



**Hillingdon Safeguarding  
Partnership**



## **Modern Slavery, Human Trafficking and Exploitation Practice Guidance 2023**

### **Key Messages for Practice**

**If you suspect that a child or adult is at immediate risk call 999**

#### **For Children**

**Trafficking and modern slavery is always a safeguarding matter.** If you suspect a child has been trafficked or exploited telephone the **Stronger Families Hub 01895 556006** and call **Police**. You do not need consent for the safeguarding referral or police report.

#### **For Adults**

**Trafficking and Modern Slavery is always serious and requires a response.** Contact the **Modern Slavery Helpline 08000 121 700** for advice and support. If you believe the **adult has care and support needs**, it is also a **safeguarding concern**. Report to Adult Social Care on 01895 556633 or complete **this form**.

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## Introduction

Building practitioner knowledge and confidence around identifying and responding to modern slavery and human trafficking is critical to ensuring a robust local safeguarding response to adults and children at risk. This document provides guidance on what practitioners working within Hillingdon should do if they encounter a potential child or adult victim of modern slavery or human trafficking. Protecting victims from further trafficking or slavery is the first priority.

Trafficking is not always across international borders; it happens within the UK too. Victims of trafficking and modern slavery within the UK are often UK citizens. Adults and children who have been trafficked and/or enslaved are likely to experience multiple physical and mental health risks as a result.

### What is Human Trafficking?

Human trafficking involves the recruitment or movement of people for exploitation using threat, force, or fraud with a view to systematically exploiting/enslaving them. It is always a crime. Men, women, and children may be victims.

### What is Modern Slavery?

Modern slavery includes but is not limited to:

- sexual exploitation including forced prostitution, engagement in sex acts of any kind, and/or production of pornography
- forced labour
- domestic servitude
- forced benefit fraud
- organ harvesting
- forced involvement in criminal activity such as pick-pocketing and theft
- forced begging
- drug production and distribution, including what is known as 'county lines'.

Individuals are often exploited in multiple ways at once. Some people are not aware they are being exploited, for example people who have grown up in servitude, those with a learning disability or mental health issue, or people who simply have no knowledge of their rights. Some people are also groomed in a way that can affect their understanding and recognition of the exploitation they experience.

## Signs and Indicators

There are common signs and indicators to look out for to help you identify adults or children who are victims of slavery and/or trafficking. These factors being present indicate a need to be curious and explore whether slavery or trafficking are affecting individuals.

### Signs and Indicators for Children:

- [Private fostering.](#)
- [Missing episodes](#) – from home or from care.
- Unexplained injuries.
- Significant change in presentation (physical or emotional).
- New belongings that are unexplained.
- Unaccompanied children.
- Lack of, or falsified, identification or travel documents.
- [Children missing from education.](#)
- Involvement in criminal activity including [county lines](#), drug trafficking or dealing.
- Overburdened with domestic duties or caring for other children.
- Change in who they are spending time with, or increased secrecy about this.



### Signs and Indicators for Adults:

- Involvement in begging and/or benefit fraud.
- An absence of identity or travel documents, or falsified documents.
- Working in settings that can be associated with forced labour for example, hand car washes, nail bars, agriculture, sex work.
- Working against their will and/or being unable to leave their work environment or home environment despite poor working or living conditions, or little to no pay.
- Expressing concern that their movements and/or communications and/or finances are being monitored or controlled.
- Experiencing violence or threats of violence against themselves or against their family members and loved ones.
- Not knowing their home or work address.
- Allowing others to speak for them when addressed directly.
- Being distrustful of the authorities and/or afraid of revealing their immigration status.
- Untreated medical conditions, physical or mental health.

Adults and children with mental health problems, learning disabilities, or physical vulnerabilities are at increased risk of trafficking and modern slavery, though anyone can be a victim.

The [Home Office](#) provides online resources to support the identification and response to all victims of modern slavery and trafficking.

## Best Practice Tips

- Act fast, take a suspected victim seriously, think safety first!
- Call 999 if you suspect any immediate risk.
- Report suspected crime to police on 101 if no immediate risk.
- Facilitating safe shelter, food and warmth is critical to protecting children and adults.
- Always use a professional interpreter if the suspected victim doesn't speak fluent English.
- Provide privacy for any communication.
- Be curious and take time to listen to people's experiences and remember they may be traumatised, distressed, and scared.
- Be aware that victims may be facing very high risks to seek help – the first time they speak to you may be the only chance they get.
- Notify your agency safeguarding lead/single point of contact for modern slavery (if you have one) and ensure that any concerns are documented in detail.

## What is the National Referral Mechanism (NRM)?

The National Referral Mechanism is the UK Government framework for ensuring that child and adult victims of trafficking and modern slavery receive appropriate protection and support. Through the NRM, adult and child victims can get access to vital practical and emotional support to promote safety and recovery. This includes:

- safe housing,
- material support,
- legal advice and representation,
- specialist therapeutic support, and
- support with future planning.

The NRM operates alongside statutory child and adult safeguarding procedures; it does not supersede them.

The NRM is also the mechanism which initiates investigation by a Competent Authority to establish whether the person, on balance of probabilities, is or isn't a victim of trafficking and/or modern slavery. The UK Human Trafficking Centre (UKHTC) and Home Office are the UK's two Competent Authorities.

If you work for a First Responder organisation click on this icon to:



Report modern slavery

➤ start the National Referral Mechanism for a child or a consenting adult

OR

➤ to fulfil your Duty to Notify the Home Office of suspected Modern Slavery or Trafficking where an adult does not consent.

### Potential Outcomes of a referral into the National Referral Mechanism

Once a referral has been made by a First Responder into the National Referral Mechanisms there are two key stages to the decision making by the Competent Authority:

**a. Reasonable Grounds decision should be made, where possible, within 5 working days** of referral to the NRM, but only when there is sufficient information available to do so. The decision is whether the competent authority believes:

- there are reasonable grounds to suspect that the person is a victim of human trafficking and/or modern slavery; or
- there are **no** reasonable ground to suspect that the person is a victim of trafficking or modern slavery.

Following a positive reasonable grounds decision, adults are then entitled to support from the Salvation Army as part of the Modern Slavery Victims Care Contract for at least 30 days. Children are provided appropriate supports through Children's Social Care according to need and circumstances.

**b. Conclusive Grounds decision should be made 30 days** after the reasonable grounds decision, as long as information has been provided to the competent authority in a timely fashion. In many cases it will take significantly longer for all relevant information to be available to inform the decision. The decision to be made is whether:

- on the balance of probabilities, there are grounds to believe the person is, or is not, a victim of human trafficking or modern slavery. This threshold is higher than the reasonable grounds test, but lower than the criminal standard of proof.

## Do you work for a ‘First Responder’ organisation?

Trafficking and Modern Slavery are crimes. The [Modern Slavery Act 2015](#) is the key piece of primary legislation governing the UK response to the crimes of human trafficking and modern slavery. The Government has issued Statutory Guidance to accompany the act: [Modern Slavery: Statutory Guidance for England and Wales](#). This sets out the legal duties of First Responder organisations and their staff. It is important to understand your responsibilities if you work for a First Responder organisation.

**First Responders** are:

- All police forces
- Hillingdon Council
- Certain parts of the Home Office: UK Visas and Immigration, Border Force, Immigration Enforcement
- [National Crime Agency](#)
- [Gangmasters and Labour Abuse Authority \(GLAA\)](#)
- [Modern Slavery Helpline - Unseen](#)
- Specific specialist voluntary sector organisations: [Salvation Army](#), [Migrant Help](#), [Medaille Trust](#), [Kalayaan](#), [Barnardo’s](#), [BAWSO](#), [NSPCC](#)

It is a **legal obligation** on employees of First Responder organisations to:

- **Identify potential victims** of modern slavery.
- **Gather information** in order to understand what has happened to them.
- **Refer all victims into the National Referral Mechanism** (including completing a Duty to Notify form if an adult victim doesn’t consent to being referred to the NRM) via the [Modern Slavery Portal](#).
- **Provide a point of contact** for the competent authorities so that they can contact the first responder for additional information to support with the Reasonable Grounds and Conclusive Grounds decisions and to request a reconsideration. It is highly likely they will contact the First Responder for more information within 5 days.

## Responding to Concerns About a Child

**If you suspect that a child is at immediate risk call 999.**

**If you suspect a child in Hillingdon is experiencing or at risk of experiencing trafficking or modern slavery, telephone the Stronger Families Hub 01895 556006. It is a safeguarding issue.**

For a safeguarding referral about suspected trafficking or modern slavery, you do not need parental consent. [London Safeguarding Children Procedures](#) and [Working Together to Safeguarding Children](#) explain the procedures to safeguard children who have experienced or are at risk of experiencing trafficking or modern slavery. Also, please go to the [local children's pathway for step-by-step guidance](#).

### Child Victims and the National Referral Mechanism

If the potential victim is under 18, or you think they *may* be under 18, the National Referral Mechanism **must** be used. This must be done by a First Responder organisation. The most appropriate First Responder to do this is whichever first becomes aware of the concern.

For First Responder organisations, the NRM referral should be completed concurrent to the referral to Children and Young People's Services. Where the agency identifying and raising the concern is not a First Responder, the NRM will be completed by Children and Young People's Service. Whilst the First Responder should not seek the child's consent, it is always best to speak to the child about what is happening and support them to feel involved in the process and decision making about them.



## Independent Child Trafficking Guardians (ICTG)

If they have been trafficked, children have a right to an Independent Child Trafficking Guardian.



### What does an Independent Child Trafficking Guardian do?

- ICTG's support, advocate for and represent a child or young person who is unaccompanied if they are a victim of trafficking or at risk of becoming so, and if no person in the UK has parental rights or responsibilities in relation to the child.
- Support provided is based on the individual needs of the child and is not time limited. It is intended to prevent further harm.
- Support will continue following their 18th birthday if the child needs it.
- British national children or those who have a figure of parental responsibility in the UK won't receive direct 1:1 support from ICTG, but the professionals working with them can still get support through ICTG.
- Non-British national children will always also receive direct 1:1 support by ICTG too.

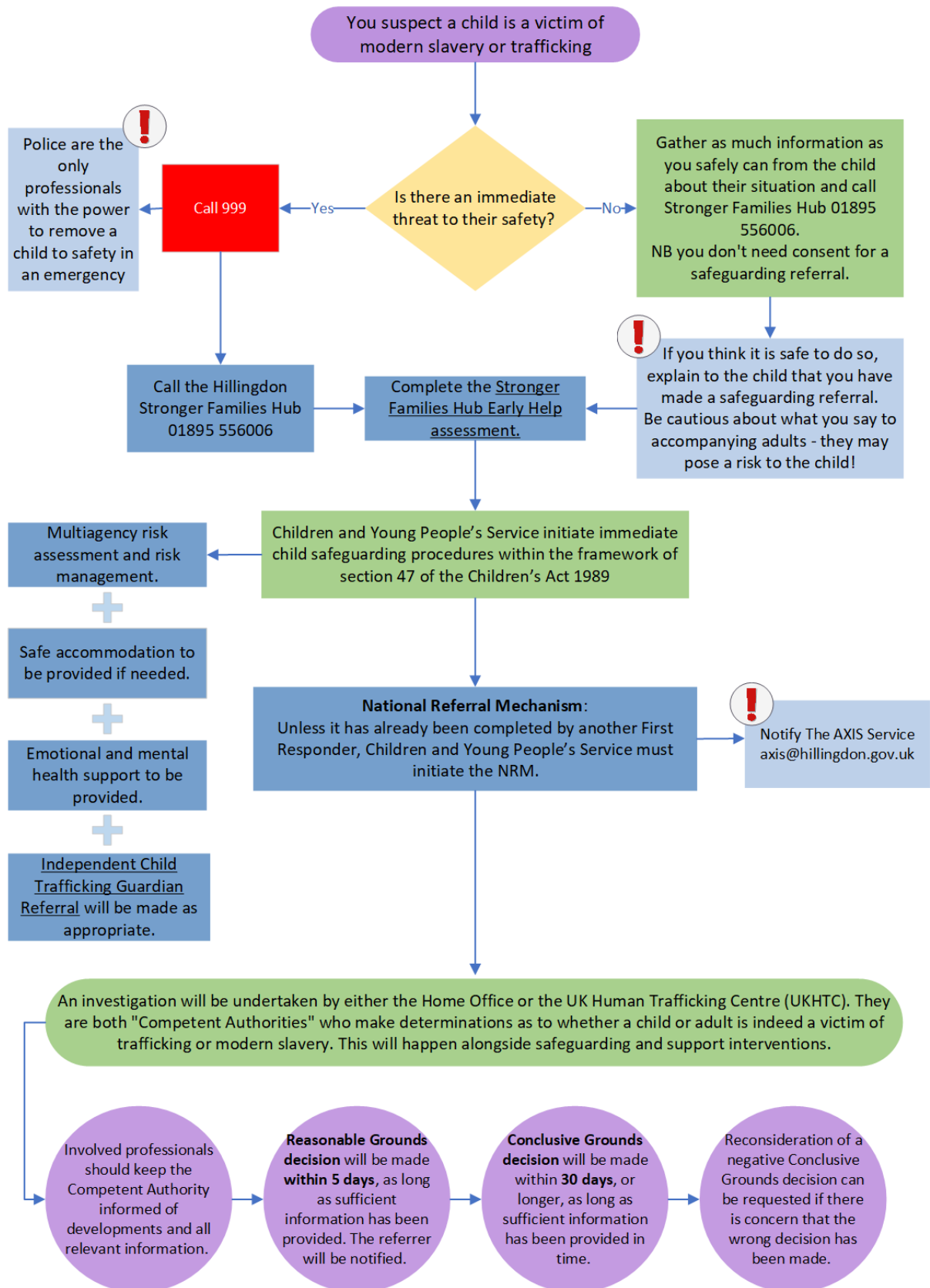
Make a referral here: [ICTG service referral form | Barnardo's \(barnardos.org.uk\)](#)

## The Role of the AXIS Service

When the NRM referral is made for a child, the Local Authority AXIS service **must** be notified and the process below must be followed:

Step 1	Inform Hillingdon's AXIS Service of the NRM referral and send AXIS Service a copy. The AXIS Service can be contacted at <a href="mailto:axis@hillingdon.gov.uk">axis@hillingdon.gov.uk</a>
Step 2	The AXIS Service will collate and record the child's details, who is making the referral and who will monitor response times in line with the guidance from the Home Office. NRM referrals will be captured within AXIS data as either 'Criminal Exploitation' or 'Sexual Exploitation'.
Step 3	Make a written record on your organisation's recording system e.g. LCS/EHM, detailing completion and stage of referral.
Step 4	Advise AXIS Service on receipt of a positive or negative reasonable grounds decision (this should be within 5 working days of the referral being sent).
Step 5	Advise AXIS Service on receipt of a positive or negative conclusive grounds decision (this should be within 30 working days).
Step 6	Where responses fall out of the above timescales or there is a negative conclusive grounds decision, AXIS Service will advise the referrer and support follow up where possible.

# Child Victim Pathway Flowchart



## Responding to Concerns About an Adult

**If you suspect that an adult is at immediate risk call 999.**

**Trafficking and modern slavery are crimes and should be reported to police – for non-urgent situations report to 101.**

### Adult Victims and the National Referral Mechanism

If you are a Police Officer, a Local Authority employee (any department, in any capacity), or a Border Force Officer you are a modern slavery and trafficking “First Responder”, according to the law. This means you have a legal obligation to refer consenting suspected adult victims into the National Referral Mechanism. For those who do not consent, you have a Duty to Notify the government using the [Modern Slavery Portal](#).

For an adult to provide their informed consent, you must explain:

- what the NRM is,
- [what support may be available through it](#)
- [what the possible outcomes are for an individual being referred](#)
- that information may be shared by the Home Office with other authorities such as police or Local Authorities.

Where an adult lacks mental capacity to consent to a referral a decision on using the NRM must be made in their best interests.

### Risk Mitigation and Support



The Salvation Army provides specialist support for adult survivors of modern slavery who have been referred into the NRM. They provide housing where necessary, advocacy, and emotional and practical support. This includes victims who have No Recourse to Public Funds

**Referral Helpline 0800 808 3733 is available 24/7.**

Where an adult consents to the NRM, as well as completing the online referral the first responder needs to mitigate risk as far as possible. The best way to do this is refer the person straight away for specialist support from the Salvation Army.

Regardless of whether the adult has consented to the NRM, the person may be entitled to local authority housing, and NHS mental or physical health care. First Responders should explore these options where it is needed.

Adults who do NOT consent to entering the NRM should be encouraged to reconsider. It may be helpful to support them to contact the Salvation Army helpline to discuss their situation and help them reach a more informed decision. Note: adults cannot access Salvation Army support with housing, money, legal support and advocacy unless they consent to enter the NRM.

➤ **Local Authority Housing Options**

[Section 188\(1\) of the Housing Act 1996](#) and the [Homelessness Code of Guidance for Local Authorities](#) requires The London Borough of Hillingdon to provide accommodation for an applicant if they have reason to believe that the applicant may be homeless, eligible for assistance and have a priority need. London Borough of Hillingdon Housing Options Service provides an [online self-assessment form](#) to determine whether someone could be owed a housing duty by the local authority.

People can be rendered vulnerable, in the meaning of the Housing Act 1996, by virtue of being victims of modern slavery and/or trafficking. London Borough of Hillingdon should ensure that interim accommodation is available where the victim is suspected to be homeless, eligible for assistance and in priority need, while they are waiting for the outcome of the investigation into modern slavery or trafficking by the home office and/or while the London Borough of Hillingdon carries out its enquiries into the applicants housing status, eligibility for assistance or vulnerability.

➤ **No Recourse to Public Funds**

If a possible victim of trafficking or slavery has No Recourse to Public Funds they will not be eligible for housing assistance through the Housing Act 1996, but will still be able to rapidly access safe accommodation and support through the Salvation Army Modern Slavery Victim Care Contract if they have consented to the NRM, unless and until a negative reasonable or conclusive grounds decision is made.

If they are claiming asylum in the UK they may also be entitled to support from [Migrant Help](#).

### [Guidance for Non-First Responders](#)

If you **do not** work for a First Responder organisation then you should support the person to contact the [Modern Slavery Helpline 08000 121 700](#) or contact them yourself for guidance. The helpline can talk you or the adult through the issues, assess risk, and provide expert advice and facilitate access to

support. The Modern Slavery Helpline is also a First Responder so can complete the National Referral Mechanism for the adult.

### Safeguarding Adults with Care and Support Needs

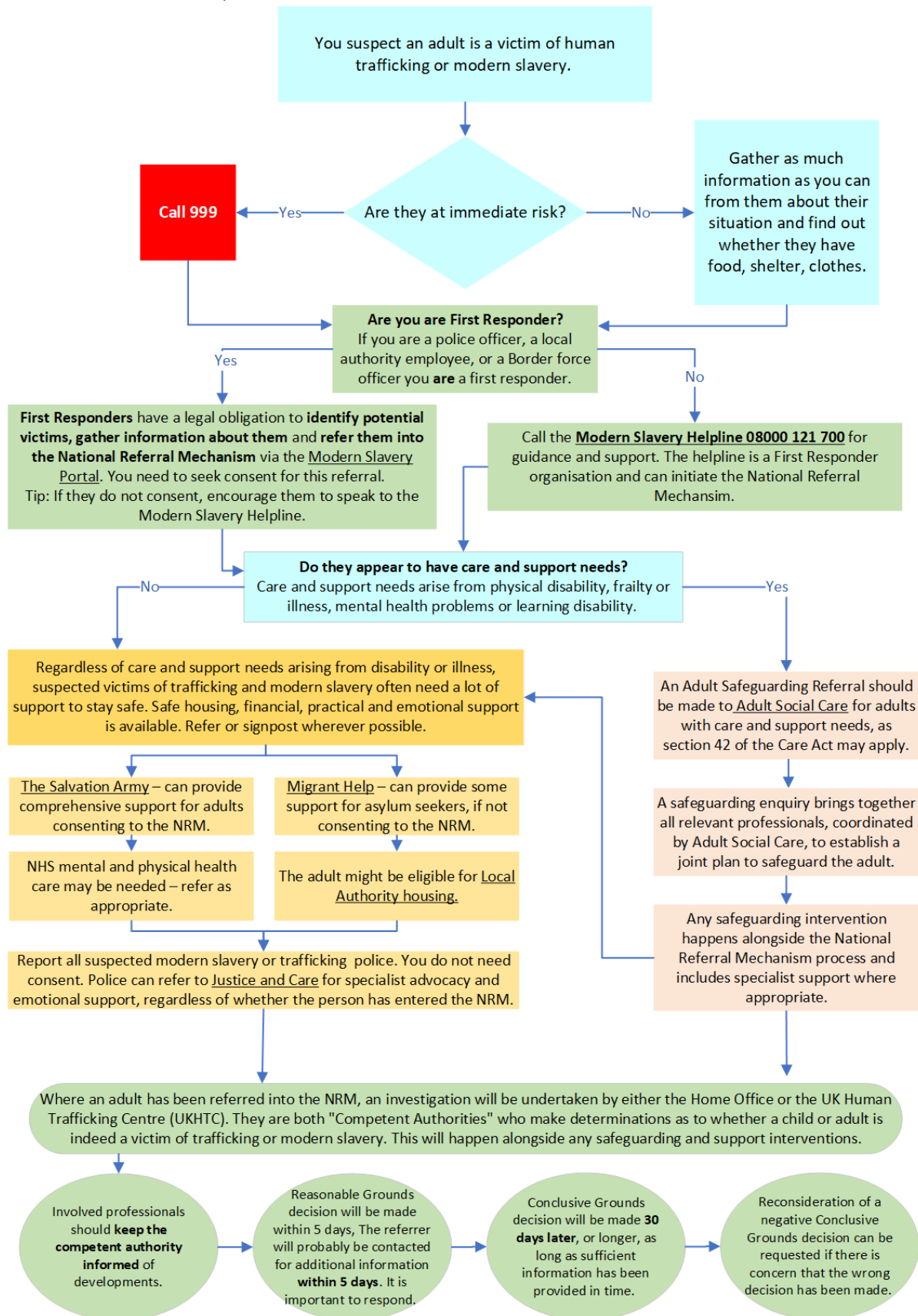
For adult victims with care and support needs there are additional duties under the Care Act 2014 for all professionals, regardless of whether they are first responders, to provide an adult safeguarding response. Care and support needs can arise from physical illness or disability, mental illness, learning disability, and frailty. Duties under the Care Act apply regardless of whether or not the person consents to the NRM.

If you suspect an adult with care and support needs is experiencing or at risk of experiencing modern slavery or trafficking make a referral to Adult Social Care on 01895 556633, or complete this [online referral form](#).

If it is safe to do so, discuss this with the adult first in a private and confidential space. However, in light of the high risk associated with trafficking and modern slavery, the role of coercion and control, and the fact that perpetrators of modern slavery and human trafficking often involve multiple victims, it is usually appropriate to raise the safeguarding concern without consent. If you are unsure, please contact Adult Social Care on 01895 556633.

If an adult victim has care and support needs, and these needs make it difficult for them to protect themselves, there is a duty on the Local Authority to make enquiries pursuant to [section 42 of the Care Act 2014](#) to establish a safeguarding plan. Modern slavery and trafficking are serious forms of abuse, both of which can be perpetrated against people with care and support needs. Being victimised can also bring about care and support needs as a result of the physical and mental harm caused.

## Adult Victim Pathway Flowchart



## Key Contacts



**Metropolitan Police Central Specialist Crime Modern Slavery and Child Exploitation Team** 020 7587 3546 or [traffickingreferralteam@met.pnn.police.uk](mailto:traffickingreferralteam@met.pnn.police.uk)

These officers investigate alleged crimes of modern slavery and exploitation.



**Modern Slavery Helpline (Unseen) 08000 121 700**

The Modern Slavery helpline are a First Responder Organisation and can provide extensive expertise in risk assessing and planning support.



**Salvation Army Modern Slavery and Trafficking Referral Line** 0800 808 3733 is available 24/7 (adults)

The Salvation Army provides specialist support for survivors of modern slavery who have been referred into the NRM. They provide housing where necessary, advocacy, and practical support. This includes victims who have No Recourse to Public Funds



**Hillingdon Stronger Families Hub** 01895 556006

**Hillingdon Adult Social Care** 01895 556633 or [socialcaredirect@hillingsdon.gov.uk](mailto:socialcaredirect@hillingsdon.gov.uk)

**Axis Service** [axis@hillingsdon.gov.uk](mailto:axis@hillingsdon.gov.uk)