

Key Steps for front line staff when identifying a potential victim of modern slavery/human trafficking

This document is to provide basic summarised guidance to staff in Gloucestershire when faced with a potential victim of slavery/trafficking.

First Responder identifies potential victim of Modern Slavery

NOTE: *First Responder = Police, Health, Local Authority, Fire & others see APP Modern Slavery for full list)*

If First Responder is not a Police Officer– call police at this point if there is an **ongoing incident** – i.e. violence or threat of violence, or potential victims being moved on

Arrange emergency medical treatment & respond to any urgent criminal activity

Possible Indicators:

- Physical appearance
- Isolation
- Poor living conditions
- Few or no personal possessions
- Restricted freedom of movement
- Unusual travel times
- Reluctance to seek help

Additional Guidance Links Below:

- [Modern Slavery - HO Front Line Guidance](#)
- [The Modern Slavery Helpline](#)
- Or call 08000 121 700 for advice and information
- [APP - Modern Slavery](#)

Refer potential victim to the **National Referral Mechanism** or complete 'Duty to Notify':

[NRM Referral Forms](#)

- NRM is a framework for identifying victims & ensuring they receive appropriate support – it is also the mechanism through which the NCA collate data about victims
- There are separate forms for adults and children
- Adults must give signed consent to be referred and further consent to receive funded support if required
- No consent is needed for children

Non Police First Responder:

You must follow the instructions on the form and send it to:

nrm@nca.x.gsi.gov.uk

NOTE: *The link may say the form should be sent to the Slavery Safeguarding Lead – this was a trial and has now ceased. An updated form is awaited. Send to the address above.*

- Modern Slavery is a crime and should be reported.
- Completion of the NRM form should provide enough detail to report the crime at this point.
- This can be done by calling 101 (999 in an ongoing incident or emergency). Or via the Gloucestershire Police Website:

[Gloucestershire Police](#)

Police Officer First Responder:

- Ensure an incident is created
- Crime the appropriate Modern Slavery offence
- Make your Supervisor aware
- Liaise with Duty CID Supervisor
- Complete the NRM form
- [NRM Referral Forms](#)
- Forward the completed NRM form to the CID Supervisors inbox:
cidsupervisors@gloucestershire.pnn.police.uk

CID Supervisor:

Ensure form is fully completed as far as possible and crime created – liaise directly with the officer

Forward the form to the NRM:
nrm@nca.x.gsi.gov.uk

Copying in the PPB Analyst:
Victoriaminettwilliams@gloucestershire.pnn.police.uk

Process after NRM referral:

The MSHTU of the NCA will make a 'Reasonable Grounds' decision within 5 days.

If agreed they have a minimum of 45 days to make a 'Conclusive Grounds' decision.

Those with Conclusive Grounds decisions may be eligible for discretionary 'Leave to Remain' in the country and a statutory defence exists for the commission of certain offences while a victim of slavery.

NOTE:

For child victims a referral **MUST** be made to the Central Referral Unit:
cruenquires@gloucestershire.pnn.police.uk

Accommodation & Support for Children

Requests for support must always be made to the local authority children's services – see CRU contact. If out of hours contact must be made with EDT (Emergency Duty Team, Social Care) – 01452 614194

Accommodation & Support for consenting Adults

If an adult victim indicates they require support or safe accommodation *and* consent to entering the NRM process you must contact the Salvation Army's 24 hour referral line on **0300 3038151**. The Salvation Army are centrally contracted to provide this service. Arranging accommodation may be done either:

- From the day of referral to the NRM where the individual is destitute, or
- From the day the competent authority makes a positive reasonable grounds decision in other cases (this should be within 5 days)

When the potential victim is an adult and consent is not forthcoming:

Potential Victims are not obliged to enter into the NRM or receive the appropriate support. In which case, there is still a 'Duty to Notify' the Home Office set out in the Modern Slavery Act. First Responders should use the [MS1 form](#) for this process. When completed and returned to the Home Office, the form should be copied to Gloucestershire Police to improve county awareness and intelligence collection (PPB Analyst - Victoriaminettwilliams@gloucestershire.pnn.police.uk).

The MS1 (Duty to Notify) form does not need to be completed if an NRM form has been submitted.

Even if the potential victim does not wish to consent, appropriate safeguarding measures need to be considered as a priority, as well as recording a crime where relevant.