

# ADULT MODERN SLAVERY PROTOCOL FOR LOCAL AUTHORITIES



How to identify a victim of human trafficking or modern slavery

**Definitions and Indicators**

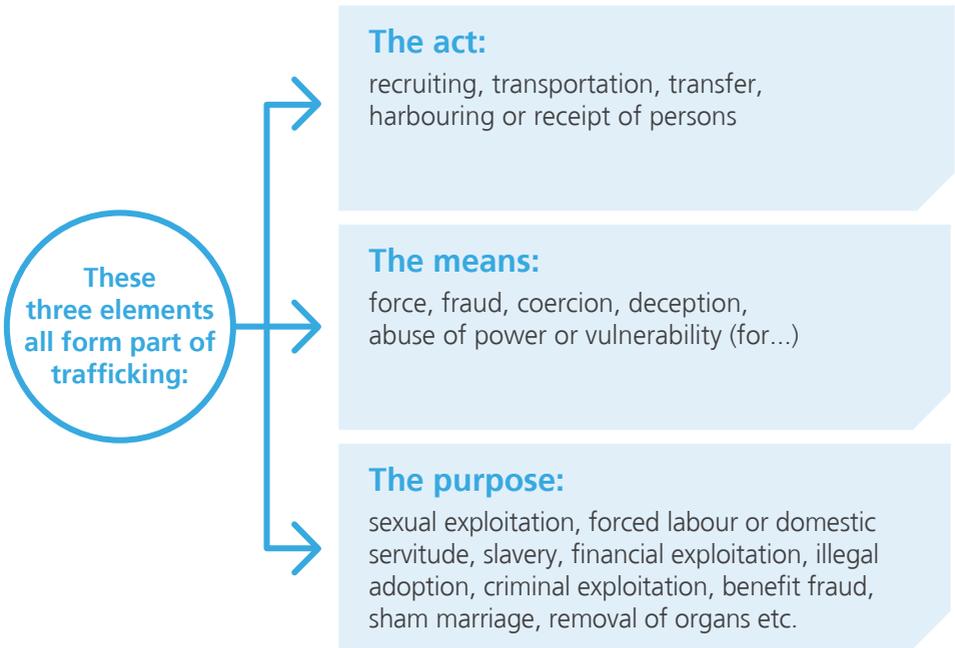
*“Modern slavery is a serious and brutal crime in which people are treated as commodities and exploited for criminal gain. The true extent of modern slavery in the UK, and indeed globally, is unknown.”<sup>1</sup>*

# WHAT IS HUMAN TRAFFICKING?

Human trafficking is the movement of a person from one place to another for the purposes of exploitation. The UN defined human trafficking in the 'Palermo Protocol' as the 'recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, or use of force, coercion or deception...to achieve the consent of a person having control over another person, for the purpose of exploitation' (UN, 2000, Art. 3). According to this definition, trafficking includes sexual exploitation, forced and bonded labour, domestic servitude, any form of slavery and removal of organs. The definition of exploitation is not limited.

## DEFINITION FORMULA

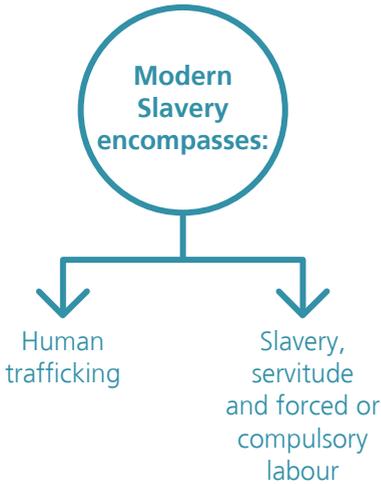
### HUMAN TRAFFICKING = ACT + MEANS + PURPOSE



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

# THE MODERN SLAVERY ACT 2015 AND THE TERM MODERN SLAVERY

Modern Slavery legislation originates from the Modern Slavery Act 2015 (MSA). The MSA is designed to make provisions about the offences of slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims. It also details the statutory defences available to victims that have been forced to commit various crimes. The Act also states that a person commits an offence if they arrange or facilitate the travel of another person in order to exploit them. It is irrelevant whether the exploited person, adult or child, consents to the travel.



*“Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.”*

HM Government

These crimes include holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.<sup>2</sup> The Modern Slavery Act consolidated trafficking offences into one place.

## MODERN SLAVERY = MEANS + PURPOSE

It does not necessarily include the ‘Act’ element of the human trafficking process.

**In practice, the terms modern slavery and human trafficking are often used interchangeably and a potential victim (PV)<sup>3</sup> will refer to a PV of human trafficking or slavery in this document.**

<sup>2</sup> National Crime Agency, <http://www.nationalcrimeagency.gov.uk/crime-threats/human-trafficking>  
<sup>3</sup> We respect the dignity of all victims of slavery and human trafficking and recognise that each survivor is an individual who requires humanity and a response tailored to their individual needs. However for the sake of brevity we will use the shorthand PV in reference to this cohort.

# 'MEANS' - TYPES OF COERCION AND CONTROL

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

**Note that coercion does not need to include violence or the threat of violence.**

- The threat or use of force (physical restraint, beating, rape, abuse against them or family members etc.)
- Withholding travel or immigration documentation
- Ritual oaths or use of fear based on a belief system (for example - use of Juju<sup>4</sup>).
- Fraud - control of a PV's accounts or finances, attaching their name to debts, cars, illegal activity etc.
- Abduction
- Blackmail or intimidation
- The abuse of power or of a position of vulnerability (whether physical, psychological, emotional, family-related, social or economic. E.g. Illegality of the PV's immigration status, economic dependence or fragile health.) A situation in which the person concerned has no real or acceptable alternative but to submit to the abuse involved.

<sup>2</sup> A spiritual belief system incorporating spells used in religious practice, as part of witchcraft in West Africa – used incorrectly as a form of control to reinforce contractual obligations in some human trafficking cases involving West African PVs which binds them to their trafficker, with fear of being struck down or their families dying etc., if they disobey.

- > Debt bondage or peonage and depriving the individual of money - creating artificially high debts for travel or forcing someone to pay an excessive amount of money for substandard accommodation or making significant deductions from an individual's 'salary'.
- > Deception e.g. employer provided false/inaccurate information about the employment, wages or working conditions etc.
- > 'Stockholm syndrome' – where, due to unequal power, victims develop a false emotional or psychological attachment to their controller or may identify with the perpetrator as a survival or coping mechanism.
- > Grooming – where vulnerable individuals are enticed over time to take part in activity in which they may not be entirely willing participants (e.g. the 'lover boy' method is common in sexual exploitation).
- > Physical confinement or restriction of movement. Or confinement through threats/control. Unable to leave with no money, nowhere to go and no one to turn to. Also fear of consequences.
- > Threat or the perceived threat to the PV's relationships with other family members or peer group.
- > Social stigma (for example, using shame towards someone for working as a sex worker, or shaming them for losing control/failing to find suitable work.)

# 'PURPOSE' - TYPES OF EXPLOITATION

## TYPES OF EXPLOITATION INCLUDE THE BELOW:

Please note however due to the crime's changing nature, this list is not exhaustive. Also PVs are likely to be exploited in multiple types of slavery.



### **Sexual exploitation:**

Many PVs have been forced, coerced or deceived into this work, whilst others may have come willingly to work in this field but have been deceived about the nature or conditions of work on their arrival. Possibly with little or no pay, they will often be deprived of their freedom of movement and kept subjugated through the use of physical and/or psychological coercion such as bullying, threats to them or family members, debt bondage and violence.

Forms of sexual exploitation include organised prostitution in brothels or on the street, or in more informal networks among the exploiter's friends, associates or family. Forms can also include being exploited in pornography and lap dancing. In some cases forced marriage can lead to trafficking for sexual exploitation.



### **Labour exploitation and bonded labour:**

Labour is the provision of any service, not just manual labour. The ILO states that, "*All work or service which is exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily*" – the menace or penalty can be the confiscation of passports, non-payment of wages, placing a person in a situation of dependency, threats or risk of homelessness.

In most cases, PVs are coerced to carry out work on, for example, farms, factories, restaurants, nail bars, car washes or construction sites, or laying driveways, for little or no pay. If they are foreign nationals, their passports are often confiscated by their traffickers and they may be made to live in terrible conditions.

If they have a contract, they are unlikely to have a copy or have had an opportunity to read or understand anything they have signed, let alone know any means to enforce any agreed conditions of work which do not materialise.

Often a bond or perceived debt is used to keep the person in subjugation and there can be excessive wage deductions – such as for the cost of accommodation or food or the bonded debt can include costs such as for transport to the UK. Alongside physical or even sexual violence, control can take less obvious forms, such as threats to hurt their families or report victims to police or immigration if their employment status is illegal or is unknown or believed to be illegal.

PVs may also be exploited in other ways including being trafficked or abused for sex and the taboos around this can themselves be used as a form of control. They can be at risk of being subject to physical or sexual violence from other PVs as well.



### **Domestic servitude:**

Domestic servitude involves people working in a household where they are: ill-treated, humiliated, subjected to exhausting working hours, denied privacy and forced to live and work in very poor conditions, for little or no pay. In some cases sexual abuse may take place as well.

The European Court of Human Rights (ECHR) reaffirmed in *Siliadin v France* that the ECHR prohibits a “*particularly serious form of denial of freedom,*” including “*in addition to the obligation to provide certain services for others...the obligation for the “serf” to live on another person’s property and the impossibility of altering his condition.*”<sup>5</sup>

It is often very difficult for domestic slaves or servants to leave their employers and seek help, and if they do they are frequently accused of theft, immigration offences or other relatively minor crimes. Abusive employers create physical and psychological obstacles by, for example, threatening them, or their relatives, with further abuse or deportation, debt owed for travel to the country of work or visa fees, or by withholding their passport. Wages are often withheld on the basis that they will be paid in the future with the aim of keeping the person working in the hope of eventually being paid.

Emotional blackmail is also common, for example saying that they 'are one of the family' and that is why they want them to look after the children with no day off as 'there is no day off from family' and that they cannot leave as the children love them so much. In some cases, a forced marriage can lead to domestic servitude.



### **Criminal exploitation:**

This occurs when a person is coerced to become involved in criminal activities such as selling and moving drugs, cannabis farming, forced begging, pickpocketing, shoplifting, etc. Often victims of slavery end up in the criminal justice system and are treated as criminals instead of being protected as victims of a serious crime. In cases where the exploitation activity is in itself illegal, the risk of this is high.



### **Forced Fraud:**

Traffickers will dishonestly apply for tax credits and other benefits using the PVs' details, sometimes unbeknownst to the PVs themselves. It is also common for PVs' identities to be used for other purposes such as taking out loans, or mobile telephones etc. Using their identities, they can run the PV into debt and use that as another form of control. The person involved may be exploited for other purposes as well. Abuse may be used against the individual in order to coerce them into these arrangements. However in many cases PVs are deceived rather than coerced. The trafficker claims that they will help them fill out benefits forms or crisis loans etc. when in reality they have no intention of allowing them to access these funds. Alternatively they may simply have been asked to sign documents which they could not read or understand.



### **Forced marriage, 'sham marriage' and surrogate mothers:**

**Forced marriage** - where one or both people do not (or in cases of people with learning disabilities, are unable to) consent to the marriage, and pressure or abuse is used. This can be coupled with other forms of slavery and can be used to exploit individuals in various ways. Children or adults who are trafficked for sex may also then be sold into forced marriages. An adult who is forcibly married may then be trafficked for labour or sex by, and for the financial gain of, his or her spouse.

**Surrogate mothers** - Women may be forced to act as surrogates and made to give birth to children that are then taken away from them.

**Sham marriages** - There are also cases where marriages of British and European citizens may occur to procure regular immigration status for non-EU citizens, as a benefit that someone may receive that is not necessarily sexual or economic, though it is sometimes a combination. There is usually no subsisting relationship, dependency, or intent to live as husband and wife or as civil partners. The PV may be approached because they are in a position of vulnerability – possibly already being trafficked for other services and/or in debt bondage. Or the sham marriage may lead to further exploitation. They may be unaware that this form of marriage is a criminal offence. They may only be identified due to the ‘sham’ marriage being unveiled or due to domestic violence being uncovered, and are unlikely to self-identify as a victim of exploitation and trafficking.



### **Organ harvesting:**

This type of trafficking involves trafficking people for the purpose of using their organs, tissue and cells, in particular, kidneys. Trafficking in organs occurs in various forms. Traffickers might force or deceive the victims into giving up an organ. Or victims formally or informally agree to sell an organ and are cheated because they are not paid for the organ or are paid less than the promised price. Alternatively, vulnerable persons are treated for an ailment, which may or may not exist and thereupon organs are removed without the victim’s knowledge. Or a person can be tricked via the psychological control of traffickers so that the victim appears to consent. For example a person may be coerced to marry someone who requires an organ transplant, hence why the marriage took place. Organs may also be taken during illegal ritual practices.

# POINTS OF NOTE



## CONSENT IS IRRELEVANT TO EXPLOITATION

The Home Office circular guidance states that: *“An individual’s consent to the conduct alleged to amount to slavery, servitude or forced or compulsory labour does not prevent the offence being committed.”*<sup>6</sup>

As confirmed by the Palermo Protocol, the consent of a person to any intended exploitation is irrelevant where any of the means set out within the protocol have been used.



## EXPLOITATION NEED NOT HAVE TAKEN PLACE YET TO CONSTITUTE SLAVERY/HUMAN TRAFFICKING

The Home Office frontline staff guidance states that: *“Under the Convention, a person is a ‘victim’ even if they haven’t been exploited yet, for example because a police raid takes place before the exploitation happens... So, it is the purpose which is key, rather than whether or not exploitation has actually occurred.*

*Even if the UK authorities intervene and prevent exploitation taking place in the UK, victims may have experienced serious trauma in their home country or on the way to the UK and may still be in need of support.”*<sup>7</sup>



## THE CRIME OF SLAVERY OR TRAFFICKING OVERRIDES ANY IRREGULAR IMMIGRATION OR OTHER MINOR OFFENCES

Karen Bradley, former Minister with the Slavery Portfolio: *“The intent of the offence of illegal working is clear; it is not aimed at the victims of modern slavery. Anyone who is a victim of modern slavery can at any time report their captors...”*<sup>8</sup>

The person exploiting an individual should be the focus of the primary law enforcement effort, while PVs should be treated as victims rather than perpetrators of crime or as irregular migrants. An accusation of theft or irregular migration should not take precedence. Rather there should be a presumption of non-criminalisation for offences arising in connection with a victim’s experience of trafficking.

<sup>6</sup> S.1(5) and s.2(2) MSA 2015

<sup>7</sup> <http://www.antislaverycommissioner.co.uk/media/1057/victims-of-modern-slavery-frontline-staff-guidance-v3.pdf>

<sup>8</sup> <https://iasservices.org.uk/governments-immigration-bill-criticised-by-anti-slavery-campaigners/>



## VICTIMS OF SLAVERY AND TRAFFICKING OFTEN DO NOT FIT A STEREOTYPE

PVs can come from a variety of backgrounds including being well-educated and from wealthy families.

Adult men and boys can be victims of trafficking in similar types of exploitation to women and girls, and many victims of slavery come from the UK as well as abroad. Victims may be subjected to different forms of exploitation and at different times. Traffickers may also not fit an expected profile and may be very educated and appear to be outwardly respectable and likeable people.



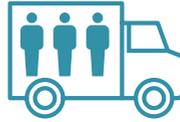
## PEOPLE RARELY SELF-IDENTIFY AS VICTIMS OF TRAFFICKING/SLAVERY OR EASILY REVEAL THEIR EXPERIENCES

The Home Office frontline staff guidance states that, *“The way in which different people describe their experiences means you must not rely on victims to self-identify in explicit or obvious ways.”* It is for frontline staff to know the indicators and ask the right questions to determine if a person is a potential victim of slavery.

Not only may PVs be unlikely to self-identify as a victim of human trafficking/slavery but they may also be unwilling to disclose their experiences to statutory authorities for fear of reprisals from their exploiters; or they may fear the UK authorities if they have had bad experiences with government agencies, who may be corrupt, in their own country. They may be ashamed at the way they have been treated and how the ‘great opportunity’ they were offered to come to the UK failed to materialise. They may also be unfamiliar with the concepts of trafficking or modern slavery and have normalised their treatment to the extent that they do not see that it would be relevant or of interest to disclose it.

Other reasons may be that they are in a situation of dependency, fear, stigma, have Stockholm syndrome, are unwilling to see themselves as ‘victims’ or blame themselves, or see their current situation as temporary and tolerate it because they see it as a ‘stepping stone’ to a better future. PVs may be unwilling to speak of abuse which they consider to be shameful or a taboo and exploiters may have played on this saying the abuse is the PV’s fault. PVs may have also emotionally blocked or buried memories of abuse in order to function and self-protect and so may not be able to disclose aspects of their treatment for some time and without substantial support.

In these situations you must consider objective indicators such as the seizure of their documents or use of threats by the employer to identify if the person could be a victim of slavery. Also look objectively at who is in front of you – their demeanour: do they look scared, are there any signs of physical abuse, note their clothing, hygiene etc.? You can also ask to see indicators of decent employment such as evidence of regular payment, payslips, an individual leaving the workplace and knowing the surrounding area, having friends and acquaintances outside of the workplace (asking if neighbours ever saw them?) and having time off.



## SMUGGLING IS NOT TRAFFICKING

Frontline staff must avoid confusing human trafficking with human smuggling. In smuggling cases, asylum seekers and immigrants pay people to help them enter the country irregularly. This is a crime against the state rather than a crime against an individual. Smugglers are providing an (illegal) service rather than treating a person as a commodity. It is also short-term rather long-term with a one-off payment rather than ongoing appropriation.

However it is important to note that trafficking victims may start out believing that they are being smuggled, and will be free on arrival but may have experienced abuse as part of that journey or end up in a potentially exploitative situation, where they are forced to work to pay off their 'debts', which may be increased over time to retain control over them.

It is also important to understand this distinction and be clear about definitions because if a first responder uses the term 'smuggling' while filling out an NRM form for a victim of trafficking this could wrongly be used to discount the claim of trafficking.



## NOT ALL MIGRANTS WORKING ILLEGALLY ARE TRAFFICKED

While not all PVs will identify as victims of trafficking it is important to also recognise that not all migrants working in the UK, for example, for less than the minimum wage or in an illegal activity have been trafficked. Intelligence that there are simply foreign workers working in a brothel or a nail bar is not adequate evidence to signify human trafficking or warrant a human trafficking response.

Also note that some traffickers ensure the people they are exploiting work on legitimate visas, or in the case of EEA nationals are entitled to work, and so legitimacy in this sense does not mean exploitation is not taking place.

# APPROACH FOR PRACTITIONERS TOWARDS POTENTIAL VICTIMS OF MODERN SLAVERY



## **SAFEGUARDING APPROACH:**

Make every contact count.



## **HUMAN RIGHTS APPROACH:**

Modern Slavery and Human Trafficking are human rights violations and all actions for victims should aim to restore those rights. Recognise that local authorities do provide services for those who fall outside other services in order to comply with international obligations such as the Human Rights Act.



## **TRAUMA INFORMED APPROACH:**

Move away from a punitive approach to a trauma-informed and victim-centred safeguarding response. Tackle the culture of disbelief focused on immigration issues and/or criminal justice issues.



## **LONG-TERM APPROACH:**

Understand that identification is the beginning of the process of protecting and safeguarding not the end. There is often a short-term focus, often on the immediate safety plans, that fails to look at the longer-term risk of going missing or being re-trafficked or re-exploited. There should be planning for the potential victim's rehabilitation and access to justice through compensation claims etc.

# ADULT SLAVERY INDICATORS

Indicators signpost to concerns that should always lead to further investigation and consideration of an NRM referral. They may not necessarily be considered as evidence of trafficking or slavery but should lead to further work to gather more evidence as they may act as evidence that the person is at risk of exploitation if they are not supported to prevent this. A person may have also been abused before they became a victim of slavery or human trafficking

## Frontline safeguarding staff are not expected to:

- Be able to prove human trafficking. If trafficking is suspected, but not conclusively proven, the individual should still be identified as a potential victim. This initial threshold is deliberately low in order to encourage referrals where there are any concerns.
- Evaluate indicators to a criminal standard of proof. The standard of proof for identifying a victim is much lower than the criminal standard of proof.

## CONVERSATION



- Fearful, anxious and withdrawn
- Unable to speak local language
- Refuses or reluctant to talk to a person in authority or provide personal details
- Does not recognise themselves as having been trafficked or enslaved
- Tells their stories with obvious errors
- Has a prepared story, very similar to those that other adults have given
- Is unable or unwilling to give the name and address of the employer

## BEHAVIOUR/APPEARANCE



- Appears to be missing for periods
- Is known to beg for money
- Having tattoos or other marks indicating 'ownership' by their exploiters
- Victims may experience post-traumatic stress disorder, which can result in the following symptoms: hostility, aggression, difficulty in recalling details or entire episodes, difficulty concentrating

## WORK



- Wearing unsuitable clothing i.e. flip flops in winter; no helmet on a construction site
- Is required to earn a minimum amount of money every day
- Poor health & safety equipment, no health & safety notices and unhygienic, unsafe working conditions
- Excessive working hours, no days off and little spare time to get lunch etc.
- (Perception of) debt bondage
- No or limited access to earnings or labour contract
- Excessive wage reductions or financial penalties
- Movement of individuals between sites or working in alternate locations

## FREEDOM OF MOVEMENT



- Is accompanied by a person who insists on remaining with them at all times
- Limited freedom of movement
- Limited or no social interaction and poorly integrated into the community
- Dependence on employer for a number of services - for example work, transport and accommodation
- Limited contact with family
- Never leaving the house without permission from an employer
- Only leaving the house as a group

## HEALTH



- Shows signs of physical or sexual abuse and/or has contracted STIs or has an unwanted pregnancy
- Has not been registered with or attended a GP practice
- Appears to services (doctor/council) only in the final months of a pregnancy
- Bruises, cigarette burns and untreated injuries
- Broken bones that haven't healed properly
- Malnourished
- Learning difficulties or drug/alcohol dependent
- Dental problems and poor hygiene
- Neurological symptoms, headaches, dizzy spells, memory loss
- Gastrointestinal symptoms (symptoms relating to the stomach or intestines)
- Musculoskeletal symptoms (symptoms relating to the bones or muscles)
- Work related injuries often through poor health and safety measures
- Signs of mental health issues e.g. trauma, PTSD, panic attacks etc.

## ACCOMMODATION



- Workers are required to pay for food or accommodation via deductions from pay
- Home delivery meal packaging
- Crammed/rough sleeping conditions inc. 'beds in sheds'
- Cars or minibuses picking up at unusual times
- Not eating with the rest of the family and no private sleeping place or sleeping in a shared space
- Frequent visitors to residential premises
- Lack of family photos and personal belongings,
- Post stacked up and discarded envelopes on floor
- A script by a telephone on making benefits claims
- Unable to show any autonomy over accommodation e.g. no tenancy, bills, or other paper trail including bank account in their own name

## JOURNEY



- May have entered the country irregularly or their visa has run out (note that they may be from the UK or be a foreign national with legal status to be in the UK)
- Travel in a group, often with people who do not speak the same language
- May have had their journey (or visa) arranged by someone other than themselves
- Has to pay off exorbitant debt e.g. for travel costs, before having control over own earnings/documents

## EMPLOYER



- Employer reports them as a missing person
- Employer accuses person of theft or other crimes related to their escape
- Employer speaking on their behalf
- Employer unable to produce documents required when employing migrant labour
- Difficult to establish/prove relationship between adult and child(ren)
- Single adult is contact for a large number of children / families / workers

## DOCUMENTS/IMMIGRATION



- Has no passport or other means of identification
- Has false travel/identity documentation
- Is unable to confirm names and addresses of employer / contacts / home / workplace in UK
- Does not appear to have money but does have a mobile phone
- Is in possession of money and goods which are not accounted for
- Coerced to apply for asylum or warned not to apply for asylum
- Fear of revealing immigration status or lacks knowledge on current immigration status

# DRIVERS

There are a variety of complex factors that can render individuals/communities vulnerable to slavery. They can either be pre-existing factors, such as poverty, addictions, mental health, previous criminal convictions, gender, or factors created by the exploiter such as their immigration status, employment status or isolation. Drivers might include any or several or none of the following:

**Poverty or lack of economic opportunity**

**Illness and disability**

**Language barriers and lack of knowledge or access to rights**

**Inequality and discrimination**

**Mental health or learning disabilities**

**Fleeing domestic violence or other abuse**

**Emotional or familial or romantic relationships**

**Religious and cultural beliefs**

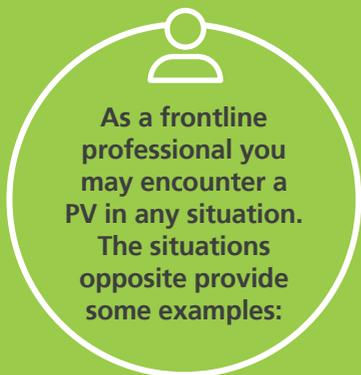
**Lack of legal/immigration status**

**Homelessness**

**Substance misuse issues**

**Gender-related issues – escaping FGM, forced marriage etc.**

# 'BUSINESS AS USUAL'



- Sexual offences, grooming, prostitution, forced marriage
- Anti-social behavior
- Planning breaches
- Multiple occupancy / Over-crowded dwellings
- Minimum wage / pay disputes
- Homelessness
- Vulnerability within a domestic setting / a 'domestic abuse' case
- Persistent missing persons
- Irregular immigration / immigration offences
- County lines, gangs, drug selling / cultivation
- Benefit fraud and sham marriages
- Illegal licensing

## CASE EXAMPLE:

A situation where an Eastern European woman was beaten by her husband was handled and recorded as a case of domestic violence. Once in a refuge, several months later, the woman revealed she didn't know her husband's ethnicity. It became clear that she had been forcibly trafficked into a marriage. In light of the statutory duties in the Modern Slavery Act, the local authority/police should have identified this as a modern slavery case and notified the Competent Authority.

All those working in a local authority, whether in a housing or licensing team or in safeguarding, have a statutory duty to be able to identify trafficking or slavery in these cases and then report it.

# GLOSSARY OF TERMS

This protocol and pathway guidance is made available for education and general information purposes only to help improve understanding on identifying and supporting potential victims of modern slavery and human trafficking.

**CA - Competent Authority**

To be referred to the NRM, potential victims of trafficking or modern slavery must first be referred to one of the UK's two competent authorities (CAs) - the Modern Slavery Human Trafficking Unit (MSHTU) and the UK Visa Immigration department (UKVI).

**CG - Conclusive grounds**

During the 45 day reflection and recovery period the Competent Authority gathers further information relating to the referral from the first responder and other agencies, before making a positive or negative CG decision.

**DL(R) - Discretionary Leave to Remain:**

DL is granted outside the Immigration Rules. It must not be granted where a person qualifies for asylum or humanitarian protection (HP) but is intended to cover exceptional and compassionate circumstances. While a grant of 30 months' leave is generally appropriate, leave may be granted for shorter or longer periods, including, in particularly compelling circumstances, indefinite leave to remain.

**ECAT**

Council of Europe's Anti-trafficking Convention.

**EEA nationals**

The EEA includes EU countries and Iceland. EEA nationals do not have the no recourse to public funds condition imposed on them. However they may be prevented from claiming welfare benefits, homelessness assistance or getting a housing allocation from the council when they do not meet the eligibility criteria for these services – these can be difficult to establish, particularly if the person has been trafficked.

**ECHR**

The European Convention on Human Rights Used in a case against Bristol Council to demonstrate that they should have provided a women who had been trafficked, with support.

**FR - First responder**

First Responders are responsible for identifying and interviewing potential victims of human trafficking. All those working in local authorities, alongside Police, UK Border Force, Gangmasters Labour Abuse Authority and several NGOs, including the Salvation Army, are first responders.

**GLAA**

The Gangmasters and Labour Abuse Authority Non Departmental Public Body (NDPB) who prevent worker exploitation and tackle unlicensed and criminal activity.

**HT - Human Trafficking**

The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

**LA**

Local authority

**MASH - Multi-Agency Safeguarding Hub (MASH)**

Involves the police, Local Authorities and other agencies who work together to protect children, young people, and in some cases adults from harm.

**MARAC - multi-agency risk assessment conference**

Is a meeting where information is shared between representatives of local police, probation, health, child protection, housing practitioners, usually on high risk domestic abuse cases, sometimes on other safeguarding issues such as human trafficking.

**MS - Modern slavery**

Encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment. A large number of active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators.

**MS1 Form**

If a potential victim has not consented to enter the NRM, you must send an 'MS1: notification of a potential victim of modern slavery form' to the Home Office instead of an NRM referral form.

**NCA - National Crime Agency**

The National Crime Agency (NCA) is a national law enforcement agency.

**NRM - National Referral Mechanism**

Is a framework for identifying victims of human trafficking and ensuring they receive the appropriate protection and support.

**PV**

Potential victims of modern slavery or human trafficking.

**NRPF – No recourse to public funds**

A person with no recourse to public funds (NRPF) is only prohibited from accessing public funds, which are limited to certain welfare benefits and social housing. They are still possibly entitled to support under other EU, Council of Europe and UK legislation.

**RG– Reasonable Grounds**

The NRM team has a target date of 5 working days from receipt of referral in which to decide whether there are reasonable grounds to believe the individual is a potential victim of human trafficking or modern slavery.

**SPoC**

Modern slavery single point of contact - Allocated point of contact for cases of slavery and human trafficking, based in a local authority, police borough force or in the NHS.

**TSA**

The Salvation Army run the Government’s safe house provision for potential victims.

**VRS – Voluntary Return Service**

The Home Office provide a paid voluntary return service package for foreign national survivors wanting to return to their homeland.

Written by the Human Trafficking Foundation and Anti-Slavery London Working Group (LWG) contributors: Africans Unite Against Child Abuse (AFRUCA), Aire Centre, Anti Trafficking and Labour Exploitation Unit (ATLEU), Anti-Trafficking Monitoring Group (ATMG), Caritas Bakhita House, Croydon Community Against Trafficking (CCAT), City Gateway (Women’s Programme), Every Child Protected Against Trafficking (ECPAT UK), Eastern European Resource Centre (EERC), Ella’s Home, Focus on Labour Exploitation (FLEX), Gangmasters and Labour Abuse Authority (GLAA), Housing for Women, The Helen Bamber Foundation, Hestia, Hope for Justice, International Organisation for Migration (IOM), Kalayaan, Latin American Women’s Rights Service (LAWRS), Love146, Migrant Legal Action, The Mayor’s Office for Policing and Crime (MOPAC), The Metropolitan Police Service’s Modern Slavery and Kidnap Unit (SCO7), NHS England, National Ugly Mugs (NUM), Olallo House (St John of God Hospitaller Services), Refugee and Migrant Forum of Essex and London (RAMFEL), The Rape & Sexual Abuse Support Centre (RASASC), British Red Cross, Shpresa Programme, Sophie Hayes Foundation, St Giles Trust, St Mungo’s Homeless Charity, The Children’s Society, The Salvation Army (TSA), Victim Support, and Snowdrop Project.



**ATLEU**  
ANTI TRAFFICKING AND  
LABOUR EXPLOITATION UNIT

**BritishRedCross**



**LOVE146**  
END CHILD TRAFFICKING AND EXPLOITATION

**MOPAC**

MAYOR OF LONDON  
OFFICE FOR POLICING AND CRIME



**NHS**  
England



olallo services

**iramfel**  
Refugee and Migrant Forum of Essex & London



**St Giles Trust**

**St Mungo's**  
Ending homelessness  
Rebuilding lives



**The AIRE Centre**  
Advice on Individual Rights in Europe

**The Anti Trafficking  
Monitoring Group**

**The Children's  
Society** No child  
should feel  
alone





