

SLAVERY IS CLOSER THAN YOU THINK



Modern Slavery and Human Trafficking Toolkit

The purpose of this Modern Slavery Toolkit

Plymouth City Council has adopted a public health approach to modern slavery. This involves a comprehensive and multidisciplinary approach to prevent, detect, respond to, and support individuals affected by this crime. It recognises that modern slavery is not just a legal or criminal justice issue, but a public health concern that requires action across multiple sectors, including law enforcement, fire and rescue, health, social services, education, and community engagement.

A community-centred approach to modern slavery involves localising our approach to directly address the needs of communities in Plymouth. It recognises the importance of mobilising assets within our communities to encourage equity amongst our residents and empower individuals to contribute to the fight against modern slavery. Community-centred approaches focus on co-design with those with lived experience of modern slavery, reducing barriers to accessing services, and building social capital.

A person-centred approach to modern slavery places the needs and experiences of those subjected to modern slavery at the heart of its response. It places emphasis on the impact of trauma on survivors, dispels the concept of the 'perfect victim', advocates for survivors to be in control of their recovery plan, and encourages professionals to communicate effectively to build trust with the survivors they support.

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This Modern Slavery Toolkit has been developed to equip all partner organisations, and First Responders across Plymouth to recognise modern slavery and/or human trafficking, and report concerns about a child, young person, or adult at risk, who is at risk of, or is being exploited or trafficked, and to respond appropriately.

Under the Modern Slavery Act 2015 [First Responders](#) have a statutory responsibility and legal obligation to refer potential victims of modern slavery into the National Referral Mechanism (NRM). This will assist the person's access to support, such as recovery and reflection period of at least 35 days, safe accommodation, assistance and advice.

First Responders are responsible for

- Identifying victims, recognise indicators, and respond
- Ensure survivors are Safeguarded, and not subject to re-trafficking at point of identification
- Gather information to inform the NRM referral and decision-making process.
- Making a referral into the NRM or completion of an anonymous Duty to Notify (DtN) report.
- Provide a point of contact for the Home Office for the decision / reconsideration request.

Details of how to raise a concern are covered in [Chapter 10](#) of this document.

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I. Modern Slavery

What is Modern Slavery and Human Trafficking?

Modern Slavery and Human Trafficking are crimes in which children, young people and adults at risk are treated as commodities and exploited for criminal gain. It is a global issue which transcends age, gender, ethnicity, and borders. People at risk of modern slavery or exploitation may have been brought legally or illegally from overseas, or they may be British citizens living in the United Kingdom.

Data on Modern Slavery

Statistics from the National Referral Mechanism, (2025), highlighted the following.

- 6,414 potential victims of modern slavery were referred to the Home Office from July to September 2025, representing a 13% increase compared to the previous quarter (5,689) and a 35% increase from July to September 2024 (4,752).
- the number of referrals received this quarter is the highest number of referrals received in a single quarter since the NRM began in 2009
- 81% (5,165) were sent to the Single Competent Authority (SCA) for consideration and 19% (1,249) to the Immigration Enforcement Competent Authority (IECA)
- the most common nationalities referred this quarter were UK (20%; 1,312), Eritrean (16%; 1,044) and Somali (10%; 662).
- this was the highest number of referrals for UK, Eritrean and Somali nationals in a quarter since the NRM began.
- 112 disqualification requests were made this quarter, representing a 50% increase compared to the previous quarter (56).
- 6,470 reasonable grounds and 6,708 conclusive grounds decisions were issued this quarter; of these, 64% of reasonable grounds and 68% of conclusive grounds decisions were positive.
- the number of conclusive grounds decisions issued this quarter was the highest in a quarter since the NRM began.
- the number of cases awaiting a conclusive grounds decision continues to fall, with 9,107 cases awaiting a decision at the end of September 2025, a reduction of 21% from the previous quarter (11,645) and a reduction of 69% from the peak at the end of 2022 (29,275).
- the average age of cases awaiting a conclusive grounds decision at the end of June 2025 was 141 days, as compared to 304 days at the end of the previous quarter.
- the Home Office received 2,001 reports of adult potential victims via the DtN process, the highest in a single quarter since the DtN began.

The true extent of modern slavery in the United Kingdom and globally is unknown, but it's estimated there were over 50 million people living in modern slavery in 2021. With 1.8 in every 1000 living in modern Slavery in the UK. [World | The Global Slavery Index \(walkfree.org\)](#)

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Definitions

The Modern Slavery Act 2015 covers both the **holding** of a person in a position of slavery, servitude forced or compulsory labour **AND** Human Trafficking which involves **moving** a person for the purpose of exploitation (sexual exploitation, forced labour, forced criminality, organ donation, servitude or slavery).

Section 1 of the Modern Slavery Act 2015 states:

1(1) A person commits an offence if – The person **holds** another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is **held** in slavery or servitude

or

The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

Section 2 of the Modern Slavery Act 2015 states:

2(1) A person commits an offence if the person arranges or **facilitates the travel** of another person with a view of [the victim] being exploited. It is irrelevant whether [the victim] has consented to the travel; it is the intent that is relevant.

Slavery: The status or condition of a person over any or all the powers attaching to the rights of ownership is exercised (in essence treating a person as an item of “property” that you can do whatever you want with/to).

Servitude: An aggravated form of Forced or Compulsory Labour the fundamental distinguishing feature is in the victim feeling that their condition is permanent and unlikely to change.

Forced labour: Victims are forced to work against their will, often working very long hours for little or no pay in dire conditions, under verbal or physical threats of violence to them or their families.

Sexual exploitation: Victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution and pornography. Whilst women and children make up the majority of victims, men can also be sexually exploited.

Forced criminality: Victims are forced or coerced into committing crimes such as cannabis cultivation, pick pocketing, shoplifting and begging.

Organ donation: Victims may be recruited through deception, not being fully informed as to the nature of the procedure, the recovery and the impact of the organ removal on his or her health. Their consent may also be obtained through coercion or abuse of a position of vulnerability.

Debt bondage: Victims are forced to work to pay off debts that realistically they will never be able to pay off. Low wages and arbitrary deductions mean not only that

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they cannot ever hope to pay off the loan, but that the debt may increase or be passed down to their children.

The internationally accepted [definition](#) of Human Trafficking (Palermo Protocol) involves 3 component parts (for adults):

Human Trafficking		
The Act	The Means	The Purpose
Recruitment Transport Transfer Harbour Receipt	Fraud Deception The threat of/or the use of Force Abduction Coercion Abuse of a position of vulnerability Abuse of power	Sexual exploitation Forced labour Forced criminality Organ donation Servitude Slavery

The terms ‘human trafficking’ and ‘modern slavery’ are often used interchangeably. However, there is a distinction: the Modern Slavery Act differentiates human trafficking offences from offences of slavery, servitude and forced or compulsory labour. The government has described the difference as follows:

For a person to have been a victim of human trafficking there must have been;	For a person to have been a victim of slavery, servitude and forced or compulsory labour there must have been:
<p>Action (recruitment, transportation, transfer, harbouring or receipt, which can include either domestic or cross border movement) Means (threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability – however, there does not need to be a means used for children as they are not able to give informed consent) Purpose of exploitation (e.g. sexual exploitation, forced labour or domestic servitude, slavery, financial exploitation, illegal adoption, removal or organs).</p>	<p>Means (being held, either physically or through threat of penalty – e.g. threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability. However, there does not need to be a means used for children as they are not able to give informed consent) Service (an individual provides a service for benefit, e.g. begging, sexual services, manual labour, domestic service).</p>

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Child Criminal Exploitation, County Lines and Forced Criminality

Child Criminal Exploitation (CCE) is not yet defined in law, though the government's Serious Violence Strategy defines it as occurring where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity:

- in exchange for something the victim needs or wants
- for the financial or other advantage of the perpetrator or facilitator
- through violence or the threat of violence

County Lines is a common form of child criminal exploitation. Gangs and organised criminal networks are involved in exporting illegal drugs around the UK (often from urban to rural areas, although this can happen within the same county) using dedicated mobile phone lines or other forms of a 'deal line' and they exploit children and vulnerable adults to move and store drugs and money. They will often use coercion, intimidation, violence (including sexual violence) and weapons. Children can also be criminally exploited in other ways, such as theft, acquisitive crime, knife crimes and other forms of criminality and exploitation.

(Home Office Disruption Toolkit [Child exploitation disruption toolkit \(publishing.service.gov.uk\)](https://publishing.service.gov.uk))

Forced Criminality

County Lines and Child Criminal Exploitation are not expressly mentioned in the definition of Modern Slavery and Human Trafficking; they fall within the scope of "Forced Criminality". The [definition](#) of "Forced Criminality" is taken from the International Labour Organisation, which is centred upon the "involuntary" nature of the act coupled with a "threat of penalty".

This can be a little confusing when it comes to County Lines and CCE as it implies that a child needs to be forced, threatened, or coerced into committing a crime before they can be considered to be a victim. This is NOT the case as, legally, a child CANNOT consent to their own exploitation. When it comes to determining whether a child has been exploited, the following must be determined.

Have they been recruited, transported, transferred, harboured or received (**The ACT**)

AND

Have they been criminally exploited i.e. has the child committed the crime for the benefit of another (**The PURPOSE**)?

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Human Trafficking (for those under 18)		
The Act	The Means	The Purpose
Recruitment Transport Transfer Harbour Receipt	A child cannot consent to their own exploitation; therefore, the Means does not need to be established.	Sexual exploitation Forced labour Forced criminality Organ donation Servitude Slavery Kidnap for Ransom

Child Sexual Exploitation

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Children can never consent to sexual activity. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology.

(Home Office Disruption Toolkit) [Child exploitation disruption toolkit \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/421207/Child_exploitation_disruption_toolkit.pdf)

It is important to remember the clear link between Child Sexual Exploitation and Modern Slavery. The Modern Slavery Act 2015 provides effective legislation to tackle CSE, and potential victims should be referred to the National Referral Mechanism. Again, it is important to note that a child cannot consent to their own exploitation and therefore the Act and the Purpose need only be ascertained (see diagram above).

2. Risk factors, warning signs and locations of concern

Risk factors of modern slavery

Anyone, regardless of age, gender, ethnicity and sexuality, can be at risk of modern slavery. However, traffickers or modern slavery facilitators often target people at risk of exploitation as they are easier to manipulate and coerce.

Vulnerable groups may include.

- People with lower incomes and people experiencing poverty.
- People experiencing loneliness and/or social isolation.
- People experiencing homelessness or experiencing housing insecurity
- People who may be missing or may frequently go missing.
- People experiencing harms associated with substance misuse or/ people dependent on alcohol or drugs.
- People with poor or no access to education.
- Care-experienced Young People.
- People experiencing mental ill health, physical ill health, learning difficulties or neurodiversity, or physical disability.
- People experiencing domestic abuse.
- People who have insecure migration status or are seeking asylum.
- People who may have previously been a victim of Modern Slavery or Human Trafficking.
- Young people who are at risk of or experiencing exploitation.
- Sex workers.
- Women and girls often go unseen and may experience multiple vulnerabilities, trauma, and unmet needs, and often face violence, intimidation, sexual abuse, and criminal and/or sexual exploitation. They are often recruited as they are believed to be less likely to attract the attention of police and they can be made to fulfil several roles in the group, from administrator and organiser to girlfriend or sexual partner. Exploitation can be overlooked as they may not fit into society's idea of what a "victim" should be.
- Unaccompanied asylum-seeking children and young people.
- People who have witnessed/experienced domestic abuse.
- People who have experienced child abuse/child neglect historically.

Modern slavery warning signs

Taken from Modern Slavery: Statutory guidance [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\)](#) and [non-statutory guidance for Scotland and Northern Ireland \(accessible version\) – GOV.UK \(www.gov.uk\)](#)

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To identify a potential victim of modern slavery, frontline practitioners who might encounter a potential victim should be familiar with the indicators. In practice it is not easy to identify a potential victim – there are many different physical and psychological elements to be considered as detailed below.

In determining whether a person has been subjected to slavery, servitude or forced or compulsory labour, regard may be had to all the circumstances including any of the person's personal circumstances, such as the person's age, the person's family relationships, and any physical or mental disability or illness, that significantly impair the person's ability to protect themselves from being subjected to slavery, servitude or forced or compulsory labour.

It is important to remain observant of signs of physical injuries, health conditions and psychological trauma. However, it should also be noted that physical injuries, psychological problems and illnesses may not be visible in many cases and may not be easily disclosed by victims. For those who have been both physically and psychologically abused over prolonged periods, the physical and psychological complaints are deeply entwined.

The indicators below are relevant to both child and adult victims of modern slavery.

General indicators of modern slavery

A person with lived experience may

- believe that they must work against their will
- be unable to leave their work environment or home environment
- show signs that their movements are being controlled (e.g., always accompanied by a minder, or are being closely monitored through devices/technology)
- feel that they cannot leave
- show fear or anxiety
- be subjected to violence or threats of violence against themselves or their family members and loved ones
- suffer injuries that appear to be the result of an assault (including sexual assault)
- suffer injuries or impairments typical of certain jobs or control measures
- suffer injuries that appear to be the result of the application of control measures
- be distrustful of the authorities
- be threatened with being handed over to the authorities
- be afraid of revealing their immigration status
- not have their passports or other travel or identity documents, as those documents are being held by someone else
- come from a place known to be a source of human trafficking
- have had the fees for their transport to the country of destination paid for by facilitators, whom they must pay back by working or providing services in the destination
- have a false identity or travel documents (or no documentation)

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- be found in or connected to a type of location likely to be used for exploiting people
- be unfamiliar with the local language
- do not know their home or work address
- allow others to speak for them when addressed directly
- act as if they were instructed by someone else
- be forced, threatened or deceived into working in poor conditions
- be disciplined through punishment
- be unable to negotiate working conditions
- receive little or no payment
- have no access to their earnings or bank account
- work excessively long hours over long periods
- do not have any days off
- live in poor or substandard accommodations
- have no access to medical care
- have limited or no social interaction
- have limited contact with their families or with people outside of their immediate environment
- be unable to communicate freely with others
- be under the perception that they are bonded by debt
- be in a situation of dependence
- have acted on the basis of false promises

Physical Indicators

- physical injuries – these may have unclear explanations as to how or when they were sustained, they may be untreated, or partially treated, or there may be multiple or unusual scars or healed fractures, or injuries of a sexual nature i.e., indicative of frequent forced sexual intercourse.
- work-related injuries – often through inadequate personal protective equipment or poor health and safety
- physical consequences of captivity, neglect, poor environmental conditions – for example, infections including tuberculosis, chest infections or skin infections, malnutrition and vitamin deficiencies or anaemia
- neurological symptoms – for example, headaches, dizzy spells, poor memory, poor concentration, problems with cognition, post-traumatic epilepsy
- dental problems – from physical abuse and/or neglect of dental hygiene
- deterioration of pre-existing chronic medical conditions – these may be untreated (or poorly treated) chronic conditions such as diabetes, hypertension or cancers
- cardiovascular or respiratory symptoms – often chest pain, palpitations, breathlessness (may be due to anxiety, but poor health in victims means that such symptoms need exploring)
- gastrointestinal symptoms – abdominal pain or health conditions related to swallowed, internally placed or ruptured packets of illegal substances
- non-specific symptoms – fatigue, weight loss, fainting
- chronic pain – this can be from specific injuries or may be more generalised – “all over body pain”. Exacerbated by lack of sleep and stress. Maybe psychosomatic

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- medically unexplained symptoms – symptoms without an identifiable physical cause are common, and can be non-specific such as headaches, dizziness or back pain, or may be related to trauma to a particular part of the body, for example, abdominal pain in rape victims
- disfigurements – cutting, burning, or branding may be used as a means of punishment or to indicate ownership by exploiters. Victims are sometimes forced to undergo cosmetic procedures, for example, breast implantation, and use of skin-lightening creams. Disfigurement can also be the result of self-harm and attempted suicide
- post-operative pain – infection or scarring from organ harvesting, particularly of a kidney

Psychological Indicators

Trauma can manifest in many ways, and this could be as a mental health problem, for example, anxiety, low mood or suicidal thinking. Victims may also have diagnosable psychiatric disorders such as post-traumatic stress disorder (PTSD), complex PTSD, depressive disorders, anxiety disorders and adjustment reactions. Symptoms may be worsened by exacerbating factors, such as significant sleep deprivation and malnutrition. 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 or alienation
- attachment and identity issues – can create detachment from others or an over-dependence (or both). This can include a dependency on exploiters
- an inability to regulate emotions – for example, a persistent shifting between sadness, forgiveness, anger, aggression, frustration and/or emotional detachment or emotional withdrawal
- difficulties with relationships – difficulties with trusting others (either lack of trust or too trusting) causing difficulties in relationships and difficulties assessing/addressing risks or warning signs in relationships
- loss of autonomy – for example, difficulty in making simple decisions, tendency to acquiesce to the views/desires of others
- memory difficulties – either problems with concentration/attention or poor memory for past events e.g., gaps or confusion about events
- dissociative episodes and re-experiencing phenomena such as flashbacks
- other indicators may include:
 - hostility
 - aggression
 - difficulty concentrating
 - self-harm
 - suicidal ideation
 - an attitude of guilt, self-blame, shame or low self-esteem
 - psychosis or the presence of hallucinations and delusions
 - substance misuse and addictions

Situational or Environmental indicators

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It is important to also know about the situational and environmental signs that can indicate a person is being exploited and is a victim of Modern Slavery.

- withheld passports or identity documents, contracts, payslips, bank information, health records.
- lack of information about rights as workers in the UK as well as support and advice services.
- lack of information about a person's rights as a visitor in the UK or a lack of knowledge about the area they live in the UK.
- acting as if coerced or controlled by another.
- going missing for periods.
- fearful and emotional about their family or dependents.
- limited English, for example only having vocabulary relating to their exploitative situation.
- restriction of movement (noting that victims are not often 'locked- up' but movement can be restricted) or being held in isolation.
- withholding wages (including deductions from wages).
- debt bondage.
- abusive working and/or living conditions.
- excessive overtime.

Child-specific indicators

Children may be victims of child sexual exploitation, and/or child criminal exploitation including county lines. There are several indicators associated with these forms of exploitation and all those working with children need to be aware of them. Children may display any of the indicators above. In addition, the following child-specific indicators should be considered:

- have no access to their parents or guardians (although children may be living with their parents or guardians and still be exploited).
- look intimidated.
- behave in a way that does not correspond with behaviour typical of children their age, especially sexualised behaviours.
- have friendships/relationships with older peers or adults.
- frequently missing or late to education if they are accessing education.
- have no time for playing or cannot play.
- live apart from other children and in substandard accommodation.
- eat apart from other members of the "family".
- be given only leftovers to eat.
- be engaged in work that is not suitable for children.
- travel unaccompanied by adults.
- travel in groups with persons who are not relatives.
- make frequent requests for condoms and/or emergency contraception.
- have possession of more than one phone.
- have unexplained gifts or new possessions.
- may be carrying large amounts of cash.
- may have hotel goods e.g. key cards, branded toiletries etc.

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- may have travel documents e.g. train, and bus tickets, for areas that they have no apparent connection to.

The following might also indicate that children have been trafficked:

- the presence of child-sized clothing typically worn for doing manual work or forced prostitution.
- the presence of toys, beds and children's clothing in inappropriate places such as brothels and factories.
- the claim made by an adult that he or she has "found" an unaccompanied child.
- the finding of unaccompanied children carrying telephone numbers for calling taxis.
- the discovery of cases involving illegal adoption.

Locations of concern regarding modern slavery

Modern slavery operates in a variety of public and private locations however, low-paid, poorly regulated, labour-intensive industries are particularly susceptible. These industries may include construction, food packaging and processing, agriculture and fisheries, restaurants and takeaways, hand car washes, nail bars, and care homes.

Brothels and Adult Service Websites (ASWs) may also be used to facilitate sexual exploitation (it must be noted that the internet has allowed many sex workers to work independently and in a safer environment, and that only a minority of sex workers are victims of Modern Slavery). Many brothels operate out of short-term or holiday lettings and hotel rooms. These are often referred to as "pop-up brothels" (a brothel requires 2 or more persons working from the same premise, even if they're not working at the same time). The victims work out of these locations for just a few days, generating custom via adverts placed on Adult Services Websites before moving on to a new location, often in a different town.

Whilst particular industries e.g. hand car washes and nail bars are frequently discussed in the context of Modern Slavery, it is important that we understand our own communities and recognise that Modern Slavery may manifest itself in a very localised manner.

Modern Slavery, Trafficking, County Lines, criminal exploitation and serious violence is not only limited to the most deprived parts of inner-city Britain but can stretch to small rural villages. Rural market towns could also be lucrative import areas for County Lines, as these are seen as relatively low risk for perpetrators of exploitation compared to more traditional urban export cities. It is also important to recognise that it is not always gangs from large urban cities that may target young people; local crime groups, using the same recruitment strategies as their larger counterparts, may also target and exploit local people.

Criminal, labour, sexual, domestic servitude are the primary forms of modern slavery in the UK.

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In Devon & Cornwall, and across the UK, NRM referrals increased sharply in 2023–24, particularly for:

- Child exploitation (44–58% of referrals),
- Labour/criminal exploitation (mostly male adults),
- Sexual exploitation (mostly female adults and minors).

Plymouth's Modern Slavery Update (Aug 2024) outlines areas of high vulnerability including port-related industries and the care sector. The Progress Report (Aug 2025) highlights actual cases involving car washes, pop-up brothels, fast-food outlets, shoplifting and drug-related exploitation, along with the need for increased vigilance in care homes and social services.

Operation Makesafe (Sep 2024), a Police campaign and 2025 ITV coverage focused on child exploitation: grooming, forced criminality, drug-related exploitation, targeted by plain-clothes inspections in hotels and taxi checks identified hotel-based child exploitation.

Being a naval and commercial port city, Plymouth sees high risk of cross-border trafficking via seaports and the use of hidden brothels and exploitative labour schemes near transport hubs. Its vulnerable population includes children, migrants, those facing homelessness or economic precarity.

Please note: Policing and referral statistics rely on detected and reported cases. Underreporting—especially of sexual exploitation and labour abuse—is still a major concern.

3. Barriers to victim cooperation

The barriers to victim cooperation and disclosure are significant and should **not** be underestimated. Building trust and developing a rapport with the potential victim is often key, but this can take days, weeks, months and even years to achieve! In many cases, victims of Modern Slavery do not consider themselves to be victims, particularly if they come from a low-income background.

It is also important to remember that psychological and emotional abuse/coercion can be very difficult to evidence and outwardly, victims may appear to be making free and independent choices, yet this psychological and emotional abuse/coercion can be just as effective as physical and visible controlling mechanisms.

Barriers to disclosure/co-operation

- the fear of being beaten, raped or even killed at the hands of their traffickers if they were to ask for help.
- believing that UK law enforcement is corrupt, ineffective or disinterested in their circumstances.
- where the victim is an illegal immigrant, believing that UK law enforcement will pursue.
- legal migration status.
- their deportation rather than prioritising the investigation into the abuse and exploitation they've been subjected to.
- reprisals against family members or from an employer.
- discrimination from their community, families and religious groups (e.g., being viewed as a prostitute rather than a victim of multiple rapes).
- the fear of stigma or shame.
- situational dependency and a lack of awareness of the help and support available.
- victims may feel responsible for their situation/may have consented to elements of their exploitation i.e., knowing that they were to be a sex worker but NOT knowing the conditions they'd be subject to.
- cultural differences i.e., children may see themselves as "young adults" with a responsibility to help provide for their family.
- fear of juju or [witchcraft](#) ceremonies.
- Stockholm syndrome - a coping mechanism for a captive or abusive situation where there is emotional identification with the perpetrator.
- belief that their current situation is only temporary and a stepping stone to a better future.
- people experiencing trauma.

Many Modern Slavery victims have been subject to unimaginable abuse and exploitation. The trauma that they've been subjected to may make it difficult for a victim to accurately recall events. There may be inconsistencies and contradictions in the accounts that they give, and they may be hostile and aggressive towards the police and those who are trying to help them.

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Methods to build trust

A consistent, trauma-informed and survivor centred approach across partners is required to support the recovery and empowerment of survivors and build trust. All staff need to understand the importance of trust, and organisations should embed consistent practices that promote safety, dignity, and empowerment. This will improve survivor outcomes through coordinated, respectful and ethical service delivery.

This can be achieved through the following guiding principles:

- Trauma informed care to avoid re-traumatisation.
- Survivor centred care to prioritise the needs, rights and voice of the survivor.
- Cultural competence regarding cultural, linguistic and individual differences.
- Transparency and accountability about roles, responsibilities and limitations.
- Collaboration across agencies to provide holistic support.

Staff Training and Development

- Mandatory training on trauma-informed care, modern slavery indicators, and cultural sensitivity.
- Ongoing reflective practice and supervision to support staff wellbeing and effectiveness.

Survivor Engagement and Communication

- Use clear, jargon-free language.
- Provide access to trained interpreters and culturally appropriate communication tools.
- Ensure survivors are informed about their rights, options, and the role of each agency.

Confidentiality and Consent

- Develop clear protocols for information sharing, with survivor consent at the core.
- Explain data use and storage in accessible formats and languages.

Service Delivery Standards

- Ensure services are accessible, inclusive, and responsive to individual needs.
- Provide consistent points of contact to reduce re-traumatisation.
- Offer long-term support pathways (e.g., housing, legal aid, mental health, employment).

Multi-Agency Coordination

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- Establish a shared case management system or lead professional model.
- Regular multi-agency meetings to review cases and ensure continuity of care.
- Joint protocols for safeguarding, referral, and crisis response.

Monitoring and Evaluation

- Collect feedback from survivors to assess trust and satisfaction.
- Monitor outcomes related to engagement, wellbeing, and service uptake.
- Review and update the policy annually in consultation with survivor advisory groups.

4. Key Investigative Considerations

Safety and Support

- Call 999 if a crime is occurring.
- Utilise the Pathway (Annex 2) to ensure provision of immediate support and referral to most suitable agency.
- Address any immediate health concerns, keeping in mind forensic opportunities and the possibility of any sexual offences being disclosed.
- Remove victims from the place of exploitation and away from potential perpetrators.
- Contact the [Salvation Army](#) (Modern Slavery Victim Care Contract) and police (101) to support with immediate Safeguarding and arrange attendance of a Police Modern Slavery Victim Liaison Officer via 101.
- Where an individual requires MSVCC support via The Salvation Army to prevent destitution, depending on their individual circumstances, they will either be provided accommodation, and financial support to meet their essential living needs; or financial support to meet their essential living needs (where they do not require accommodation).
- The Salvation Army (MSVCC) and Devon and Cornwall Police will work together to provide suitable alternative clothing and toiletries (Do not use forensic suits/prisoner clothing) and provide substantial meals and refreshments (seek advice if malnutrition is suspected).
- Separate but do not isolate potential victims from one another. Ensure that they are moved to a trauma-informed, accessible space.
- Dispel any fears or anxieties. Victims may be in fear of the Police and other authorities due to corruption and bad practices in their Country of origin.
- Explain the NRM process thoroughly and seek victims' consent for referral Adults (over 18) need to consent to the NRM process. If they don't then a duty to notify form can be completed. Children do not have to consent.
- Take necessary measures to prevent the victim from going missing or being re-trafficked by arranging safe and supervised accommodation if required.

Age Assessments

In some cases, it may be unclear whether the victim is younger than 18. Aside from the physical, sexual or emotional abuse they may have suffered, many trafficked children and young people have been forced by their traffickers to tell a false story if they are questioned. All these factors may impact the victim's ability to participate fully and openly in an age assessment.

- Age assessments should only be carried out where there is a significant reason to doubt that the claimant is a child, as the repeated questioning of the child or young person's credibility and identity can leave them feeling angry and bewildered and affect the way they engage with social workers and other professionals.
- Where there is uncertainty about age, a suspected victim must be presumed to be a child and be afforded special protection measures pending assessment of their age

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- Care must be given to planning accommodation for potential victims who may be at risk of going missing very soon after discovery. For example, bed and breakfast accommodation is not suitable for any child, even on an emergency basis.
- The venue for age assessment interviews needs to be conducive to helping the child or young person feel safe and comfortable. Police Stations are not considered appropriate for conducting age assessments.
- Age assessments are the responsibility of Children's Social Care; they are **NOT** conducted by the police. Access this via the Multi-Agency Safeguarding Hub 01752 668000 or familiesfirst@plymouth.gov.uk

Remember that there is a duty of care towards any potential victim of modern slavery regardless of whether they have identified themselves as such, or whether they have consented to enter the NRM.

5. Information for Police

Translation and Interviews

- Provide victims with access to an accredited interpreter
- Consider the gender of the interpreter and any cultural issues or sensitivities
- Do not use potential victims as interpreters as they could themselves be exploited, or exploited by others, even if they are being forced to.

Suspects

- Consider that suspects could also be victims of modern slavery and be subject to threats and coercion themselves
- Remember, exploitation includes forced criminality. For example, begging, shop theft and cannabis cultivation. Therefore, suspects who indicate that they have been exploited to commit such criminality will have a statutory defence under the S45 Modern Slavery Act 2015.
- If a suspect raises a statutory defence under S45 Modern Slavery Act 2015 you should seek a disposal decision from CPS. You should not charge a suspect and simultaneously submit an NRM referral as this could lead to the punishment of a victim.
- Assess the risk to the victim (s) and implement suitable control measures if a suspect is released on bail. For example, bail conditions and civil orders.

Crime Scenes

- Treat victims, the locations where the exploitation occurred (including vehicles used to transport) and suspects as crime scenes. S12 MSA provides a Constable with the power to seize/detain any vehicle, boat or plane.
- Commence a scene log
- Consult with a Crime Scene Manager at the earliest opportunity

Evidential Items

- Identity Documents: Passports, Driving Licences, and National Insurance Cards may provide evidence of forgery, identity theft and fraud.
- Travel Documents: Flight and train tickets, baggage tags, travel labels, hotel bookings, taxi and petrol receipts may identify routes or points of entry. They may also help evidence the “act” of trafficking, including transportation or transfer of individuals.
- Telecommunications: Contact lists, SIM cards, SMS, browsing history, navigation app data, photos, and files may all provide intelligence in relation to the wider organised crime networks and the scale of criminality involved.
- Financial Documents: Credit Cards, Bank Statements, pay slips, loan agreements, benefit statements and tax credit receipts may identify opportunities for CCTV as well as identifying the flow of money and hierarchical arrangements of the organised crime group.

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- Employment Documents: Duty sheets, pay slips, address books, diaries, contracts, and recruitment agency papers may evidence working arrangements, locations, facilities, etc.

Spontaneous investigations should be overseen by the Duty Detective Inspector in the first instance.

6. Clandestine entry, people smuggling and illegal migrants

There is a clear distinction between people smuggling and human trafficking.

- People smuggling is a voluntary process which occurs when an individual seeks the help of a facilitator to enter the U.K. illegally (or cross any other international border) and the relationship between both parties ends once that objective is met.
- Human trafficking involves the ongoing exploitation of an individual. It can occur across international boundaries or internally within countries. As per the definition above, it requires an element of force, coercion, deception etc.

Despite this clear distinction, smuggled people are vulnerable people and during their journey, it's not unusual for a smuggled person to enter, or be forced to enter into an exploitative relationship and therefore become trafficked.

Unaccompanied Migrant Children

Unaccompanied migrant children who arrive in the United Kingdom do so voluntarily, either to flee persecution and seek asylum or to pursue a better standard of living/be reunited with family members. They or their family often pay 'agents' to help them get into the United Kingdom (people smuggling). Some children however will arrive in the United Kingdom having been forced, threatened or deceived into doing so, with the intention that they will be exploited by someone, somewhere for something (human trafficking). Some may even have incurred a debt for the cost of their travel into the United Kingdom which needs to be repaid.

Regardless as to whether an unaccompanied migrant child has been smuggled or trafficked into the United Kingdom, he/she is at potential risk of significant harm. To identify and manage this risk as far as possible, Police Officers should follow the **"Operation Innerste"** Process Guidance whenever an unaccompanied migrant child is encountered.

Click on this link here: <https://www.gov.uk/government/publications/operation-innerste-process-caseworker-guidance>

Police: For further information please refer to the Operation Innerste guide on the Modern Slavery & Organised Immigration Crime share point sites

Treatment of illegal migrants as victims

Following concerns that on occasions, individuals with no leave to remain in the U.K. had reported being the victims of serious criminality BUT were detained for immigration offences instead, the National Police Chiefs Council published the following recommendations (Oct 2018):

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1. Fundamentally, an undocumented migrant (person without leave to remain) reporting a crime to the police should be **treated first and foremost as a victim of a crime.**
2. A Police National Computer PNC check should NOT be conducted for the **sole** purpose of determining a victim's immigration status, BUT it is accepted that PNC/PND (police national database/NICHE and other intelligence enquiries can be conducted to help inform risk assessments and identify investigative opportunities.
3. During an investigation, it is wholly appropriate to share information with Home Office Immigration Enforcement BUT the police will take NO enforcement action in respect of any immigration offences committed whilst their investigation is ongoing.

Once the police investigation has concluded, it **may** be appropriate to pursue the immigration offences committed. Much will depend on individual circumstances, and there may be a fine balancing act to perform. On the one hand, being the victim of a crime is not an automatic "barrier" to deportation/removal but on the other hand, some offenders prey upon the vulnerability of an individual's illegal status and by ultimately arresting and detaining a victim (even after an investigation has been fully completed) we are potentially playing into the hands of the perpetrators who exploit their victim's fears of being deported to not disclose the abuse that they have suffered.

7. The National Referral Mechanism

The National Referral Mechanism (NRM) & the Duty to Notify (DtN) – For adults

The National Referral Mechanism (NRM) is the national framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support. Any agency or organisation that suspects an adult may be a victim/at risk of modern slavery/human trafficking has a duty to report their concerns. You can do this by contacting the Modern Slavery Helpline on 0800 0121 700 or by clicking on the link to report it online:

<https://www.modernslaveryhelpline.org/report>

First responders

First responders can use the National Referral Mechanism (NRM) to:

- report cases of modern slavery
- refer potential victims for support and protection

First responders work for [designated organisations](#) and help identify and support potential victims of modern slavery. Please refer to the National Referral Mechanism Guidance: adult (England and Wales for first responder organisations, link here: <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales#Section-4>

Verbal consent is required for an adult to be referred to the NRM (signature no longer required). For an adult to provide their informed consent, you must explain:

- What the NRM is
- What support is available
- What the possible outcomes are for an individual being referred

You should also make it clear that information may be shared or sought by the Single Competent Authority ([SCA](#)) including from other public authorities to help them determine whether the individual is a victim of Modern Slavery.

If the potential victim is under 18, or may be under 18, an NRM referral **must** be made. Child victims do **not** have to provide their consent and indeed in many cases, might not even know that a referral has been made. If a child is approaching 18, it is useful to discuss future consent to remain in the NRM with them.

If an adult does not consent to entering the NRM but you still suspect that they're a potential victim of Modern Slavery, you must submit a Duty to Notify form instead. A Duty to Notify form should never be submitted in relation to a child.

The threshold for submitting an NRM referral is LOW. You do not need to believe that an individual is a victim, nor do you need any evidence, suspicion alone will suffice.

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The referral process

As of November 2019, both NRM and DtN referrals must be made online at:

<https://www.modernslavery.gov.uk/start>

Once completed, the NRM referral will be sent to the Single Competent Authority for assessment AND a link will be sent to the submitting officer to allow him/her to download a copy of the referral form. The referrer will also receive an email receipt which can be replied to if further information needs to be provided.

An NRM referral should clearly articulate the specific and detailed concerns held for the individual. It should also:

- contain enough information to allow decision-makers within the Home Office to make an informed decision.
- Include relevant information held by Partners

Whilst completing the NRM referral it is important to note that the potential victim does **NOT** have to accept support **NOR** do they have to co-operate with any police investigation.

The decision-making process

The NRM is a two-stage process:

I. Reasonable Grounds decision

Upon receipt of an NRM referral from any First Responder, the SCA have 5 working days to make a “Reasonable Grounds” decision. The threshold for this decision is:

“I suspect but cannot prove that the person is a victim of Human Trafficking, Slavery, Servitude and Forced or Compulsory Labour”

The more information that is provided at the point of referral, the easier and quicker this decision-making process can be.

A positive “Reasonable Grounds” decision is the gateway to specialist-tailored support for a minimum of 30 days (recovery and reflection period). This support may include:

- Legal advice
- Accommodation
- Counselling
- Protection

In England and Wales support to survivors of trafficking who have entered the NRM is provided under the [Modern](#) Slavery Victim Care Contract (MSVCC). MSVCC support is not a public fund and so support will be available to person regardless of

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their immigration status. The prime supplier of the MSVCC is currently The Salvation Army. This is coordinated by the [No Recourse to Public Funds](#) (NRPF) Network. They have responsibility for coordinating the safeguarding the welfare of destitute families, adults and care leavers who are unable to access benefits due to their immigration status.

The provision of emergency accommodation can be available to a person prior to receiving a reasonable grounds (RG) decision, if it is necessary to prevent [destitution](#) or the person is at risk of further exploitation. To access emergency support through the MSVCC, a person must meet the destitution test, meaning that they are without access to adequate accommodation and/or other essential living needs. If a person has access to public funds or has claimed asylum and can access accommodation from other sources, such as local authority homelessness assistance or Home Office asylum support, they will not qualify for MSVCC support. Where a person is being supported by social services under the Care Act 2014 or section 17 of the Children Act 1989 or the Social Services and Well-being (Wales) Act 2014, they would not usually be able to access emergency MSVCC support.

Currently the Salvation Army nationally are responsible for providing this support and will contact the Officer in Charge (OIC) who submitted the NRM referral if a positive decision is so that they can take over the care and support of the potential victim. The OIC / First Responder can contact The Salvation Army using the phone number [0800 808 3733](#).

2. Conclusive Grounds decision

During the 30-day “recovery and reflection” period, the SCA will try and gather as much information as possible to allow them to make a “Conclusive Grounds” decision. The threshold for this decision is:

“On the balance of probabilities, there is sufficient information to decide that the individual is a victim of modern slavery”

Whilst a positive “Conclusive Grounds” decision recognises the exploitation and abuse that an individual has been subjected to, it does not confer any automatic rights i.e., to remain in the U.K., right to receive compensation etc. It does however allow the individual to apply for discretionary leave to remain in the U.K. to allow him/her to:

- Assist the police investigation
- To seek compensation through the courts
- Access medical treatment that wouldn't ordinarily be available in their country of origin

Children and the NRM

As stated above, children do **NOT** need to consent before being referred to the NRM and as consent is **NOT** an issue, a DtN form should never be submitted.

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It is important to remember that a referral to the NRM does NOT replace or supersede established child protection processes which should continue in tandem (a child safeguarding referral should accompany any NRM referral). Under the 1989 and 2004 Children's Acts, Local Authorities have a statutory responsibility to safeguard and protect potential child victims irrespective of their immigration status. In terms of the NRM therefore, a child referral is very much about identifying and assessing whether a child is a victim of Modern Slavery rather than offering any subsequent support as this is the responsibility of Local Authorities.

Independent Child Trafficking Guardians (ICTG)

Independent Child Trafficking Guardians (ICTG) are an independent source of advice for children who have been trafficked and somebody who can speak up on their behalf. If the first responder considers a child to be a potential victim of modern slavery or human trafficking, they should refer them to the ICTG service. This is in addition to following usual safeguarding routes and NRM referrals. The NRM referral and ICTG referral should be made in parallel.

More information on the ICTG service in Plymouth can be found [here](#) or at the Barnardo's page [here](#).

8. Crime Recording

The Home Office Counting Rules for Recorded Crime (April 2019) stipulate that:

- All NRM and DtN referrals made by the police must be subject of a recorded crime of Modern Slavery unless it is determined that the Modern Slavery occurred outside England and Wales.
- All NRM referrals received by the police from the Single Competent Authority (SCA) (those that have been submitted by other first responders) must be subject of a recorded crime of Modern Slavery if a **positive** “Reasonable Grounds” decision has been reached.

Tactical options in dealing with modern slavery

Aside from arresting perpetrators for offences committed under the Modern Slavery Act 2015, numerous other options and tactics can be used to disrupt, deter and prosecute Modern Slavery perpetrators.

A number of these options have been detailed in National Working Group (NWG) /BARNADO's: [Criminal, Civil and Partnership Disruption Options for Perpetrators of Child and Adult victims of Exploitation.](#)

These tactics include:

- Slavery and Trafficking and Risk Orders
- Domestic Violence Prevention Notices and Orders
- Forfeiture Orders
- Sexual Harm Prevention and Risk Orders
- Criminal Behaviour Orders
- Community Protection Notices
- Emergency Protection Orders and Police Protection
- Civil Injunctions
- Restraining Orders
- Non-Molestation Orders
- Child Abduction Warning Notices

In addition to the tactics detailed in the [HO Child Exploitation Disruption Toolkit](#), there are specific pieces of legislation, many of which fall within the skills and experience of our partners that we can consider including:

- The National Minimum Wage Act 1998
- The Housing Act 2004 (governing conditions in relation to Houses of Multiple Occupancy)
- Section 179 Licensing Act 2003 (rights of entry to investigate licensable activity and immigration offences)
- Immigration, Asylum and Nationality Act 2006 (ability to issue Civil Recovery Notices in respect of employing illegal migrants)

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- Health and Safety at Work Act 1974 (governing the health and safety of individuals in the workplace)
- Fire and Rescue Services Act 2004 (particularly relevant if we suspect persons are sleeping in or above commercial premises)

All partner organisations that work or volunteer with children, young people or adults, have a duty of care to report any safeguarding concerns. Refer to your organisation's Safeguarding Policy and Procedure or through Families First, Children's Service's Consultation line. Tel: 01752 668000 or via email to familiesfirst@plymouth.gov.uk.

9. Legislation, the law and civil orders

Under the European Court of Human Rights (ECHR), everyone is entitled to the right to life, liberty and security; no one shall be subjected to torture or inhuman or degrading treatment or punishment. Any public body must protect individuals from the violation of these fundamental rights.

The Modern Slavery Act 2015

- **Section 1** provides an offence of slavery, servitude and forced or compulsory labour

1(1) A person commits an offence if – The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

- **Section 2** provides for a single offence of human trafficking covering sexual and non-sexual exploitation

2(1) A person commits an offence if the person arranges or facilitates the travel of another person with a view of [the victim] being exploited. It is irrelevant whether [the victim] has consented to the travel; it is the intent that is relevant

- **Sections 14–22 & 23–29: Slavery and Trafficking Prevention Orders (STPOs) and Slavery and Trafficking Risk Orders (STROs).**
 - Who can apply: Police, National Crime Agency, immigration officers, and GLAA labour abuse prevention officers may apply to a court (including magistrates' court on complaint) for an order where the person is convicted (STPO) or poses a demonstrable risk (STRO).
 - What they can do: Orders can impose tailored restrictions and requirements—including prohibitions on foreign travel and requirements to provide name and address and notify changes—to protect persons from physical or psychological harm likely to occur from slavery/trafficking offences.
 - Interim orders & duration: Courts may make interim orders pending determination; orders can be varied, renewed, or discharged.
 - **Section 30:** Breach of STPO/STRO is a criminal offence (punishable on indictment by up to 5 years' imprisonment).
 - Enforcement: Breach of an order constitutes an offence; officers may arrest a suspect for this indictable offence and pursue prosecution.

Practical note: Use Home Office statutory guidance forms STPO1/STRO1 for applications and follow evidential standards in Part 2 guidance.

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Children Act 1989

- **Section 46** empowers an officer to remove a child to suitable safe accommodation if there is reason to believe that the child would otherwise be at risk of significant harm

Sexual Offences Act 2003

- **Section 14** – It is an offence to arrange or facilitate a child sex offence (child under 16)
- **Section 47** – It is an offence to pay for the sexual services of a child
- **Section 48, 50** – It is an offence to cause, incite, arrange or facilitate child prostitution or pornography
- **Section 49** – It is an offence to control a child prostitute or a child involved in pornography
- **Section 57 to 59:** It is an offence to traffic a child into, within or out of the United Kingdom for sexual exploitation
- **Section 103A – 103K** – Sexual Harm Prevention Orders (SHPO) can be made in relation to a person who has been convicted of or cautioned for a sexual offence (including offences committed overseas) and who poses a risk of sexual harm to the public. The Order can contain any prohibitions aimed at protecting children and others
- **Section 122A-122k** – Sexual Risk Orders (SRO) may impose any restriction the court deems necessary for protecting the public from harm, and requires the individual concerned to notify the police of their name and address, including where this information changes. For an SRO to be imposed, the individual does not need to have committed an offence. An SRO is available on free-standing application to a magistrates' court by the police or National Crime Agency

Working Together to Safeguard Children (2023)

- Section 194 referenced 'supporting children at risk of, or experiencing, harm outside the home. It specifically mentions modern slavery and trafficking, alongside exploitation by criminal and organised crime groups and individuals (such as county lines and financial exploitation), serious violence, online harm, sexual exploitation, teenage relationship abuse, and the influences of extremism which could lead to radicalisation

Care Act 2014 and Care and Support Statutory Guidance 2025

- **Section 14 Safeguarding** This chapter provides guidance on sections 42 to 46 of the Care Act 2014 and covers:
 - adult safeguarding: what it is and why it matters
 - abuse and neglect. (N.b. Modern slavery is a form of abuse)
 - understanding what they are and spotting the signs
 - reporting and responding to abuse and neglect
 - carers and adult safeguarding

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- adult safeguarding procedures
- local authority's role and multi-agency working
- criminal offences and adult safeguarding
- safeguarding enquiries
- Safeguarding Adults Boards
- Safeguarding Adults Reviews
- information sharing, confidentiality and record-keeping
- roles, responsibilities and training in local authorities, the NHS and other agencies

Link here <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#safeguarding-1>

Anti-Social Behaviour Act 2014

- **Section 76** of the Anti-Social Behaviour, Crime and Policing Act 2014 allows the police and local authority to issue a closure notice on a premises if they have reasonable grounds to believe that use of the premises has resulted in, or is likely soon to result in, nuisance to the public or disorder, and that the notice is necessary to prevent the nuisance or disorder from continuing, recurring or occurring.

Powers under the Police and Criminal Evidence Act (PACE)

- **Section 17:** Power for a Constable to enter a premise without a warrant to save life or limb, or arrest a person where there are reasonable grounds for believing that the person you seek is on the premise.
- **Section 24:** Power for a constable to arrest anyone who has committed an indictable offence, is about to commit an indictable offence, is committing an indictable offence or has reasonable grounds to suspect either one of the above.

I 0. How to report a concern about Modern Slavery

If you see a crime in progress or someone is in immediate danger telephone 999.

Intelligence:

Devon and Cornwall Police rely on intelligence from communities, partners and other law enforcement agencies. Intelligence can come from a range of sources such as a concerned member of the community worried about a neighbouring address, a local authority worker who has received a disclosure from a person, or from police in another area.

Report Intelligence using the [Devon and Cornwall Police Partnership Intelligence sharing form](#) or through the [Police Intelligence link](#).

How to report a safeguarding concern to Plymouth City Council:

Worried about a child:

Families First, Children's Service's Consultation line. Tel: 01752 668000 or via email to familiesfirst@plymouth.gov.uk

Worried about an adult at risk, click on this link to report a concern:

<https://www.plymouth.gov.uk/report-adult-abuse-neglect-or-safeguarding-concern>

General enquiries and outside office hours, at weekends and on public holidays contact the Emergency Duty Team Telephone: 01752 668000

First Responders:

If you're a first responder working for a [designated organisation](#) you can use the following services to:

- refer potential victims of any age to the National Referral Mechanism
- help potential victims receive support and medical care
- notify the Home Office of potential victims (Duty to Notify)

[Report modern slavery – GOV.UK](#)

Call the Modern Slavery Helpline on 0800 0121 700 or report it online by clicking on this link

<https://www.modernslaveryhelpline.org/report>

Support and safety for children are considered through Child Exploitation Risk Assessments which are discussed and endorsed through a Multi-Agency Child Exploitation Risk Assessment Panel. Individualised support, safety and disruption are

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then managed through the child's individual plan at all levels – Early Help, Child in Need, Child Protection and Children in our care.

For Children at risk of Exploitation, these multi-agency partners will consider disruption, safety and support through the child's Multi-agency plan and Multi-agency Child Exploitation disruption meetings.

To report information about modern slavery 100% anonymously, contact the charity Crimestoppers on 0800 555 111 or online at www.crimestoppers-uk.org

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11. Contacts – Local and National Organisations

NRM Single Competent Authority (SCA)

NRM Single Competent Authority (SCA)
Tackling Slavery and Exploitation Directorate
Serious and Organised Crime Group
Tel. No. 020 7035 5689
Email: nationalreferralmechanism@homeoffice.gov.uk

Gangmasters & Labour Abuse Authority (GLAA)

Report problems: 0800 4320804
Email: licensing@gla.gov.uk

H.O. Immigration Enforcement

[Contact details for immigration compliance and enforcement teams - GOV.UK](#)

H.O. Command and Control UNIT (CCU)

Tel. No. 0300 0134999 (for live time status and intelligence checks)

[Hope for Justice](#)

Hope for Justice
P.O. BOX 5527,
Manchester, M61 0QU
Tel. No. 0300 008 8000
Email: info.uk@hopeforjustice.org

[Independent Child Trafficking Advocates \(Barnardo's\)](#)

Tel. No. 0800 043 4303 (24/7 referral and support help line)
Email: countertrafficking@barnardos.org.uk (general enquiries)

Devon and Somerset Fire and Rescue

[Homepage | Devon and Somerset Fire and Rescue Service](#)

Plymouth City Council Housing

[Housing Services | PLYMOUTH.GOV.UK](#)

Plymouth City Council Protective Services (Licensing & Environmental Health)

[Public Protection advice and support | PLYMOUTH.GOV.UK](#)

Heart of South West Trading Standards

[Trading standards - Devon, Plymouth, Somerset and Torbay](#)

His Majesties Revenue & Customs

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[HMRC inspections - His Majesty's Inspectorate of Constabulary and Fire & Rescue Services](#)

National Minimum Wage

Serious Non-Compliance Team
Office Tel. No. 03000 538706

Department for Work and Pensions (Plymouth)

64 Exeter Street, Plymouth PL40AJ

Tel. No. 08001690190

[Contact Jobcentre Plus - Find your nearest office - GOV.UK](#)

The Salvation Army

Tel: +44 (0)30 0303 8151

Email info@salvationarmy.org.uk

Web: <http://www.salvationarmy.org.uk/human-trafficking>

The Children's Society

Tel: 030 0303 7000

Email safeguarding@childrenssociety.org.uk

Web: <http://www.childrenssociety.org.uk/>

Ivison Trust (formerly PACE)

[Ivison Trust](#)

Crimestoppers: Crimestoppers: If you have information on crime or criminals you can contact us, as an independent charity, 100% anonymously – your identity will never be revealed. If you are already in the UK, call free on 0800 555 111 or report details online:

[Giving information anonymously | Crimestoppers](#)

[Modern slavery | Crimestoppers](#)

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I2. Further information

Guides and resources

Relevant guidance can be accessed on the following webpages:

Plymouth Safeguarding | [Livewell Southwest](#)

Plymouth Safeguarding Children Board [Right Help, Right Time - Plymouth Safeguarding Children Partnership](#)

North Yorkshire Safeguarding Adults Board: [NYSAB](#), [NYSAB](#)

[Transitional Safeguarding](#)

Useful websites

[Plymouth Safeguarding Adults Partnership | PLYMOUTH.GOV.UK](#)

[Front Page - Plymouth Safeguarding Children Partnership](#)

Modern slavery – GOV.UK (www.gov.uk)

Anti- Slavery Partnership Toolkit: [Home – Anti-Slavery Partnership Toolkit \(nottingham.ac.uk\)](#)

The Clewer Initiative: [The Clewer Initiative | The Clewer Initiative](#)

[Human Trafficking Foundation](#)

Hope for Justice: [Hope for Justice | End Slavery. Change Lives.](#)

Anti-Slavery: [Anti-Slavery International | Fighting for Freedom from Slavery \(antislavery.org\)](#)

Framing Modern Slavery: A messaging guide – [Modern Slavery PEC | framing, modern, slavery](#)

Training and resources

[Hope for Justice | Hope for Justice Learning Academy | UK online training | Free Modern Slavery Training](#)

[December 2023 NYSCP Masterclass Modern Slavery](#)

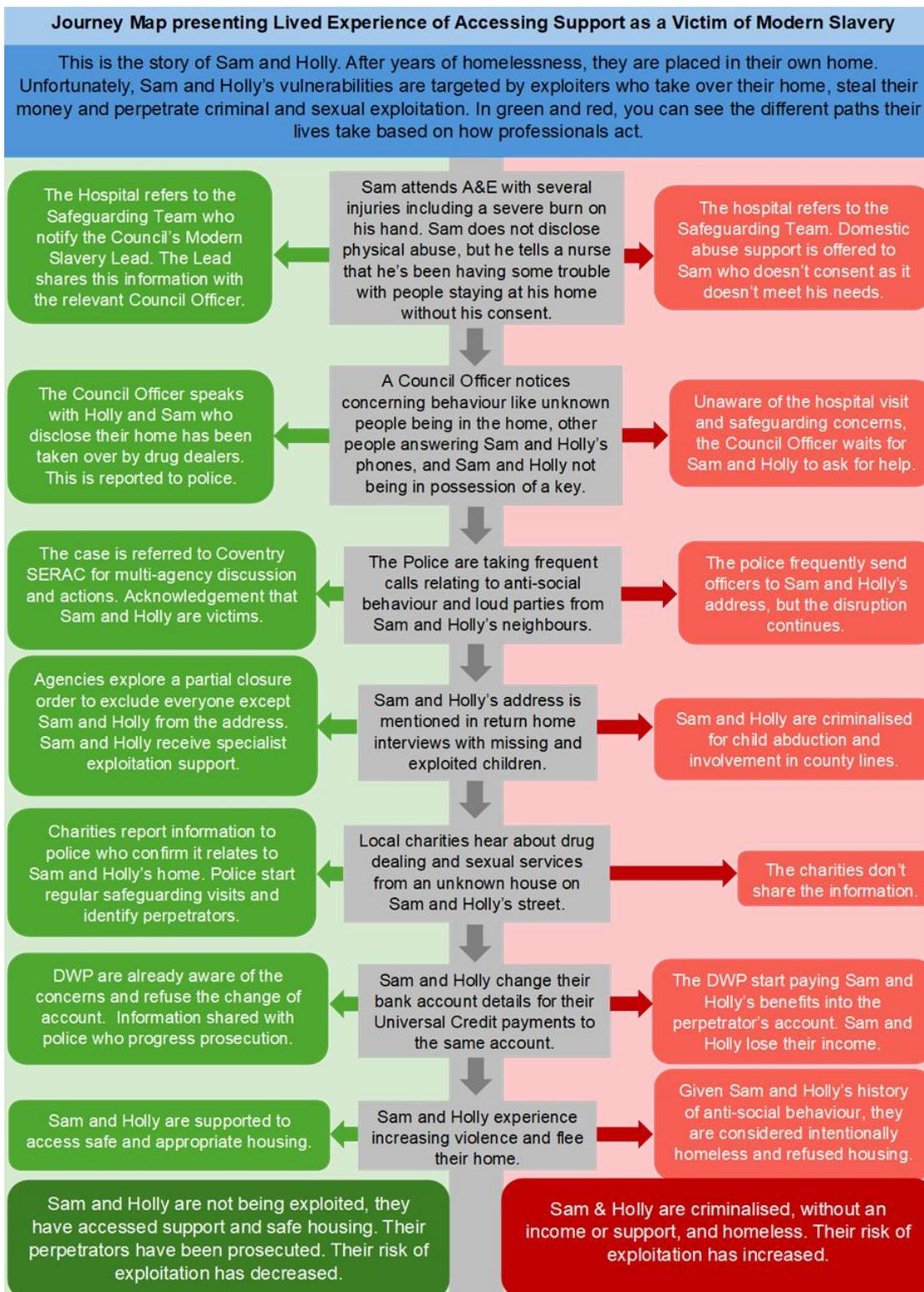
[NYSC Podcast Mythbusting Modern Slavery \(youtube.com\)](#)

[Working Together To Disrupt Child Exploitation In North Yorkshire \(youtube.com\)](#)

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Appendix A



Appendix 2

Glossary

4P approach to modern slavery: The UK Government's strategy which aims to reduce the prevalence of modern slavery in the UK by prioritising four components: prosecuting and disrupting individuals and groups responsible for modern slavery (Pursue); preventing people from engaging in modern slavery crime (Prevent); strengthening safeguards against modern slavery by protecting vulnerable people from exploitation and increasing awareness and resilience against this crime (Protect); and reducing the harm caused by modern slavery through improved survivor identification and enhanced support and protection (Prepare).

Abduction: the act of making a person go somewhere with you using pressure, threats or violence.

Bad faith: An individual may be considered to have claimed to be a survivor of modern slavery in bad faith where they, or someone acting on their behalf, have knowingly made a dishonest statement in relation to being a survivor of modern slavery.

Best practice: professional procedures that are accepted as being most effective.

Coercion: the use of force or intimidation to obtain compliance.

Deception: the act of causing someone to accept as true or valid what is false or invalid.

Duty to Notify (DtN): is the duty placed on public authorities in England and Wales by section 52 of the Modern Slavery Act 2015 to notify the Secretary of State when encountering a potential survivor of Modern Slavery. In practice, this is discharged by informing the Home Office.

European Convention on Human Rights: The Convention protects the right to: life, freedom and security, respect for private and family life, freedom of expression, freedom of thought, conscience and religion, vote in and stand for election, a fair trial in civil and criminal matters, property and peaceful enjoyment of possessions. The Convention prohibits: the death penalty, torture or inhuman or degrading treatment or punishment, slavery and forced labour, arbitrary and unlawful detention, discrimination in the enjoyment of the rights and freedoms secured by the Convention, deportation of a state's own nationals or denying them entry and the collective deportation of foreigners.

Exploitation: Exploitation occurs when an exploiter uses means of control such as the threat or use of force, coercion, abduction, fraud, deception, or an abuse of power or vulnerability to use another person for personal, financial, or commercial

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gain. Exploitation may include sexual exploitation, forced labour, domestic servitude, forced criminality, slavery, financial exploitation, or removal of organs.

First responders: referrals to the NRM can only be made by authorised agencies known as First Responders. First Responders are responsible for identifying potential survivors, gathering information and referring them to the NRM or, in the case of adults, notifying the Home Office if someone does not consent to being referred.

Fraud: is any activity that relies on deception to achieve a gain. Fraud becomes a crime when it is a knowing misrepresentation of the truth.

Gender specific needs: survivors may need access to single sex support and accommodation due to previous trauma associated with a particular gender.

Holistic support: support which treats the whole of someone and not just a part.

Human trafficking: the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit.

Immigration Enforcement Competent Authority ('IECA'): is one of the competent authorities that is responsible for making Reasonable Grounds decisions and Conclusive Grounds decisions regarding individuals in the following groups: All adult Foreign National Offenders (FNOs) detained in an Immigration Removal Centre. All adult FNOs in prison where a decision to deport has been made. All adult FNOs in prison where a decision has yet to be made on deportation. Non-detained adult FNOs where action to pursue cases towards deportation is taken in the community. All individuals detained in an Immigration Removal Centre (IRC) managed by the National Returns Command (NRC), including those in the Detained Asylum Casework (DAC) process. All individuals in the Third Country Unit (TCU)/inadmissible process irrespective of whether detained or non-detained.

Independent Child Trafficking Guardians (ICTGs): The ICTG service provides somebody who can speak up on behalf of, and act in the best interests of, the child. The ICTG service model provides two discrete services to children who have been trafficked; ICTG Direct Worker to support children for whom there is no one with parental responsibility for them in the UK and ICTG Regional Practice Co-ordinator whose role is to focus on children who do have a figure with parental responsibility for them in the UK.

Lived Experience Consultants: A lived experience consultant is skilled with the ability to share wisdom and insights they have gained from walking their path in life. They are commissioned to provide input on the impact of an organisation's work on people who have similar experiences to their own.

Lived experience: Personal knowledge about the world gained through direct, first-hand involvement in events rather than through representations constructed by other people.

Modern Slavery Lead: A role within Plymouth City Council with responsibility for developing and implementing the Council's approach to exploitation through various operational and strategic responsibilities.

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Modern slavery statement: Certain commercial organisations must publish an annual statement setting out the steps they take to prevent modern slavery in their business and their supply chains. This is a requirement under section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015.

Modern slavery: an umbrella term which encompasses all forms of slavery, human trafficking, and exploitation. In all forms of modern slavery an exploiter uses means of control such as the threat or use of force, coercion, abduction, fraud, deception, or an abuse of power or vulnerability to exploit another person for personal, financial, or commercial gain. This exploitation may include sexual exploitation, forced labour, domestic servitude, forced criminality, slavery, financial exploitation, or removal of organs. People who are subjected to modern slavery can be children or adults, of any gender, from all backgrounds, countries, and communities.

National Referral Mechanism (NRM): refers to the UK's framework for identifying and referring potential survivors of modern slavery and ensuring they receive the appropriate support. Consent is required for an adult to be referred to the NRM. If an adult does not consent to enter the NRM, a DtN referral should be completed using the same online process. Adults in England and Wales who are recognised as a potential survivor of modern slavery through the NRM have access to specialist tailored support for a period of at least 30 days while their case is considered.

Perfect victim: is a myth which dictates that victims should be weak or vulnerable and involved in a respectable activity at the time of victimisation.

Police and Crime Board (PCB): Otherwise known as the Community Safety Board, the Police and Crime Board is a requirement within the Crime & Disorder Act 1998. Several agencies were given "Responsible Authority" status that places a statutory duty on them to work together and do all they reasonably can to prevent, detect and reduce crime and nuisance and prevent re-offending. These agencies must work with local businesses and communities to improve the safety of the communities they live and work in.

Priority need: Housing authorities have duties to try and prevent or relieve homelessness for all applicants who are eligible for assistance and are homeless or threatened with homelessness, irrespective of whether they may have a priority need for accommodation. If a housing authority is unable to prevent an applicant from becoming homeless, or to help them to secure accommodation within the 'relief' stage, they are required to reach a decision as to whether the applicant has a priority need for accommodation. Examples of categories of priority need are pregnancy, dependent children, domestic abuse, physical or mental disability, time in care as a child, risk of violence.

Public health: public health contributes to reducing the causes of ill-health and improving people's health and wellbeing through health protection, and health services.

Re-trafficked: Re-trafficking refers to when a survivor of trafficking has been trafficked and/or exploited on more than one occasion.

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Single Competent Authority (SCA): refers to one of the UK's decision-making bodies that is responsible for making Reasonable Grounds decisions and Conclusive Grounds decisions regarding individuals not in the groups covered by the IECA.

Slavery and Exploitation Risk Assessment Conference (SERAC): The purpose of the SERAC is to establish a forum - where suspected or known cases of exploitation/slavery/trafficking can be discussed, in confidence, with an open exchange of information so that a multi-agency plan of action can be developed. The aim of this is to increase effectiveness and co-operation between agencies to result in better service provision, greater protection for survivors and better outcomes and safeguarding interventions for individuals who have been exploited.

Slavery and Trafficking Prevention Orders: STPOs are aimed at those convicted, cautioned, who received a reprimand or final warning in respect of a slavery or human trafficking offence, but cannot be put on trial in the usual way because they are not fit to plead/stand trial. The Court may impose a wide range of restrictions on individuals depending on the nature of the case, if these are necessary to prevent harm associated with slavery or trafficking offences. The Orders are designed so that law enforcement bodies and the Courts can respond flexibly to the risks posed by an individual of committing future modern slavery offences.

Slavery and Trafficking Risk Orders: STROs are aimed at individuals who have not been convicted of a slavery or human trafficking offence but there is a risk of them committing these offences in the future. The Court may impose a wide range of restrictions on individuals depending on the nature of the case, if these are necessary to prevent harm associated with slavery or trafficking offences. The Orders are designed so that law enforcement bodies and the Courts can respond flexibly to the risks posed by an individual of committing future modern slavery offences.

Social capital: the networks of relationships among people who live and work in a particular society, enabling that society to function effectively.

Supply chains: A supply chain is a network of individuals and companies that are involved in creating a product and delivering it to the consumer.

Survivor: someone who has been subjected to modern slavery. Often used to describe someone who has left exploitation. Often interchangeable with the term victim. Some people prefer this term to victim as it is perceived as a more empowering word.

Temporary leave to remain for survivors of slavery or human trafficking: A survivor with a positive conclusive grounds decision and no existing right to remain in the UK is automatically considered for permission to stay. Leave is given based on the survivor needing to receive medical treatment, contribute to a criminal justice process or apply for compensation in the UK. VTS leave does not provide a route to settlement, although longer periods of stay might be considered under the VTS Guidance.

The push and pull factors of exploitation: these factors are what increases someone's risk of being targeted by exploiters. Push factors include war and conflict,

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lack of job opportunities and lack of support network. Pull factors include economic and social stability, the promise of a better life, a sense of belonging.

Threat to public order: applies when the competent authority is satisfied that the individual is a threat to public order and that disqualification from NRM support is appropriate considering the individual recovery needs of the person.

Transition to adulthood: The transition to adulthood is a process that brings childhood to an end and turns the individual into a young adult at the age of 18. This process is characterised by the acquisition of new roles for young people, roles linked to the development of personal autonomy that culminate in their emotional and functional independence.

Trauma-informed support: Trauma-informed support acknowledges the widespread impact of trauma on an individual's neurological, biological, psychological and social development. Trauma informed support aims to help the individual to understand paths for recovery and actively avoid re-traumatisation through multi-agency interventions.

UK Independent Anti-Slavery Commissioner: The Commissioner's role is independent from Government and is to 'encourage good practice sharing' amongst all those with a role to play in tackling every aspect of modern slavery and human trafficking in the UK. The Modern Slavery Act also places a duty on public authorities to co-operate with the Commissioner, share data with their office and comply with requests. The legislation is clear that the Commissioner has no responsibility for or powers over individual cases.

Wider determinants of health: a range of social, economic and environmental factors which impact on people's health. They're also known as social determinants. These factors are influenced by the local, national and international distribution of power and resources which shape the conditions of daily life. They determine the extent to which different individuals have the physical, social and personal resources to identify and achieve goals, meet their needs, and deal with changes to their circumstances.