



Home Office

Identification of Victims of Modern Slavery: Call for Evidence

Government Call for Evidence

This Call for Evidence begins on 16 July 2025

This Call for Evidence ends on 8 October 2025

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Introduction

The Government is committed to reforming the UK's system for identifying victims of modern slavery. Our vision is that, over the next five years, the UK has a more effective approach to identifying victims of modern slavery, where victims are recognised early and accurately so they can be protected and provided with appropriate assistance and support towards their recovery from exploitation. Through this Call for Evidence, the Government is interested in hearing from a wide range of different groups about ways to achieve this vision.

Background

Terminology

We recognise there are different preferred terms for describing those who have been exploited in modern slavery, with terms including ‘victim’, ‘survivor’ and ‘person with lived experience’ being used. This Call for Evidence uses the term ‘victim’ in many places given this is the term used in relevant legislation, such as the Modern Slavery Act 2015.

What is modern slavery?

Modern slavery is an umbrella term which encompasses slavery, servitude and forced and compulsory labour, and human trafficking for the purposes of exploitation. Exploitation can manifest in different ways, including sexual exploitation, forced labour, criminal exploitation and domestic servitude.¹ Modern slavery in the UK affects women, men and children and British and foreign nationals.²

What is the purpose of identifying victims of modern slavery?

Effective identification of victims of modern slavery in the UK is critical for ensuring that victims can be protected and provided with appropriate assistance and support towards their recovery from exploitation. In addition to enabling access to protections and support, an effective identification system supports other Government priorities, for example:

- Early identification of victims and provision of support **prevents the harms and social and economic costs**³ associated with ongoing exploitation or re-trafficking.
- While the victim identification process is separate from criminal investigation into modern slavery, effective identification can lead to victims feeling supported to **engage in criminal justice processes** against their traffickers and exploiters.
- Early and accurate identification of victims of criminal exploitation, including children, can **reduce the risk of criminalisation** of those forced to commit crimes as part of their exploitation.

¹ For more information on the typology of modern slavery offences, see [A typology of modern slavery offences in the UK - GOV.UK](#)

² Home Office (2025) *Modern slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2024*, published 6 March 2025. Available at: <https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-end-of-year-summary-2024/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2024>

³ Home Office (2018) *The economic and social costs of modern slavery*, published July 2018. Available at: <https://assets.publishing.service.gov.uk/media/5b59d143ed915d0b92a4f53e/economic-and-social-costs-of-modern-slavery-horr100.pdf>

- The existence of a formal identification process provides **data and insights about the scale and nature** of people affected by modern slavery in the UK, which informs prevention efforts.

What is the National Referral Mechanism?

The National Referral Mechanism (NRM) is the framework currently used in the UK to formally identify victims of modern slavery and human trafficking, in line with the UK's legal obligations.⁴ Under the current system, designated First Responder Organisations⁵, including the police, Non-Governmental Organisations (NGOs), local authorities and parts of the Home Office, refer people who they suspect to be victims of modern slavery to the NRM. Adults (aged 18 or above) must consent to being referred to the NRM, whilst children aged 17 and under need not consent to being referred. Adults who were exploited as children can also be referred. As specified in section 52 of the Modern Slavery Act 2015, public authorities in England and Wales have a statutory duty to notify the Home Office when they come across potential victims of modern slavery. This duty is discharged by either referring a child or consenting adult potential victim into the NRM, or by notifying the Home Office via the Duty to Notify (DtN) process if an adult victim does not consent to enter the NRM.

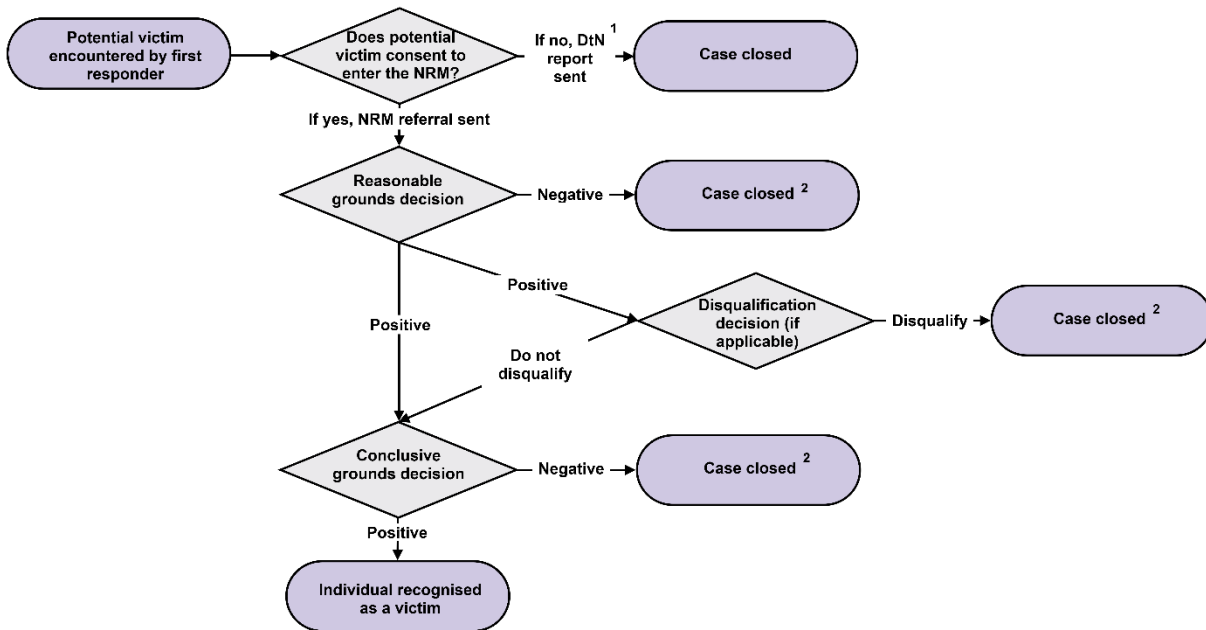
Following referral, competent authorities in the Home Office (the Single Competent Authority and the Immigration Enforcement Competent Authority) assess each referral to determine if someone is a victim of modern slavery. A Reasonable Grounds (RG) decision is made first to identify whether the individual is a potential victim, followed by a Conclusive Grounds (CG) decision to confirm whether the individual is a victim. In some situations, a request for a reconsideration of a negative RG or CG decision can be made. The period between the RG and CG decisions- often referred to as the reflection and recovery period – offers protection from removal from the UK and access to a range of support entitlements. However, this period may not apply in cases where a Public Order or Bad Faith Disqualification is made, as set out under Section 63 of the Nationality and Borders Act 2022. For further information, please refer to the Glossary and Statutory Guidance.⁶

⁴ The UK gives effect to obligations on modern slavery under The Council of Europe Convention on Action against Trafficking in Human Beings (ECAT) and Article 4 of the European Convention on Human Rights (ECHR) through the Modern Slavery Act 2015 and the Nationality and Borders Act 2022.

⁵ For a list of currently designated First Responder Organisations, see <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>

⁶ Home Office (2025) *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*, published 2 June 2025. Available at: <https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims/modern-slavery-statutory-guidance-for-england-and-wales-under-s49-of-the-modern-slavery-act-2015-and-non-statutory-guidance-for-scotland-and-northe#bookmark19>

Figure 1: Modern Slavery Victim Identification Flowchart (simplified)



1. The DtN is only open to adults in England and Wales (as opposed to the NRM which covers the UK). Consent is not needed for children to enter the NRM.
2. Individuals can request that a negative decision is reconsidered (on grounds set out in the Modern Slavery Statutory Guidance). If a reconsideration request is accepted, the matter will be reopened.
3. Some cases may not follow this flowchart. For instance, some may be suspended and others may be devolved pilot cases which can receive combined reasonable and conclusive grounds decisions.

What are the challenges within the current system for identifying victims of modern slavery?

In 2024, 19,125 potential victims of modern slavery were referred to the NRM but NGO estimates suggest that the total number of victims in the UK could be significantly higher.⁷ There are many potential reasons for this gap including the hidden nature of modern slavery, that people may not identify themselves as victims and that professionals may not encounter victims nor identify people who they do encounter as victims of modern slavery.

There are increasing numbers of adults identified as potential victims of modern slavery by statutory first responders in England and Wales who do not consent to be referred to the NRM for formal identification and support. In 2024, the Home Office received 5,598 reports

⁷ It is difficult to robustly estimate the prevalence of modern slavery in the UK. Recent estimates by NGOs suggest well over 100,000 individuals in the UK are victims of modern slavery.

of adult potential victims who did not consent to enter the NRM, compared to 4,929 in the previous year. Possible reasons for not consenting include people not identifying themselves as victims of modern slavery and inconsistent understanding of the NRM.

The Government is already taking action to address challenges within the NRM identification system. In response to lengthy decision-making timescales, the Government has committed to eliminating the backlog of cases awaiting CG decision by the end of 2026.⁸ Decision-making times have reduced in the most recent quarter and the backlog is now half the size it was at its peak. In April 2025, the Government updated the NRM referral form for First Responders, to make it easier for First Responders to upload information and to include more trauma-informed language. These changes aim to improve the quality of referrals, better reflect victims' experiences, and support more informed and consistent decision-making.

While progress has been made, the Government recognises the need to do more by designing a clear identification system that is fit for the future.

⁸ Home Office (2024) Modern slavery victims to be supported in fresh measures. GOV.UK. Published 18 October 2024. Available at: <https://www.gov.uk/government/news/modern-slavery-victims-to-be-supported-in-fresh-measures>

Purpose of this Call for Evidence

This Call for Evidence is a key step towards longer-term reforms of the identification system. Through this Call for Evidence, the Government is interested in hearing from a wide range of different groups about ways that the UK can have a more effective identification system for victims of modern slavery, where victims are recognised early and accurately so they can be protected and provided with appropriate assistance and support towards their recovery from exploitation. We are particularly interested in insights about how the identification system could be made more effective in the following ways:

- **Victim-focused:** the identification process is trauma-informed, people are treated with dignity and respect and empowered to engage with the identification process. The specific vulnerabilities of marginalised groups, children and women are considered.
- **Accurate:** all frontline organisations who may encounter potential victims of modern slavery are clear on what different forms of exploitation look like, indicators that someone may be a victim, the action that they must take and maintain a consistent approach to identifying modern slavery.
- **Efficient:** victims are identified as early as possible, to prevent the further harm of ongoing exploitation, and to reduce the risks of criminalisation of those forced to commit crimes as part of their exploitation.
- **Streamlined:** formal identification processes are clear, proportionate and timely, enabling victims to access appropriate protection and support essential to their recovery.
- **Future-proofed:** identification processes are responsive and resilient to possible future changes that could affect its integrity, such as the evolving scale and nature of modern slavery in the UK.

Scope of this Call for Evidence

This Call for Evidence is structured around three themes where the Government has identified a particular need for further evidence and insights:

1. **Definitions of victims of modern slavery:** A clear definition of who qualifies as a victim of modern slavery is essential to ensure accurate and timely identification, enabling access to support and entitlements through the National Referral Mechanism (NRM). This Call for Evidence seeks to gather evidence on the clarity of the current definition which is set out in the Slavery and Human Trafficking (Definition of Victim) Regulations 2022 and Modern Slavery Statutory Guidance. The Call for Evidence also asks questions about the practical application of definitions including the use of indicators of modern slavery.
2. **Initial identification of victims of modern slavery:** The initial identification of potential victims refers to situations where professionals recognise indicators of modern slavery for the first time. Initial identification is a critical step in the UK's modern slavery response, often determining whether individuals are referred into the NRM. This Call for Evidence seeks views on the effectiveness of current identification practices, including the role of First Responder Organisations (FROs), the clarity of referral pathways, and the quality of early interactions between professionals and those showing indicators of exploitation.
3. **Formal identification of victims of modern slavery:** The formal identification process within the NRM, which includes the Reasonable Grounds (RG) and Conclusive Grounds (CG) decisions made by the Home Office competent authorities, plays a vital role in determining victim status. This Call for Evidence seeks insights into the decision-making process – particularly in terms of how the decisions are made and how information is shared to inform decision-making.

Future design of victim support systems such as the next adult victim support contract and the Independent Child Trafficking Guardians service are not in scope of this Call for Evidence, given the prior engagement on these programmes and their ongoing procurement processes.

How to respond to this Call for Evidence

Please submit your response online via <https://www.gov.uk/government/calls-for-evidence/identification-of-victims-of-modern-slavery> by 8 October 2025.

If you have difficulties in accessing the online link, or want to send supporting evidence in response to a specific question, you can email your response to modernslavery.cfe@homeoffice.gov.uk or write to:

Identification of Victims of Modern Slavery Call for Evidence
Modern Slavery Unit
Home Office,
2 Marsham Street,
London SW1P 4DF

You can also use the email address or postal address for any queries on the Call for Evidence.

We are inviting responses from anyone with evidence on the modern slavery identification system in the UK, including but not limited to:

- Victims, Survivors and People with Lived Experience of modern slavery
- Academics and researchers
- Law enforcement
- First Responders to the National Referral Mechanism
- Charities/NGOs
- Local Authorities (in England, Wales, Scotland) or health and social care trusts (in Northern Ireland)
- Lawyers
- International organisations

The above list of respondents is not exhaustive or exclusive, and responses are welcomed from any member of the public with an interest in or views on the subject covered by this Call for Evidence.

Respondents can provide evidence on all or specific questions in this Call for Evidence.

For the purposes of this Call for Evidence, the types of evidence you **should** submit include:

- ideas that are personal or on behalf of an organisation about the identification system
- unpublished research or data analysis within an organisation
- examples of good practice in the UK identification system or
- examples of where the current system could be improved – including domestically or internationally

Please **avoid** submitting:

- external links to **published** research, evidence, or case studies, for example journal articles, statistics, academic papers, and media sources. A review of published sources is being carried out as part of this project, so it would be more beneficial at this stage to receive unpublished information, or new analysis of existing evidence.
- any information that may identify you or another person. This includes information that may directly identify people such as names and addresses. It also includes information that may allow people to be indirectly identified, such as descriptions of where they live or spend their time, what they do for work, their educational and health histories. This is not an exhaustive list; please review your contribution and use your judgement to determine whether it contains identifying information.

In addition to this Call for Evidence, to inform future policy and legislative development, the Home Office Modern Slavery Unit will be holding engagement sessions with key expert groups including: survivors, first responders, law enforcement and prosecution services and devolved administrations. The engagement sessions will explore themes covered in the Call for Evidence and sessions will be delivered both virtually and in person, where possible. Where appropriate, these discussions will be embedded within existing engagement forums such as the Modern Slavery Engagement Forums (MSEFs).

Data protection

The Home Office is the data controller in respect of any information you provide in your answers. We will hold the data you provide for a maximum of 5 years.

The Call for Evidence does not ask for any personal information, such as names, addresses, email addresses and information about organisations respondents belong to. All information provided during the Call for Evidence will be held securely according to the Data Protection Act 2018.

The Privacy Information Notice (PIN) tells you how the Home Office will hold and process the personal information you provide when submitting your response to the Identification of Victims of Modern Slavery Call for Evidence via the Smart Survey platform or via email. A copy of this PIN will be available on the Call for Evidence webpage on GOV.UK.

When the Call for Evidence ends, we will publish a summary of the key points raised on the Government's gov.uk website. This will include a list of the organisations that responded, but not any individual's personal name, address, or other contact details. An external contractor will have access to redacted data from the Call for Evidence to support analysis of the data. Within 3 months after the publication of the report, all data shared with the external contractor will be securely destroyed.

Once you have submitted your response to the Call for Evidence, you will not be able to withdraw your answers from the analysis stage. However, under the Data Protection Act 2018 (and the UK General Data Protection Regulation)⁹, you have certain rights to access your personal data and have it corrected or erased (in certain circumstances), and you can withdraw your consent to us processing your personal data at any time. You have the right to lodge a complaint to the Information Commissioner's Office about our practices, to do so please visit the [Information Commissioner's Office](#) website.

Confidentiality

Information provided in response to this Call for Evidence, including personal information, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA), the General Data Protection Regulation (GDPR) and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Home Office.

The Home Office will process your personal data in accordance with the DPA and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

¹⁰ Home Office (2025) *Temporary permission to stay: considerations for victims of human trafficking or slavery*, published 9 June 2025. Available at: <https://www.gov.uk/government/publications/temporary-permission-to-stay-for-victims-of-human-trafficking-and-slavery-caseworker-guidance>

Help and Support

This Call for Evidence covers issues around modern slavery victims and exploitation. If you think you, or someone you know, might be a victim of modern slavery, help and support are available.

You can report modern slavery as a member of the public, or report it yourself if you are a potential victim. Call 999 in an emergency. If it is not an emergency you can call the UK Modern Slavery & Exploitation Helpline (run by the charity Unseen) on 0800 0121 700 or [report it online](#).

If you are a first responder you can report modern slavery here: [Report modern slavery – GOV.UK](#)

The evidence gathered through this exercise will only be used to inform the policymaking process. It is not a route for the disclosure of criminal allegations or safeguarding risks, or for queries about individual cases. **Any disclosure of criminal allegations or safeguarding risks, or queries about individual cases, will not be actioned.**

Additional guidance for those who have experienced modern slavery

Hearing from survivors and those with lived experience of modern slavery is important to ensure that our policies respond to the needs of people affected by modern slavery. If you are a survivor or have experienced modern slavery and related issues, we would particularly welcome your perspectives in this Call for Evidence.

We are inviting people to share evidence and views on the UK's system for identifying victims of modern slavery. None of the questions require respondents to disclose any details of their trafficking or exploitation experiences.

The evidence gathered through this exercise will only be used to inform the policymaking process. It is not a route for the disclosure of criminal allegations or safeguarding risks, or for queries about individual cases. **Any disclosure of criminal allegations or safeguarding risks, or queries about individual cases, will not be actioned.**

Almost all of the questions are optional, and you can choose not to respond to any of them, or to end the survey at any time.

The Call for Evidence is anonymous and no-one else will know you participated other than the person supporting you to complete it, if you are being supported to complete it.

Please do not include any information that may identify you or another person. This includes information that may directly identify people, such as your name and address or those of others. It also includes information that may allow people to be indirectly identified, such as descriptions of where they live or spend their time, what they do for work, their educational and health histories. This is not an exhaustive list; please review your contribution and use your judgement to determine whether it contains identifying information.

If you need to report a crime and it is an emergency, please call 999 and ask for the police. In a non-emergency situation, you should contact your local police station by phone, calling 101, or going to the nearest police station with a front desk.

You can call the UK Modern Slavery & Exploitation Helpline (run by charity Unseen) on 0800 0121 700 or [report it online](#).

Glossary

The identification system involves lots of technical terms and so we have prepared a glossary to explain some of the terms used within this Call for Evidence. You may wish to have the glossary open in another window so you can refer to it as you complete the Call for Evidence. A copy of this glossary will be available on the Call for Evidence webpage on GOV.UK.

| Term | Definition |
|--|--|
| Conclusive Grounds | Conclusive Grounds decisions are made to determine whether 'on the balance of probabilities' there are sufficient grounds to decide that the individual is a victim of modern slavery. |
| Competent Authority | One of the competent authorities making decisions regarding modern slavery cases referred to the National Referral Mechanism; in the UK this is the Single Competent Authority (SCA) and the Immigration Enforcement Competent Authority (IECA). |
| Criminal Injuries Compensation Scheme (CICS) | A government scheme that may provide financial compensation to people who have been physically or mentally harmed as a result of a violent crime, including modern slavery. |
| Decision-making | Decision-making in this Call for Evidence refers to a process followed by caseworkers in the Single Competent Authority (SCA) and Immigration Enforcement Competent Authority (IECA) and by multi-agency panels in the local authority areas involved in the devolved decision-making pilot on whether or not an individual is a potential victim/victim of modern slavery for the purpose of the National Referral Mechanism (NRM) – wherever in the UK a potential victim is identified. They decide whether the individual receives a positive or negative Reasonable Grounds (RG) or Conclusive Grounds (CG) in line with the Modern Slavery Statutory Guidance. |

| Term | Definition |
|--|--|
| Duty to Notify | As specified in section 52 of the Modern Slavery Act 2015, specified public authorities in England and Wales have a statutory duty to notify the Home Office when they come across potential victims of modern slavery. This duty is discharged by either referring a child or consenting adult potential victim into the NRM, or by notifying the Home Office via the Duty to Notify process if an adult victim does not consent to enter the NRM. |
| Temporary Permission to Stay for Victims of Human Trafficking or Slavery | A type of immigration status that may be granted depending on individual circumstances. It allows someone to stay in the UK for a limited time, set out in the Immigration Rules Appendix: Temporary Permission to Stay for Victims of Human Trafficking or Slavery. As set out in section 65 of the Nationality and Borders Act 2022, this leave can be granted for specific reasons subject to certain conditions, if leave is considered necessary for the purpose of; assisting the person in their recovery from any physical or psychological harm arising from the relevant exploitation; enabling the person to seek compensation in respect of the relevant exploitation; or enabling the person to co-operate with a public authority in connection with an investigation or criminal proceedings in respect of the relevant exploitation. |
| Entitlements | The rights, services, and forms of support that a person is eligible to receive after receiving a Reasonable Grounds (RG) and/or Conclusive Grounds (CG) decision through the National Referral Mechanism (NRM). These entitlements are grounded in legal and policy frameworks and are intended to support recovery from any physical, psychological or social harm arising from the conduct which resulted in the positive reasonable grounds decision in question. |
| European Convention on Action against Trafficking in Human Beings (ECAT) | An international convention to which the UK is a signatory. It provides minimum standards of how victims of trafficking should be protected and supported, including the right to a recovery period and support after a positive decision. The UK's domestic law complies with ECAT. |

| Term | Definition |
|------------------------------|---|
| Exploitation | <p>To be recognised as a victim of slavery for the purposes of support, under current legislation and guidance, someone must meet the definitions set out in the Slavery and Human Trafficking (Definition of Victim) Regulations 2022. This includes being subjected to slavery, servitude or forced or compulsory labour, and/or someone who's travel is arranged using the defined methods, with a view to the individual being exploited. Exploitation includes:</p> <ul style="list-style-type: none"> • Slavery, servitude or forced or compulsory labour • Prostitution by another person or sexual exploitation • Subject to force, threats or deception designed to induce that person to provide a service or benefit of any kind to another person • Forced labour or services • Forced criminality • Removal of organs (also known as organ harvesting) |
| First Responder Organisation | <p>An authority that is authorised to refer a potential victim of modern slavery into the National Referral Mechanism. A full list of First Responders is available here. There are different cohorts of First Responders in Scotland and Northern Ireland.</p> |
| First Responder | <p>A member at a First Responder Organisation who has a responsibility for discharging one or more of the functions of the First Responder Organisation and who has been trained to discharge those functions.</p> |
| Modern Slavery Indicators | <p>Signs of modern slavery. These might include behaviours, beliefs and experiences that a potential victim is displaying or explaining to a First Responder which cause them to make a referral on the individual's behalf into the National Referral Mechanism. Competent authority staff, while not First Responders, should be aware of the indicators to identify these indicators in referrals.</p> |

| Term | Definition |
|--|--|
| Modern Slavery <i>or</i> Modern Slavery and Human Trafficking (MSHT) | Modern Slavery refers to both human trafficking and slavery, servitude, and forced or compulsory labour. In human trafficking cases, exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and removal of organs. |
| National Referral Mechanism (NRM) | The UK's system for identifying and supporting victims of modern slavery and human trafficking. People are referred into the NRM by First Responders (like police or support workers), and individual cases are assessed in two stages: Reasonable Grounds and Conclusive Grounds. |
| Person with lived experience / survivor / victim | A person who has experienced modern slavery first hand. Evidence suggests that different groups have different preferred terms for describing those who have been exploited in modern slavery. This Call for Evidence uses the term 'victim' in many places given this is the term used in relevant legislation such as the Modern Slavery Act 2015. |
| Potential victim | An individual who is suspected of being a victim of modern slavery. They may have received a positive Reasonable Grounds decision but will not yet have received a Conclusive Grounds decision from the competent authorities. |
| Reasonable Grounds | Reasonable grounds decisions are made where there are reasonable grounds to believe, based on all available general and specific evidence but falling short of conclusive proof, that a person is a victim of modern slavery. |

| Term | Definition |
|--|---|
| Statutory Guidance | <p>The 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 is available here. This is guidance provided to public authorities and others about:</p> <p>(a) the sorts of things which indicate that a person may be a victim of modern slavery;</p> <p>(b) arrangements for providing assistance and support to people where there are reasonable grounds to believe they are victims of modern slavery;</p> <p>(c) arrangements for determining whether there are reasonable grounds to believe that a person is a victim of modern slavery.</p> |
| The Slavery and Human Trafficking (Definition of Victim) Regulations 2022 (“the 2022 Victim Definition Regulations”) | <p>This refers to Regulations that define the terms “victim of slavery” and “victim of human trafficking” for the purposes of Part 5 of the Nationality and Borders Act 2022. They are published at: The Slavery and Human Trafficking (Definition of Victim) Regulations 2022</p> |
| Voluntary Returns Scheme | <p>A government programme that helps people who want to return to their home country. It may offer help with travel and resettlement and is sometimes used by people who have been through the NRM.</p> |

Questionnaire

Initial Questions

We would welcome responses to the following questions set out in this Call for Evidence paper. You can respond to these questions via <https://www.gov.uk/government/calls-for-evidence/identification-of-victims-of-modern-slavery>.

If you have difficulties in accessing the online link, or want to send supporting evidence in response to a specific question, you can email your response to modernslavery.cfe@homeoffice.gov.uk or write to:

Identification of Victims of Modern Slavery Call for Evidence
Modern Slavery Unit
Home Office,
2 Marsham Street,
London SW1P 4DF

You can also use the email address or postal address for any queries on the Call for Evidence.

This Call for Evidence can also be accessed on GOV.UK as an Easy Read version, in British Sign Language and in Welsh.

Q1. Mandatory: Please tell us in what capacity you are primarily responding

- a) ☐ As a victim, survivor or person with lived experience of modern slavery
- b) ☐ As an academic, or on behalf of an academic organisation
- c) ☐ As a legal practitioner
- d) ☐ As a representative of a UK based NGO or civil society organisation
- e) ☐ As a representative of an international organisation
- f) ☐ As a representative of a law enforcement organisation
- g) ☐ As a representative of a local authority or health and social care trust
- h) ☐ As a Parliamentarian or elected representative (such as metro mayor, councillor) or on their behalf
- i) ☐ As an individual
- j) ☐ Other (please specify)

Q2. IF ticked b-h, or j: What is your organisation? [Maximum 50 words]

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Q3. Before responding to this Call for Evidence, were you aware of the UK's National Referral Mechanism for victims of modern slavery?

- ☐ Yes
- ☐ No
- ☐ Unsure
- ☐ Do not want to answer

Q4. What is your geographic location? If you are responding on behalf of an organisation please use the location of its headquarters. Please do not give your address here.

- ☐ England
- ☐ Northern Ireland
- ☐ Scotland
- ☐ Wales
- ☐ Overseas

Please state which country [Maximum 30 words]

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Victim Definitions

A clear and well understood definition of a victim of modern slavery is critical to ensuring accurate and timely identification. The Slavery and Human Trafficking (Definition of Victim) Regulations 2022, made under the Nationality and Borders Act 2022, set out the definitions of “victim of slavery” and “victim of human trafficking” for the purposes of accessing protection and support, and apply UK-wide. The Modern Slavery Statutory Guidance provides further detail on definitions to aid both First Responders and decision makers in the Home Office Competent Authorities.

There is no international agreed legal definition of the term ‘modern slavery’. The Slavery and Human Trafficking (Definition of Victim) Regulations 2022 are informed by, and in compliance with, the UK’s international obligations in the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons (Palermo Protocol) and the Council of Europe Convention on Action against Trafficking in Human Beings (‘ECAT’) and definitions of slavery, servitude and forced and compulsory labour used in the European Convention on Human Rights (‘ECHR’).

The definitions of the criminal offences constituting modern slavery are set out in the Modern Slavery Act 2015. The victim identification process is separate from criminal investigation into modern slavery and therefore **the criminal offences of modern slavery are not in scope of this Call for Evidence.**

Modern Slavery as an umbrella term

‘Modern slavery’ is an umbrella term used by the UK Government to encompass human trafficking, slavery, servitude and forced or compulsory labour.

[ROUTING – If the respondent has ticked Scotland/Northern Ireland to Q4 show]:

While the Slavery and Human Trafficking (Definition of Victim) Regulations 2022 apply across the UK, we recognise that use of the term ‘modern slavery’ differs across all UK nations depending on policy or legislative context. Devolved administrations may frame some issues through the lens of trafficking and exploitation rather than the broader umbrella of ‘modern slavery’. Scotland has separate legislation under the Human Trafficking and Exploitation (Scotland) Act 2015, as does Northern Ireland under the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.

For ALL respondents:

Q5a. To what extent do you agree with the following statement?

The term ‘modern slavery’ is helpful for enabling individuals and organisations, such as first responders, police and support providers, to understand who may be a victim.

- ☐ Strongly Agree
- ☐ Somewhat Agree
- ☐ Neither Agree nor Disagree
- ☐ Somewhat Disagree
- ☐ Strongly Disagree
- ☐ Don't Know
- ☐ Do not want to answer

Q5b. Why have you chosen this answer? [Maximum 300 words]

Q5c. Are there other terms that you use to describe modern slavery? What are these and why do you use them? [Maximum 300 words]

Indicators of Modern Slavery

The Modern Slavery Statutory Guidance includes common indicators that may be present in a situation of modern slavery (further information can be found at paragraph 3.2 and Annex A of the Modern Slavery Statutory Guidance). These are used by First Responders and decision-makers in the Home Office competent authorities to identify whether someone is a victim.

Q6a. To what extent do you agree with the following statement?

The current indicators in the Modern Slavery Statutory Guidance are useful for enabling individuals and organisations, such as First Responders, police and support providers, to identify who may be a victim of modern slavery.

- ☐ Strongly Agree
- ☐ Somewhat Agree
- ☐ Neither Agree nor Disagree
- ☐ Somewhat Disagree
- ☐ Strongly Disagree
- ☐ Don't Know
- ☐ Do not want to answer

Q6b. Do you think there are any indicators missing from the Modern Slavery Statutory Guidance that would help individuals or organisations to identify who may be a victim of modern slavery?

- ☐ Yes
- ☐ No
- ☐ Unsure
- ☐ Do not want to answer

[ROUTING – if 'yes' or 'unsure' to previous question]

Q6c. Which indicators do you think are missing? We are interested in hearing about indicators relevant to all types of modern slavery and indicators for different groups of victims, such as adults and children. [Maximum 300 words]

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Modern Slavery and Human Trafficking Exploitation Types

Modern slavery takes many different forms, and the NRM involves an individualised case-by-case assessment by trained decision-makers to determine whether individuals meet the definition of modern slavery. We understand that there can be uncertainty and inconsistency in how different forms of exploitation are recognised as a form of modern slavery by frontline practitioners.

We are interested in evidence about what kinds of things may assist frontline practitioners in the UK in understanding when different forms of exploitation are modern slavery, for both adults and children.

Q7a. Please indicate if you want to provide evidence on any of the following types of exploitation (tick as many as apply)

- ☐ Sexual Exploitation
- ☐ Criminal Exploitation
- ☐ Labour Exploitation
- ☐ Other type(s) of exploitation (such as organ trafficking or domestic servitude)
- ☐ None

[ROUTING – if ticked ‘Sexual Exploitation’]

Q7b. What would help practitioners understand when sexual exploitation is a form of modern slavery? This may include guidance, training, toolkits. Your answer may reflect on sexual exploitation that affects adults or children, or both. [Maximum 500 words]

[ROUTING – if ticked ‘Criminal Exploitation’]

Q7c. What would help practitioners understand when criminal exploitation is a form of modern slavery? This may include guidance, training, toolkits. Your answer may

reflect on criminal exploitation that affects adults or children, or both. [Maximum 500 words]

[ROUTING – if ticked ‘Labour Exploitation’]

Q7d. What would help practitioners understand when labour exploitation is a form of modern slavery? This may include guidance, training, toolkits. Your answer may reflect on labour exploitation that affects adults or children, or both. [Maximum 500 words]

[ROUTING – if ticked ‘Other type(s) of exploitation (such as organ trafficking or domestic servitude)’]

Q7e. What would help practitioners understand when other types of exploitation (such as organ trafficking or domestic servitude) are forms of modern slavery? This may include guidance, training, toolkits. Your answer may reflect on other types of exploitation that affect adults or children, or both. [Maximum 500 words]

Legal definitions of modern slavery

Please be aware that this section includes technical questions related to the legal definition of victims of modern slavery and therefore requires some familiarity with legal terms and the [Slavery and Human Trafficking \(Definition of Victim\) Regulations 2022](#) so these questions may not be relevant for all respondents. Please feel free to skip over these questions if you do not feel they apply to you.

The UK's international obligations include the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons (Palermo Protocol) and the Council of Europe Convention on Action against Trafficking in Human Beings ('ECAT') and definitions of slavery, servitude and forced and compulsory labour used in the European Convention on Human Rights ('ECHR').

Q8a. Based on the UK's international obligations, do you think there are any forms of adult exploitation and/or child exploitation which are not captured by the Slavery and Human Trafficking (Definition of Victim) Regulations 2022? This may include current, or new and emerging forms of exploitation

- ☐ Yes
- ☐ No
- ☐ Unsure
- ☐ Do not want to answer

[ROUTING - IF YES]

Q8b. Please provide examples of this and explain why. [Maximum 500 words]

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Initial Identification

Early identification of victims is a critical first step in the UK's modern slavery response. At present, a defined list of statutory and non-statutory organisations are designated as First Responder Organisations (FROs) authorised to refer individuals into the National Referral Mechanism (NRM). Individuals who carry out this role within these organisations are known as First Responders (FRs).

While current FROs operate across a broad range of settings, they do not cover all the contexts in which victims may be encountered. Many victims may engage with a broader range of professionals and organisations who are not currently designated as FROs. This includes faith groups, education providers, addiction services, prisons, and healthcare providers, who may be well placed to recognise indicators of exploitation and build trust with people affected by modern slavery.

We are interested in gathering evidence about the effectiveness of current identification practices, including the role of FROs and how FROs work with other organisations who are not designated as first responders, to identify victims of modern slavery.

Q9. Are you a designated First Responder to the National Referral Mechanism (NRM)? We are asking this question as some questions in this section of the Call for Evidence are specifically for First Responders.

☐ Yes

☐ No

☐ Unsure

☐ Do not want to answer

Role of First Responder Organisations and Referral Pathways into the NRM

We are interested in evidence that helps to improve our understanding of what frontline staff in organisations not currently designated as First Responder Organisations do when they encounter a person who they think shows indicators of modern slavery. The Modern Slavery Statutory Guidance includes common indicators that may be present in a situation of modern slavery (further information can be found at Chapter 3 and Annex A).

Q10a. Do you have any evidence of good practice for how organisations that are not designated as First Responder Organisations (FROs) refer individuals showing indicators of modern slavery to designated FROs? This may include, for example, safeguarding protocols, sharing referral protocols, local guidance outlining roles and responsibilities, or other collaborative arrangements. [Maximum 500 words]

[ROUTING - IF YES to 'are you a designated First Responder?']

Q10b. Do you have any evidence or examples of good practice in how your organisation fulfils its responsibilities as a First Responder? We are particularly interested in your internal processes, systems, or approaches that have proven effective in identifying and interacting with potential victims of modern slavery. [Maximum 500 words]

Awareness and Training

It is important that professionals who may encounter victims of modern slavery have appropriate awareness and training on modern slavery indicators. This enables them to identify victims early and accurately, and crucially to either support adults to make an informed decision about entering the NRM or determine when it is appropriate to complete a Duty to Notify (DtN) in England and Wales. In contrast, children must always be referred into the NRM, regardless of consent. People who may encounter victims work across varied contexts including policing, immigration enforcement, local authorities, NGOs and have different levels of experience with modern slavery.

All First Responder Organisations should ensure they have pathways and protocols in place to support First Responders and ensure that they are trained appropriately. The Home Office has not provided training materials specific to individual First Responder Organisations. However, the Home Office has produced two high level e-learning modules for use by all First Responders.

Q11a. Do you have evidence or examples of training models or materials about how to identify victims of modern slavery that you have found to be effective?

- ☐ Yes
- ☐ No
- ☐ Unsure
- ☐ Do not want to answer

[ROUTING - IF YES to 'evidence or examples of training models']

Q11b. Please describe why you think these training models or materials are effective. We are interested in hearing about things you felt were effective in terms of how the training was delivered (e.g. in-person/online), who delivered it and what topics and themes the training or materials covered. [Maximum 500 words]

Victim and survivor experience of initial identification

The initial identification of potential victims refers to situations where professionals recognise indicators of modern slavery for the first time. Initial identification is a critical step in the UK's modern slavery response, often determining whether individuals are referred into the National Referral Mechanism (NRM).

For ALL respondents:

Q12. What do you think can help victims and survivors of modern slavery feel safe and supported during the first interaction with professionals or services who may recognise indicators of exploitation? This may include, for example, the environment this interaction happens in, and the types of training that frontline professionals may need to support safe engagement. [Maximum 500 words]

Formal Identification

When First Responder Organisations (FROs) have referred individuals to the National Referral Mechanism (NRM), the Competent Authorities begin a decision-making process to determine victim status and formally identify people as victims of modern slavery.

The stage between a positive Reasonable Grounds (RG) decision and a Conclusive Grounds (CG) decision is intended to support recovery and allow for the gathering and assessment of evidence to inform a final decision on victim status. This period- often referred to as the reflection and recovery period – also provides protection from removal from the UK and initiates access to a range of support entitlements, including accommodation, financial assistance, healthcare and legal advice. However, it is important to note that this period of protection and support may not apply in cases where a Public Order or Bad Faith Disqualification is made, as set out under Section 63 of the Nationality and Borders Act 2022. These provisions are intended to exclude individuals who pose a threat to public order or are found to have made improper claims.

Responsibility for formal identification

Currently the NRM decision-making process is undertaken at central and national level by the Home Office Competent Authorities (apart from child devolution pilot sites, where decisions are made by multi-agency structures and then quality assured and communicated to potential victims by the Home Office Competent Authorities).

Historically, responsibility for NRM decision-making was held by the UK Human Trafficking Centre (now part of the National Crime Agency) and UK Border Agency (now UK Visas and Immigration). In 2019, responsibility for all NRM victim status decisions transferred to the Home Office with the creation of the Single Competent Authority (SCA). The Immigration Enforcement Competent Authority (IECA) was introduced in 2021 with responsibility for a specific cohort of adult NRM referrals (as set out in Chapter 4 of the Modern Slavery Statutory Guidance).

There are three broadly recognised models used internationally to structure the formal identification of victims of modern slavery and human trafficking: **centralised, devolved (or regional), and multi-agency**.

- In a centralised model, a single national authority, such as a government department or designated coordination body, is responsible for making formal decisions on identification.
- A devolved or regional model delegates responsibility for making formal decisions on identification to regional or local authorities.

- A multi-agency model involves a collaborative decision-making process for formal decisions on identification, typically through a panel of statutory agencies, civil society organisations, and where appropriate, survivors.

These models are not mutually exclusive, with some systems adopting hybrid approaches that combine elements of two or more models. For example, a devolved structure may incorporate multi-agency panels to enhance local decision-making with broader expertise and accountability. An example of this in practice is the devolved child decision-making pilot currently in place in 20 local areas, reflecting such a hybrid model, combining local authority-led processes with multi-agency input to support identification decisions for children.

Q13a. What do you see as the benefits and drawbacks of the current centralised model, where modern slavery victim status decisions for both adults and children are made by national Competent Authorities (e.g. SCA/IECA)? [Maximum 500 words]

Q13b. What do you see as the benefits and drawbacks of devolving modern slavery victim status decision-making for both adults and children to regional or local agencies? We are particularly interested in evidence about the capacity and readiness of local agencies to make these decisions. [Maximum 500 words]

Q13c. What do you see as the benefits and drawbacks of multi-agency involvement in modern slavery victim status decision-making for both adults and children? [Maximum 500 words]

Q13d. In a multi-agency decision-making model, which organisations or professionals do you think should be involved in the decision-making process for adult and child cases? [drop down list. Please rank the top five in order of importance (1 = most important)].

| Organisation / Professional | Adult Cases (Rank 1–5) | Child Cases (Rank 1–5) |
|---|---------------------------|---------------------------|
| Local Authorities / Health & Social Care Trusts | | |
| Police / Law Enforcement | | |
| NHS / Healthcare Providers | | |
| Mental Health Services | | |
| Support Providers | | |
| NGOs | | |
| Legal Aid Providers / Immigration Solicitors | | |
| Home Office Representatives (e.g. SCA / IECA) | | |
| Survivor or Lived Experience Representatives | | |
| Other (please specify): _____ | | |

Q13e. Do you think certain types of NRM referrals (e.g. for those exploited overseas only, those exploited in the UK only, different exploitation types) are better suited to any of the specific decision-making models? Please explain your reasoning. [Maximum 500 words]

Providing Information to Support NRM Decisions

Formal identification of victims of modern slavery is inherently complex and often requires detailed and sensitive enquiries. There is a need to ground decisions in robust evidence without delaying decisions, while ensuring that those providing information to inform decision-making have sufficient time to provide this information. These questions seek to explore how the identification process can be trauma-informed, while maintaining the integrity and evidential rigour required for fair and accurate decision-making.

Q14a. What changes could help improve the process of gathering and sharing information with the Competent Authorities to inform victim status decisions after an initial referral has been made (i.e. Reasonable Grounds and Conclusive Grounds decisions, and any reconsiderations of these decisions), while enabling these decisions to be made in a timely and efficient way? [Maximum 500 words]

Q14b. Have you or your organisation been asked to provide information to the Home Office Competent Authorities after a Reasonable Grounds decision has been made, to support an NRM decision?

☐ Yes

☐ No

☐ Unsure

☐ Do not want to answer

[ROUTING – ask IF YES]:

Q14c. What has worked well? [Maximum 250 words]

Q14d. What has made things more difficult when providing information to support a decision? [Maximum 250 words]

Experiences of the Identification Process and Conclusive Grounds Decisions

The current National Referral Mechanism (NRM) Identification process involves two key decision points:

- A **Reasonable Grounds (RG)** decision, which provides initial access to support and protection while further evidence is gathered.
- A **Conclusive Grounds (CG)** decision, which formally determines whether an individual is a victim of modern slavery or human trafficking.

The period between these decisions- often referred to as the reflection and recovery period – offers protection from removal from the UK and access to a range of support entitlements. However, this period may not apply in cases where a Public Order or Bad Faith Disqualification is made, as set out under Section 63 of the Nationality and Borders Act 2022.

The Conclusive Grounds (CG) decision marks the formal end of the National Referral Mechanism (NRM) identification process. A positive CG decision may result in the following entitlements, depending on individual circumstances:

- **Consideration of a grant of ‘Temporary Permission to Stay for Victims of Human Trafficking or Slavery’.** *An immigration decision that may grant permission to stay in the UK for a limited period, based on individual needs and*

*circumstances. If granted Temporary Permission to Stay this provides the right to work and recourse to public funds, study is permitted subject to certain conditions.*¹⁰

- **Continued access to support may end unless individuals are eligible for ongoing assistance through statutory child or adult services, depending on individual needs.**¹¹ *Support from government services, including on a needs-basis, healthcare, housing, material or and financial support and support worker.*
- **Eligibility to apply for the Criminal Injuries Compensation Scheme.**¹² *Possible financial compensation for harm caused by a violent crime in the UK.*
- **Eligibility to apply for the Voluntary Returns Scheme.**¹³ *Help to return to a home country, including travel and possible financial support, where there is no permission to stay in the UK.*
- **In addition, those who receive a negative CG decision have a right to request a reconsideration of a negative CG decision within 30 calendar days, under specific grounds.**¹⁴

For ALL respondent types

Q15. Do you think that having two decisions in the NRM (Reasonable Grounds followed by Conclusive Grounds) supports effective identification of victims of modern slavery? [Maximum 500 words]

[ROUTING - IF 'YES' to answering as 'victim / survivor/ person with lived experience' to Q1]

¹⁰ Home Office (2025) *Temporary permission to stay: considerations for victims of human trafficking or slavery*, published 9 June 2025. Available at: <https://www.gov.uk/government/publications/temporary-permission-to-stay-for-victims-of-human-trafficking-and-slavery-caseworker-guidance>

¹¹ Home Office (2025) *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*, published 2 June 2025. Available at: *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

¹² Criminal Injuries Compensation Authority and Ministry of Justice (2014) *Criminal injuries compensation: a guide*, published 26 March 2014. Available at: <https://www.gov.uk/guidance/criminal-injuries-compensation-a-guide>

¹³ *Get help to return home if you're a migrant in the UK*. GOV.UK. Available at: <https://www.gov.uk/return-home-voluntarily>

¹⁴ Home Office (2025) *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*, published 2 June 2025. Available at: *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

Q16a. THEN: OPTIONAL Have you previously been referred to the National Referral Mechanism and received a positive conclusive grounds decision?

- ☐ Yes
- ☐ No
- ☐ Unsure
- ☐ Do not want to answer

[ROUTING - If YES to 'victim / survivor / person with lived experience' AND YES to 'Have you previously been referred to the National Referral Mechanism and received a positive conclusive grounds decision?']

Q16b. Thinking about your own experience, what did receiving a positive Conclusive Grounds (CG) decision mean to you personally? For example, did it change how you felt about your situation? [Maximum 500 words]

[ROUTING - IF answered YES to 'As a representative of a UK based NGO or civil society organisation' in Q1]

Q17a. THEN 'Do you or your organisation deliver support services directly to people who have been referred into the NRM?'

- ☐ Yes
- ☐ No
- ☐ Unsure
- ☐ Do not want to answer

[ROUTING - IF YES to "Do you or your organisation deliver support services directly to people who have been referred into the NRM?" OR YES to 'Are you a designated First Responder' in Q1]

Q17b. From your perspective as a support provider or First Responder, what impact does a positive Conclusive Grounds decision have on the individuals you support?

For example, have you observed differences in how a positive Conclusive Grounds decision is experienced according to people's individual situation, for example their age, gender or immigration status? [Maximum 500 words]

Thank you for participating in this Call for Evidence.

We sincerely appreciate you taking the time to share your views and contribute to this Call for Evidence.

Please note that while all responses will be carefully reviewed and considered, we will not be able to provide individual responses.

We will not be able to process information about individual cases if it is provided through this Call for Evidence.

You can report modern slavery as a member of the public, or report it yourself if you are a potential victim. Call 999 in an emergency. If it is not an emergency you can call the UK Modern Slavery & Exploitation Helpline (run by the charity Unseen) on 0800 0121 700 or [report it online](#).

Thank you once again for your participation.



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