHCR Handbook for the protection of internally displaced persons.

<http://www.refworld.org/cgi-bin/texis/vtx/rwmain>

School registration

Children trafficked into the country may be registered at a school for a term or longer, before being moved to another part of the UK or abroad. This pattern of registration and de-registration may be an indicator that a child has been trafficked. It has been identified as a particular concern in schools situated near ports of entry, but you must be alert to this possibility in all schools.

However, you must always bear in mind not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, traveller or migrant families – who collectively go missing from school. For more information, see [Safeguarding children who may have been trafficked](#).

Child victims who claim asylum

Some children who are under the control of a trafficker may say they are unaccompanied when claiming asylum. They might have entered the UK with a trafficker who may or may not be a family member. In such cases the trafficker may have told the child that by doing so they will be granted permission to stay in the UK and be entitled to claim welfare benefits.

Potential child victims of modern slavery who are now adults

In some cases, a potential victim of modern slavery may have been a victim as a child, but only identified and referred into the NRM after reaching adulthood. In these circumstances, Frontline staff should treat the potential victim as having been a child at the time of the modern slavery incident and follow the guidance covering children within the NRM decision making process. This means assessing the case as if they were a child against child indicators.

However an adult who enters the NRM who may have been a victim as a child would be treated as an adult for the purposes of support, services and safeguarding, for the purposes of requiring consent to enter the NRM and for immigration leave purposes.

Establishing age

In some cases it can be difficult to determine whether a potential victim is under 18 years of age. Section 51 of the Modern Slavery Act 2015 requires that if a public authority providing victim support functions under the NRM has reasonable grounds to believe that the person may be under 18, they must assume that the person is under 18 until an Age Assessment has been carried out.

This means that SSLs should always assume that a potential victim is under 18 where there are reasonable grounds to believe that they might be until an age assessment is carried out. In practice, this means that if there are reasonable grounds to believe the potential victim is under 18, the SSL should immediately refer them to the Local Authority to be supported and safeguarded. The Local Authority will also then be able to arrange for an Age Assessment if necessary.

If an Age Assessment is conducted and determines that the potential victim is an adult, the Local Authority should notify the CMU. They should also ask the individual if they consent to their information remaining in the NRM and if they do not consent, they should tell the CMU to stop progressing the case, and to anonymise their case file for this case. The SSL should explain this process to the Local Authority when they refer the case and should provide the Local Authority with contact details for CMU.

It may be the case that the potential victim challenges the outcome of an Age Assessment. The SSL and decision-making panel must accept the determination of the Local Authority Age Assessment until such time as any challenge is concluded.

Further guidance on child victims

The Child Trafficking Advice Centre (CTAC), part of the National Society for the Prevention of Cruelty to Children (NSPCC), operate a child trafficking advice and information line which offers direct assistance to professionals dealing with children who show signs of having been trafficked.

They have a national remit and are staffed by qualified social workers and a police liaison officer. They can offer staff in the Competent Authority advice on how to address the child's needs and your statutory duties in regard to safeguarding children from harm. It also offers guidance by telephone and a case consultancy service by appointment in addition to free training on child trafficking. The advice line number is 0808 800 5000.

Potential child victims charged with criminal or immigration offences

The situation a victim of modern slavery is found in may implicate them in a criminal or an immigration offence. If the SSL has made a Reasonable Grounds decision that the person is a victim of modern slavery the Case Management Unit will make sure those pursuing action for offences committed (for example, the Home Office, police, CPS) are aware of the identification decision.

Where there is reasonable suspicion a child who has committed a crime may have been trafficked and exploited, the SSL must take a child welfare response. The immediate priority in such cases is to safeguard and promote the welfare of the child. All relevant assessments, including those undertaken by the NRM, must be completed in a timely manner (quickly) to allow the police and CPS to take an informed decision on whether to progress the charges against the child. It is vital that contact is made with the police and CPS or COPFS to make sure children who may have been victims of modern slavery can be properly assessed before charges being brought or court proceedings conclude. For more information, see the links below:

- [Safeguarding children who may have been trafficked](#)
- [ACPO Lead's on Child Protection and Cannabis Cultivation on Children and Young People Recovered in Cannabis Farms.](#)

Completing the NRM form

The NRM form is a document that allows frontline workers and SSLs to record details about a case. It must be completed in order for the SSL to refer a case to the Case Management Unit (CMU).

It should be used by the frontline responder / SSL to provide as much information as possible about the case. Whoever first encounters the potential victim, whether a frontline worker or an SSL, should complete the NRM form. If a frontline workers identified the potential victim, the SSL can provide them with the NRM form and help them to fill it out. The forms and accompanying guidance are available [here](#). There are separate forms for children and adults.

Once they receive the NRM form, the SSL should complete the relevant 'consideration minute' setting out why they have made a positive or negative Reasonable Grounds decision, based on the information provided on the NRM form.

Although the NRM form is not an interview record this does not prevent the frontline worker from approaching the potential victim to obtain further details where appropriate, while avoiding placing the potential victim under unnecessary additional stress or trauma.

Individuals who encounter a victim and are completing the NRM form may be unable to provide significant detail about the individual and their potential modern slavery experience, for example where an individual is seriously traumatised.

However, it is important that all pertinent information available at this stage is provided on the form to support a timely Reasonable Grounds decision by the SSL. The person completing the NRM form should make every effort to provide as much information as possible.

If further information about the case subsequently comes to light, this should be referred to CMU by email to NRMpilot@homeoffice.gsi.gov.uk.

The Reasonable Grounds Decision

When an SSL receives a referral, they must first check that the case has not already been considered and referred to the CMU by a different SSL. To do this the SSL should call the CMU, and provide the name and date of birth of the individual.

Where there is a match the case files should be accessed and the CMU and SSL should establish whether this is a claim following a new incident of slavery, or a duplicate claim (individuals cannot receive NRM support more than once for the same period of modern slavery). If it is a duplicate claim, information gathered should be sent to the CMU who will add it to the case file where a decision is outstanding, or consider whether it amounts to new information where a negative decision has previously been made.

Where the referral has happened outside normal working hours, the same checks for duplicate cases should be carried out as soon as possible the next working day. In such cases the SSL should give a pending Reasonable Grounds decision, subject to checks. The potential victim can still access TSA support with a positive pending decision where this is needed urgently.

If it is a new case, the SSL should seek to decide as quickly as possible (at most within one working day) whether on the information available it is reasonable to believe that a person is a victim of the crime of modern slavery.

If the referral relates to an existing case, but provides new information the information should be passed straight to the CMU. CMU will then send this information to the SSL who made the negative Reasonable Grounds decision to review and agree whether this relates to an existing NRM referral or a new referral for a different period of exploitation.

If the referral is simply a duplicate of a previous referral, and provides no new information, the SSL should explain to the frontline worker and potential victim that the case cannot be referred into the NRM as it is a duplicate case.

Standard of proof

The test the SSL must apply is:

- whether the statement 'I suspect but cannot prove (the person is a victim of human trafficking / modern slavery)' 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 had been a victim of human trafficking or modern slavery.

This is a low threshold (lower than the criminal or Conclusive Grounds tests) designed to facilitate quick decisions.

Indicators of all forms of modern slavery are likely to be similar. It may not be initially clear to the SSL whether a potential victim has been subject to human trafficking or slavery, servitude, or forced or compulsory labour. If there is enough evidence to

suspect human trafficking may have occurred, then a positive RG on the basis of trafficking should be given. If there is not enough evidence to suggest trafficking has occurred, but the SSL suspect slavery, servitude or forced labour has taken place, a positive RG should be given on that basis. Otherwise the case would receive a negative Reasonable Grounds decision.

Considering the evidence

SSLs should base their decisions on the information on the NRM form, and any additional information that they have access to or that is provided by the frontline worker (e.g. asylum interview record, police report).

“Reasonable grounds” 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 (indicator) by the person concerned

A well completed NRM form should be able to establish that an individual meets the “Reasonable Grounds” threshold – by providing full information on the victim’s situation and the indicators that have led the frontline worker to refer the case.

Where it appears that the reasonable grounds test may be negative the SSL must contact the frontline worker to discuss their decision and give them the opportunity to provide any further information/evidence that may be available.

How to assess credibility when making a Reasonable Grounds decision

SSLs need to assess whether a potential victim’s account of modern slavery is credible when making a Reasonable Grounds decision. It is important that SSLs bear in mind the low threshold of proof for the decision – ‘suspect but cannot prove’.

Assessing credibility – general

SSLs are entitled to consider credibility as part of their decision making. When SSLs are assessing the credibility of an account, they must consider both the external and internal credibility of the material facts.

If they fit the definition of human trafficking / modern slavery, there is reliable supporting evidence and the account is credible to the required standard of proof, SSLs should recognise the person as being a victim of human trafficking / modern slavery.

In cases of child trafficking, SSLs must keep in mind the child’s:

- added vulnerability;
- developmental stage; and
- possible grooming by the traffickers and modern slavery facilitators

Assessing credibility - Material facts

In assessing credibility SSLs should assess the material facts of past and present events (material facts being those which are serious and significant in nature) which may indicate that a person is a victim of human trafficking / modern slavery. It is generally unnecessary, and sometimes counter-productive, to focus on minor or peripheral facts that are not material to the claim.

SSLs should assess the material facts based on the following:

- Are they coherent and consistent with any past written or verbal statements?
- How well does the evidence submitted fit together and does it contradict itself?
- Are they consistent with claims made by witnesses and with any documentary evidence submitted in support of the claim or gathered during the course of your investigations?

Where there is insufficient evidence to support a claim that the individual is a victim of modern slavery (for example where the case is lacking key details, such as who exploited them or where the exploitation took place) SSLs are entitled to question whether the Reasonable Grounds threshold is met. However, SSLs must also consider whether you need more information.

Assessing credibility – detail and consistency

Level of detail

The level of detail with which a potential victim presents their claim is a factor when SSLs assess credibility. It is reasonable to assume that a victim giving an account of their human trafficking/ modern slavery experience will be more expressive and more likely to include sensory details (for example what they saw, heard, felt or thought about an event) than someone who has not had this experience.

Where there is insufficient evidence to support a claim that the individual is a victim of human trafficking/modern slavery SSLs are entitled to question whether the Reasonable Grounds threshold is met. However, SSLs must also consider whether you need more information.

Consistency

It is also reasonable to assume that a potential victim who has experienced an event will be able to recount the central elements in a broadly consistent manner. A potential victim's inability to remain consistent throughout their written and oral accounts of past and current events may lead SSLs to disbelieve their claim.

Due to the trauma of human trafficking/modern slavery, there may be valid reasons why a potential victim's account is inconsistent or lacks sufficient detail.

Assessing credibility – considering gender and culture

SSLs need to know how to consider gender and cultural issues in considering credibility.

When making Reasonable Grounds decisions SSLs must take into account the individual position and personal circumstances of the person and consider culture and gender issues.

Men and women from the same country of origin may have different experience due to their cultural, ethnic, gender and sexual identity. Women may be unable to disclose relevant details due to cultural and social norms.

Assessing credibility – mitigating circumstances

SSLs need to know about the mitigating circumstances which can affect whether a potential victim's account of human trafficking/modern slavery is credible.

When SSLs assess the credibility of a claim, there may be mitigating reasons why a potential victim of human trafficking/modern slavery is incoherent, inconsistent or delays giving details of material facts. SSLs must take these reasons into account when considering the credibility of a claim. Such factors may include, but are not limited to, the following:

- trauma (mental, psychological, or emotional)
- inability to express themselves clearly
- mistrust of authorities
- feelings of shame
- painful memories (including those of a sexual nature).

Children may be unable to disclose or give a consistent credible account due to additional factors such as:

- their age
- the on-going nature of abuse throughout childhood, and/or
- fear of traffickers or modern slavery facilitators, violence, or witchcraft.

Delayed disclosure

A key symptom of post-traumatic stress is avoidance of trauma triggers, or of those things that cause frightening memories, flashbacks or other unpleasant physical and psychological experiences. Because of these symptoms a person may be unable to fully explain their experience until they have achieved a minimum level of psychological stability. SSLs must not view a delay in disclosing of facts as necessarily manipulative or untrue. It may be the result of an effective recovery

period and the establishment of trust with the person to whom they disclose the information.

Difficulty recalling facts

As a result of trauma, victims in some cases might not be able to recall concrete dates and facts and in some cases their initial account might contradict their later statement. This may be connected to their traumatic experience. However, the need to be sensitive does not remove the need to assess all information critically and objectively when an SSL considers the credibility of a case.

Assessing credibility – potential prosecution of traffickers/facilitators of modern slavery

SSLs need to know about how prosecution of traffickers or facilitators of modern slavery impacts Reasonable Grounds decisions.

When an SSL is deciding whether there are Reasonable Grounds that a person is a victim of trafficking/modern slavery, their decision may be influenced by whether the alleged trafficker or facilitator or modern slavery is being prosecuted. However, their decision must not be dependent on:

- there being a criminal investigation, or
- whether the victim cooperates in any criminal proceedings.

The victim identification process is independent of any criminal proceedings against those responsible for the human trafficking/ modern slavery. The criminal standard of proof, that is 'beyond all reasonable doubt', is higher than that of the Reasonable or Conclusive Grounds test.

Disclosure

SSLs must be aware that their decision minutes and any correspondence could be subject to disclosure in any subsequent prosecution for trafficking/modern slavery, as well as in any future Judicial Review or other litigation relating to the NRM decision. Where an individual is being treated by the police as a potential victim and/or witness, the SSL must make sure lines of communication with the senior investigating police officer are kept open.

The decision as to whether there is enough evidence to meet the reasonable ground test rests with the SSL. SSLs must be alert to the impact that the decision may have, not only on the victim, but on a criminal investigation and the criminal justice process.

View of experts during the NRM process

Evidence from Local Authorities and support organisations

Although police and intelligence reports can provide objective evidence to strengthen a claim, SSLs must give due weight to the reports and views of:

- the Local Authority children's services (for child victims); and
- the organisation supporting the individual.

When SSLs are deciding children's cases it is essential that they develop good working relations with the Local Authority social workers and other practitioners who have worked on the referral.

These organisations may have spent most time with the potential victim and established a degree of trust. Exploited people often don't trust or are afraid of the police or immigration officials. They may therefore not be willing to provide statements to law enforcement. In such circumstances non-governmental organisations may be able to provide more information on the individual's situation and you must consider any such supporting evidence. SSLs must also take into account any medical reports submitted, particularly those from qualified health practitioners.

Weight to give to expert reports

Potential victims of modern slavery may rely on documentary evidence to support their claim in the NRM.

Experience and qualifications of the individual providing the supporting evidence will be relevant in considering what weight to attach to an expert report and every case must be considered on its merits. However if there are clear, robust reasons why the reasonable or Conclusive Grounds test is not met, there is no requirement to accept the assessment of an expert report simply because it states the Reasonable Grounds test is met.

The individual writing the report may not have access to the full range of information available to the SSL and all relevant evidence, including any documentary evidence, must be considered when making a Reasonable Grounds decision.

Where an expert report is considered when assessing a claim under the NRM, and other information is available, all the information and relevant reports should be considered. If there are several expert reports all must be taken into account. A decision should not rely on an expert report alone without considering all relevant information. A decision should not rely on an expert report without making independent enquiries into the potential victim's circumstances and credibility.

Where a potential victim of modern slavery relies on medical evidence it should be from a medical practitioner who is qualified in the appropriate field including

information such as the relevant physical or mental condition, when that condition has been diagnosed and why that condition or any treatment relating to it is relevant to human trafficking / modern slavery.

Any evidence supplied must be capable of being verified by the CMU where appropriate.

Assessing victims who were exploited overseas or historic claims in the UK (Historic claims)

A person who claims to have been trafficked or exploited overseas who subsequently travels to the UK of their own accord, independent of their alleged trafficker, and passes through a number of countries on the way, may still be considered to be a victim of trafficking for the purposes of the Council of Europe Convention on Action against Trafficking in Human Beings (the Convention) provided they satisfy all three elements of trafficking. This is because, although they may be far removed from their trafficking situation, they may still have been subjected to exploitation and may therefore be considered a victim of trafficking under the Convention. They may also still be traumatised by their experience.

Equally a person may have been exploited in the UK some time ago and still be traumatised by their experience.

These scenarios are often referred to as historic claims as they might be referred to the NRM long after the exploitation has ended.

A person who presents themselves as a victim must be physically in the UK in order to receive National Referral Mechanism (NRM) related protection and assistance under the Convention.

Criminal investigations and prosecutions – impact on NRM decision-making

Although an active police investigation (or Crown Prosecution Service (CPS) or Crown Office and Procurator Fiscal Service (COPFS) prosecution) may give weight to a claim of trafficking or modern slavery offences, potential victims are not obliged to cooperate with the police at any stage in the National Referral Mechanism (NRM) process. When considering the case you must not penalise a potential victim who is unwilling to cooperate with the police.

Reasonable Grounds Outcome

The SSL must complete a 'consideration minute' setting out the rationale for Reasonable Grounds decision they have reached, and the evidence supporting that decision, whether the decision was positive or negative. There are 3 different reasonable grounds decision sheets: positive (for trafficking or other forms of slavery), negative due to credibility issues, negative as the situation does not meet the definition of modern slavery.

The consideration minute must include:

- clear credibility findings including reference to which events the SSL accepts took place and which events the SSL does not accept took place;
- what evidence was considered when making the decision;
- why the definition of human trafficking or slavery, servitude or forced/compulsory labour is or is not met in respect of a Reasonable Grounds test
- what the final decision was;
- date of decision

The consideration minute may also include the following evidence where available to the SSL and relevant to the case:

- immigration history
- objective information on the country in question

Where the assessment of credibility undermines an individual's account to the point that the Reasonable Grounds standard of proof can no longer be met the SSL must conclude that the subject is not a victim of modern slavery.

The SSL should deliver the decision and the reasons for it to the frontline worker and potential victim verbally at the point the decision is made (or deliver this through the frontline worker / by telephone if they are not in the same location). The SSL should not share the consideration minute directly with the victim. The SSL should explain that written confirmation of their decision will be sent to the victim by CMU in due course.

SSLs should be aware that their decisions are open to Judicial Review (JR). This is a type of court proceeding in which a judge will consider the way in which the decision has been made, in order to determine the lawfulness of the decision. As part of this process the consideration minute will be an important piece of evidence, so it is important that SSLs set out how they made their decision as clearly and fully as possible.

If the potential victim is present when the NRM form is being completed and the decision is being made, the SSL should explain the decision to the potential victim on the spot, but explain that CMU will provide written confirmation in due course. If the potential victim is not present, the SSL should simply send the NRM form and consideration minute to CMU. CMU will then write to the victim to notify them of the decision.

If the SSL makes a positive decision and the adult victim requests support, the SSL should contact The Salvation Army to arrange for the potential victim to be supported. If the SSL makes a negative decision, the individual is not entitled to Government-funded adult victim support (in some cases they will still have access to accommodation where they are seeking asylum).

The Salvation Army (TSA) should be contacted on their 24-hour confidential referral helpline on 0300 3038151. As well as the phone referral, the SSL should send the NRM form to TSA together with a confirmation of their decision. If it is not possible to do this at the exact time of the decision, the relevant documents can be sent to TSA within 24 hours of referral. The SSL can work with TSA to make arrangements for how TSA will actually reach the potential victim. The Salvation Army will have a list of SSLs so that they can verify the identity of the caller.

Suspended Cases

If a frontline worker provides an SSL with a completed NRM form but reports that victim has gone missing, the SSL should still make a decision if there is sufficient information available and send that decision to CMU. If the decision is positive, they should notify CMU that the victim is missing, and ask them to suspend the case and not forward it for a Conclusive Grounds decision. CMU will then re-open the case if the same individual is referred in by a different SSL or if the same SSL notifies them that the victim has been found.

If there is not sufficient information to make a Reasonable Grounds decision, and the victim is not available to ask for more information, then the NRM form should still be sent to the CMU but marked as 'suspended'. If the victim is subsequently found or more information comes to light, the SSL should update the NRM form, make a decision, and submit it to the CMU as normal.

If some of the indicators of modern slavery are present, but are insufficient to reach the necessary standard of proof to make a Reasonable Grounds decision, of a positive decision has been made but the victim is missing, the SSL should report the potential victim of modern slavery as a vulnerable missing person to the police. They should also notify the frontline worker that referred the case, and The Salvation Army, that the case has been suspended because the potential victim is missing.

In the case of a potential child victim, the Local Authority should immediately be contacted to notify them of a missing child.

Appeals against a Reasonable Grounds decision

The only means of challenging a National Referral Mechanism (NRM) decision is by way of Judicial Review (JR).

In the event that an SSL's decision is challenged, SSLs should follow their organisation's existing procedures for handling litigation. The Home Office owns the UK's NRM policy so the SSL should notify the CMU of any Judicial Reviews or Pre-Action Protocols and add the Home Office as an interested party in proceedings.

Reconsideration of a Reasonable Grounds decision

If an SSL or support provider wishes to submit additional evidence, or they raise specific concerns that the decision is not in line with published guidance, the SSL must look at whether they wish to reconsider the decision. This is not a formal right of appeal and the decision should only be reconsidered where there are grounds to do so and the SSL thinks that new evidence is significant enough to merit reconsideration. New information should be provided to the CMU who will coordinate all correspondence on NRM pilot cases, who will then contact the relevant SSL.

If significant new information is received by the SSL they should make another decision based on the new information (which may lead to the same outcome) and then notify the CMU of the new decision and additional evidence by completing another consideration minute. CMU will then add this to the existing case file for this case. If CMU receive the new information, they will send it to the SSL who made the original decision, to make another decision.

Indicators of Modern Slavery

Physical and sexual health indicators of modern slavery or trafficking

Physical indicators of modern slavery may include:

- injuries apparently as a result of assault or controlling measures
- neurological symptoms, headaches, dizzy spells, memory loss
- gastrointestinal symptoms (symptoms relating to the stomach or intestines)
- cardiovascular symptoms (symptoms relating to the heart)
- musculoskeletal symptoms (symptoms relating to the bones or muscles)
- tattoos or other marks indicating ownership by exploiters
- work related injuries often through inadequate personal protective equipment or poor health and safety measures.

Sexual health indicators

Sexual health signs of modern slavery may include:

- pregnancy as a result of their modern slavery situation, they may have recently been forced to terminate a pregnancy
- sexually transmitted diseases
- injuries of a sexual nature
- gynaecological symptoms such as urinary or vaginal infections, pelvic inflammation or pain or irregular bleeding.

Psychological indicators of modern slavery

Psychological indicators of modern slavery may include:

- expression of fear or anxiety
- depression (lack of interest in engaging in activities, lack of interest in engaging with other individuals, hopelessness)
- isolation
- suffering from post-traumatic stress and/or a range of other trauma induced mental or physical illnesses, symptoms of post-traumatic stress may include:
 - hostility
 - aggression
 - difficulty in recalling details or entire episodes, and
 - difficulty concentrating
- drug use
- alcohol use
- self harm
- suicidal feelings
- an attitude of self-blame, shame and an extensive loss of control.

Situational and environmental indicators of modern slavery

The International Labour Organisation (ILO) has produced a report listing specific signs of forced labour and sexual exploitation. These are categorised into strong, medium and weak signs, broken down for adult and child cases. Indicators include:

- distrust of authorities
- acting as if instructed by another
- lack of knowledge about the area they live in the UK
- fear of saying what their immigration status is
- fearful and emotional about their family or dependents
- limited English, for example only having vocabulary relating to their exploitative situation
- passport or travel document has been confiscated
- someone has taken advantage of their illegal status in the UK.

See link below to report on ILO operational indicators of human trafficking.

[http://www.ilo.org/global/topics/forced-labour/publications/WCMS_105023/lang--en/index.htm](http://www.ilo.org/global/topics/forced-labour/publications/WCMS_105023/lang-en/index.htm)

Indicators of forced labour and domestic servitude

The following indicators are particularly relevant to those victims of modern slavery or trafficking exploited as domestic workers or for forced labour, withholding:

- passports
- payments
- information about rights as workers in the UK
- information about a person's rights as visitors in the UK.